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Garrett P. Lent  
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File #: 154134

October 9, 2025

***VIA ELECTRONIC FILING***

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

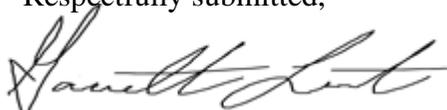
**Re: Application for Approval of Abandonment of Service by National Fuel Gas Distribution Corporation for One (1) Natural Gas Service Customer Located in Pine Creek Township, Jefferson County, Pennsylvania  
Docket No. A-2025-\_\_\_\_\_**

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Dear Secretary Homsher:

Attached, please find the Application for Approval of Abandonment of Service by National Fuel Gas Distribution Corporation for One (1) Natural Gas Service Customer Located in Pine Creek Township, Jefferson County, Pennsylvania, in the above-referenced matter. The Application and the required \$350.00 filing fee were electronically submitted to the Pennsylvania Public Utility Commission on October 8, 2025.

Respectfully submitted,



Garrett P. Lent

GPL/dmc  
Attachment

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application for Approval of Abandonment of :  
Service by National Fuel Gas Distribution : Docket No. A-2025-\_\_\_\_\_  
Corporation for One (1) Natural Gas Service :  
Customer Located in Pine Creek Township, :  
Jefferson County, Pennsylvania :

**To The Pennsylvania Public Utility Commission:**

1. The name and address of the Applicant is:

National Fuel Gas Distribution Corporation  
6363 Main St.  
Williamsville, NY 14221

2. The name and address of Applicant's attorneys are:

Anthony D. Kanagy  
Garrett P. Lent  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: 717-612-6034  
E-Mail: akanagy@postschell.com  
E-Mail: glent@postschell.com

3. (a) Applicant, National Fuel Gas Distribution Corporation (hereinafter referred to as "**National Fuel**" or the "**Company**") is a public utility corporation duly organized and existing under the laws of the State of New York. In compliance with the requirements of the Pennsylvania Business Corporation Law (Act of May 5, 1933, P.L. 364, as amended), National Fuel has secured from the Commonwealth of Pennsylvania authority to do business within the Commonwealth of Pennsylvania as a foreign corporation.

(b) National Fuel owns property in Pennsylvania for the transmission and distribution of natural gas and presently renders natural gas service to the public in various communities in the counties of Armstrong, Butler, Cameron, Clarion, Clearfield, Crawford, Elk, Erie, Forest,

Jefferson, McKean, Mercer, Venango and Warren, Pennsylvania, which territory is more fully described in Supplement No. 258 to Tariff Gas - Pa. P.U.C. No. 9, Pages 8 and 9 (the “**Tariff**”).

(c) As of March 30, 2024, National Fuel provided natural gas service to approximately 214,000 Pennsylvania customers.

4. National Fuel seeks to abandon service to the one (1) customer identified in this paragraph (“**Customer**”) at the premises specified below (the “**Premises**”). The named accountholder and address of the affected National Fuel Customer is:

<u>Named Accountholder</u>	<u>Address</u>
Reed Bros LLC <sup>1</sup>	1987 Sulgar Road Brookville, PA 15825

5. The Customer currently receives service from the Company at the rates specified in the Tariff applicable to the residential rate classification, under the Residential Service Rate Schedule.

6. While the Customer receives service from National Fuel, the Customer does not receive service from National Fuel’s low- or medium-pressure system or mains. Instead, the Customer is served off of an old gathering system (collectively, the “**Pipeline**” or the “**System**”) owned by National Fuel Gas Supply Corporation (“**Supply**”).

7. Supply has informed National Fuel that the System which provides natural gas to the Customer is near the end of its life in terms of production.

8. Company records support the information provided by Supply regarding the System being at the end of its life. In this regard, the Company has responded to several “no gas / low pressure” calls to the Premises during the past few years.

9. Additionally, the System which provides service to the Customer is at the end of its useful life and is intended to be abandoned by Supply.

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<sup>1</sup> Although the named Customer is a limited liability company, the Premises is a residential property.

10. Based upon the facts described in Paragraphs 7 through 9 above, the Company has a reasonable basis to conclude that the Customer will not be able to be provided reliable natural gas service in the future.

11. The instant Application by the Company follows from Supply informing National Fuel of its intention to retire the Pipeline. Upon receiving this information from Supply, National Fuel, *inter alia*: (a) advised Supply of the requirement to receive Commission approval prior to taking action which would jeopardize the Customer's ability to receive natural gas service (which Supply has acknowledged); (b) investigated the possibility of extending National Fuel-owned mainlines to serve the Customer (*see*, ¶ 12, *infra*); and (c) met and conferred with the Customer regarding options going forward, including providing an "energy audit" and "buyout compensation" to assist with the Customer's energy conversion (assuming Commission approval to abandon service is obtained) (*see*, ¶¶ 16-20, *infra*).

12. National Fuel investigated the possibility of connecting the Customer to National Fuel's existing distribution system. To connect the Customer to Company mainline, the Company would be required to install 10,300 feet of 2" plastic mainline at a construction cost of approximately \$976,300.00 (the "**Replacement Option**"). A map of the affected area with the Replacement Option is attached as "**Exhibit A**".

