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Emily Farah  
*Assistant General Counsel*  
*Legal Department*

July 7, 2025

**VIA ELECTRONIC FILING**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building – 2nd Floor  
400 North Street  
Harrisburg, PA 17120

**Re: Donald Knaub v. Columbia Gas of Pennsylvania, Inc.  
Docket No. C-2025-3055803**

Dear Secretary Homsher:

Enclosed is Columbia Gas Of Pennsylvania, Inc.'s Preliminary Objections Of Columbia Gas Of Pennsylvania, Inc. To The Formal Complaint of Donald Knaub. As indicated on the attached Certificate of Service, copies have been served in the manner indicated.

If you have any questions please do not hesitate to call or email me at [efarah@nisource.com](mailto:efarah@nisource.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Emily Farah".

Emily Farah

/kak  
Enclosure  
cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Donald Knaub,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3055803
	:	
Columbia Gas of Pennsylvania, Inc.,	:	
Respondent	:	

**Notice to Plead**

**To: Donald Knaub**                      **Date: July 7, 2025**  
903 Cranberry Ln  
York, PA 17402

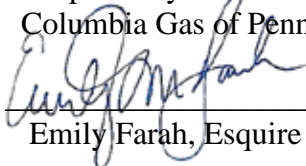
You are hereby notified, pursuant to 52 Pa. Code § 5.101, to file a written response to the enclosed Preliminary Objections within ten (10) days from service hereof or a judgment may be entered against you. The response must be e-filed or mailed to the Secretary of the Public Utility Commission:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

A copy of your response must also be **emailed** to:

Emily Farah, Esquire  
121 Champion Way, Ste 100  
Canonsburg, PA 15317  
efarah@nisource.com

Respectfully submitted,  
Columbia Gas of Pennsylvania, Inc.

  
\_\_\_\_\_  
Emily Farah, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Donald Knaub,	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3055803
	:	
Columbia Gas of Pennsylvania, Inc.,	:	
Respondent	:	

**PRELIMINARY OBJECTIONS OF COLUMBIA GAS OF PENNSYLVANIA, INC. TO  
THE FORMAL COMPLAINT  
OF DONALD KNAUB**

**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

Pursuant to 52 Pa. Code § 5.101, Columbia Gas of Pennsylvania, Inc. (“Columbia” or “the Company”) hereby submits these Preliminary Objections in response to the above-captioned Formal Complaint of Donald Knaub (“Complainant”), and in support thereof, states as follows:

**I. BACKGROUND**

1. On or about June 17, 2025, Complainant filed a Formal Complaint at the above caption. *See* Formal Complaint at ¶ 11.

2. The Formal Complaint is based on the premise that the Complainant will be able to explain his claims at a hearing. *See* Formal Complaint at ¶ 5.

**II. STANDARD OF REVIEW**

3. Pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.101(a), preliminary objections in response to a pleading may be filed the following bases:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous

or impertinent matter.

(3) Insufficient specificity of a pleading.

(4) Legal insufficiency of a pleading.

(5) Lack of a capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.

(6) Pendency of a prior proceeding or agreement for alternative dispute resolution.

(7) Standing of a party to participate in the proceeding.

5. The moving party may not rely on its own factual assertions, but must accept for the purposes of disposition of the preliminary objection, all well-pleaded, material facts of the other party, as well as every inference fairly deducible from those facts. *County of Allegheny v. Commw. of Pa.*, 490 A.2d 402 (Pa. 1985).

6. In deciding on preliminary objections, the Presiding Officer must assume, for ruling purposes only, that the factual allegations of the Complaint are true. *Id.*

### **III. PRELIMINARY OBJECTIONS**

#### **A. PRELIMINARY OBJECTION No. 1 – INSUFFICIENT SPECIFICITY OF A PLEADING**

7. The foregoing paragraphs are incorporated herein as if fully set forth.

8. Insufficient specificity of a pleading is an appropriate preliminary objection. *See* 52 Pa. Code § 5.101(a)(3).

9. A formal complaint must set forth “the act or thing done or omitted to be done” by a public utility “in violation, or claimed violation, of any law which the commission has jurisdiction to administer, or of any regulation or order of the commission.” 66 Pa.C.S. § 701.

10. A formal complaint should contain information specific enough to allow the respondent to understand the allegations against it, in order to conduct a meaningful investigation of the allegations and to prepare a coherent response or defense. 52 Pa. Code § 5.22(a)(5).

11. Here, the Formal Complaint fails to contain information with sufficient specificity to allow Columbia to prepare a coherent response or defense. *See* Formal Complaint at ¶ 4.

12. As such, the Formal Complaint does not comply with either 66 Pa.C.S. § 701 or 52 Pa. Code § 5.22(a)(5).

**B. PRELIMINARY OBJECTION No. 2 – LEGAL INSUFFICIENCY**

13. The foregoing paragraphs are incorporated as if fully set forth herein.

14. Legal insufficiency of a pleading is an appropriate preliminary objection. *See* 52 Pa. Code § 5.101(a)(4).

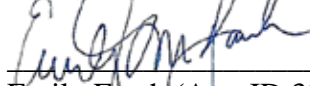
15. Even if the Commission accepts all of the facts alleged in the Complaint as true, the Complainant is not entitled to relief as a matter of law.

16. The Complaint does not set forth any facts that could be construed as a violation of a Commission regulation, statute or order.

17. As such, the Formal Complaint must be dismissed with prejudice.

WHEREFORE, Columbia Gas of Pennsylvania, Inc. respectfully requests that the Pennsylvania Public Utility Commission sustain these Preliminary Objections and dismiss the Formal Complaint of Donald Knaub with prejudice.

Respectfully submitted,  
Columbia Gas of Pennsylvania, Inc.



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Emily Farah (Atty ID 322559)  
Assistant General Counsel  
121 Champion Way, Ste. 100  
Canonsburg, PA 15317  
Tel.: (724) 416-6321  
Email: efarah@nisource.com

Date: July 7, 2025

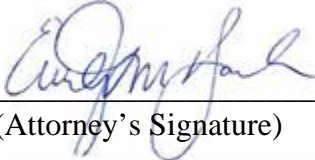
**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of § 1.54 (*relating to service by participant*).

VIA REGULAR MAIL

Donald Knaub  
903 Cranberry Lane  
York, PA 17402

Dated this 7th day of July, 2025.



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(Attorney's Signature)