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August 26, 2025

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Thomas Albert v. Peoples Natural Gas Company LLC & Major Energy Services LLC
Docket No. C-2025-3054574

Dear Secretary Homsher:

On behalf of Peoples Natural Gas Company LLC, enclosed please find a Motion to Join an Indispensable Party, to be electronically filed in the above-referenced case.

If you have any questions or concerns regarding this matter, please do not hesitate to contact me.

Very truly yours,

Enclosures

NOTICE TO DEFEND

To: Tomorrow Energy, CEO or Legal Representative:

You are hereby notified to file a written response to the **Motion to Join Tomorrow Energy** presented herewith within ten (10) days from service hereof in accordance with 52 Pa. Code § 5.103 (c). Failure to do so may result in a Judgment being rendered against you.

A handwritten signature in blue ink, appearing to be 'JL Petrisek', is centered on the page.

Jennifer L. Petrisek
Counsel for Peoples Natural Gas Company LLC

**COMMONWEALTH OF PENNSYLVANIA
BEFORE
THE PUBLIC UTILITY COMMISSION**

| | | |
|--|---|---------------------------|
| Thomas Albert |) | |
| v. |) | |
| Peoples Natural Gas Company LLC |) | Complaint Docket |
| & |) | No. C-2025-3054574 |
| Major Energy Services LLC |) | |

**MOTION OF
PEOPLES NATURAL GAS COMPANY LLC
TO JOIN TOMORROW ENERGY**

1. Complainant filed the Complaint in the above-referenced matter against Peoples on April 14, 2025.
2. The primary allegations of the complaint involve the natural gas commodity charges that were assessed to the account-of-concern from October, 2019 to February, 2025 under the Energy Choice regulations.
3. Peoples previously moved to add Major Energy Services LLC to the docket, as Major Energy appeared to have provided the commodity services.
4. Peoples later learned that Major Energy only provided commodity services to the account-of-concern from December, 2024 to February, 2025 after Major Energy purchased certain contracts from Tomorrow Energy in Fall, 2024.
5. Complainant’s concerns in the Formal Complaint primarily involve a time period in which Tomorrow Energy provided the commodity, under Energy Choice regulations, to the account-of-concern from 10/15/19 through 12/16/24.
6. The disputed balance for which Complainant seeks to have a 25% discount applied to was stated in the complaint as being for the natural gas commodity balance.
7. As Tomorrow Energy was the initial commodity provider for the account-of-concern and would be in control of the records related to such enrollment and the rate structure, Peoples requests to join Tomorrow Energy as an indispensable party to this proceeding.
8. Tomorrow Energy is a separate and distinct company from Peoples Natural Gas Company LLC (“Peoples”), to which Peoples has no affiliation.

9. Tomorrow Energy should be joined as an additional Respondent to this matter.
10. Peoples has served a copy of this Motion on Complainant and Major Energy in accordance with the attached Certificate of Service and also communicated with both parties regarding this request. Complainant and Major Energy agreed to the request to add Tomorrow Energy as an additional Respondent to this proceeding.

Wherefore, Peoples requests the issuance of an order approving this Motion to Join Tomorrow Energy.

Respectfully submitted,



Jennifer L. Petrisek
Counsel for
Peoples Natural Gas Company LLC

CERTIFICATION OF SERVICE

I hereby certify that I have served a copy of the foregoing, via electronic mail, upon the following:

Thomas Albert
1307 Creedmor Avenue
Pittsburgh, PA 15226
tomalbert@msn.com

Michael A. Gruin, Esquire
Counsel for Major Energy Services, LLC
Stevens & Lee
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PAUL KEENE, CEO
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president@tomorrowenergy.com

*Also served via US Mail.

Done at Pittsburgh, Pennsylvania, this 26th day of August, 2025



Jennifer L. Petrisek
Counsel for
Peoples Natural Gas Company LLC\