13. Given the above, a combination of factors support abandonment, including: (a) the fact that the Pipeline is unserviceable and is slated for retirement by Supply; (b) the excessive cost estimated to connect the Customer to an alternative source of gas such as the Company's existing low- and medium pressure mains; and (c) the only purpose of the current Pipeline is to provide service to the Customer. These factors necessitate the need to abandon the Pipelines.

Thus, it is not in the public interest, nor in the interest of National Fuel’s other customers construct new facilities to continue providing service to this customer.

14. National Fuel submits the following schedule of gas delivered (MCF) and revenue derived (\$) from service to the Customer for a recent twelve-month period covering July 2024 – June 2025:

Month	Reed Bros LLC 1987 Sulgar Rd Brookville, PA 15825	
	Consumption (Mcf)	Total Margin (\$)
July 2024	0.5	\$15.48
August 2024	0.1	\$14.30
September 2024	0.9	\$16.66
October 2024	8.4	\$38.87
November 2024	9.7	\$42.72
December 2024	29.8	\$102.24
January 2025	33.7	\$113.79
February 2025	8.5	\$39.17
March 2025	18.5	\$68.78
April 2025	10.8	\$45.98
May 2025	7.7	\$36.80
June 2025	3.7	\$24.96
<b>Total</b>	<b>132.3</b>	<b>\$559.75</b>

15. Due to the limited revenue to be earned, and the extensive costs involved, National Fuel estimates that the Replacement Option would result in a revenue deficiency of \$140,320.48 per year. This figure is arrived at in the following manner. First, 10,300 feet of 2” plastic pipe must be installed at a cost of approximately \$976,300.00 or \$94.79 per foot. Second, the resulting annual carrying cost will be approximately 14.43% of the construction cost. Accordingly, the carrying charges for this pipeline replacement would be approximately \$140,880.09 per year. To be economically justified, the pipeline must provide at least this amount in annual marginal revenues. As noted above, while the Customer consumed a total of 132.3 Mcf in the twelve-month

period listed above, National Fuel earned revenues in the amount of \$559.75. With an average base margin of approximately \$2.9611 per Mcf and a monthly service charge of \$14.00, the marginal revenue earned by National Fuel in the twelve months noted above, from selling gas to the Customer was approximately \$559.75. Subtracting the \$559.75 margin from the yearly revenue requirement of \$140,880.09 results in a deficiency of \$140,320.34 per year.

16. As noted above, while National Fuel reviewed the possibility of extending its existing main to serve the Customer, the Customer is not near any significant number of additional potential customers, nor is further development in the area likely to occur in the foreseeable future. Accordingly, the revenue deficiency, if National Fuel extended its existing main to serve the Customers, would likely be permanent.

17. A qualified third-party energy contractor has confirmed that alternative heating fuels are available to these Customer.

18. National Fuel offered buyout compensation to the Customer subject to this Application. At the time of submission of this filing, the Customer has agreed to the proposal and has accepted the offer.

19. To compensate the Customer for the cost of converting from natural gas, (“buyout amount”), National Fuel has agreed to pay the cost of converting the Customer’s facilities to propane, which is \$13,655.00. This amount is based on an estimate from a reputable third-party vendor that National Fuel has used for projects in the past and will only be paid upon Commission approval of the instant Application. A copy of the signed buyout agreement evidencing the foregoing is attached hereto as **Exhibit “B.”**<sup>2</sup>

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<sup>2</sup> The buyout agreement was negotiated with, and signed by, an authorized representative of Reed Bros, LLC.

20. National Fuel will notify the Customer of the application process and his right to contest this application for approval of abandonment. However, as noted in the previous paragraph, the Customer has agreed to the buyout amount of \$13,655.00 and has advised National Fuel that he has no objections to the discontinuance of gas service given same.

21. National Fuel's abandonment of service to the Customer is reasonable because of the reasons stated above including, the number of "no gas / low pressure" calls with respect to the Pipeline, the revenue deficiency National Fuel would experience each year if it extended its mainline to serve the Customer, and the reasonable compensation offered to and accepted by the Customer to convert to available alternative heating sources.

22. Approval of this Application is necessary and proper for the following reasons:

(a) The continuation of the service by National Fuel to the Customer is not in the public interest for the service reliability and economic reasons stated above;

(b) There are adequate, safe, competitively priced alternate fuel sources available to the Customer;

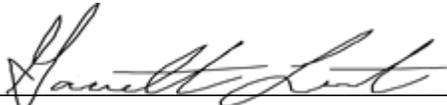
(c) National Fuel has offered to pay the Customer's cost of converting to viable alternative fuel sources in the amount of \$13,655.00 based upon the third-party energy audit; and

(d) The sole customer affected by this Application has consented to the abandonment by National Fuel in return for the buyout amount offered.

WHEREFORE, Applicant respectfully requests that the Commission issue a Certificate of Public Convenience pursuant to 66 Pa.C.S. § 1102(a)(2) authorizing National Fuel Gas Distribution Corporation to abandon gas service to the one (1) Customer listed herein.

Respectfully submitted,

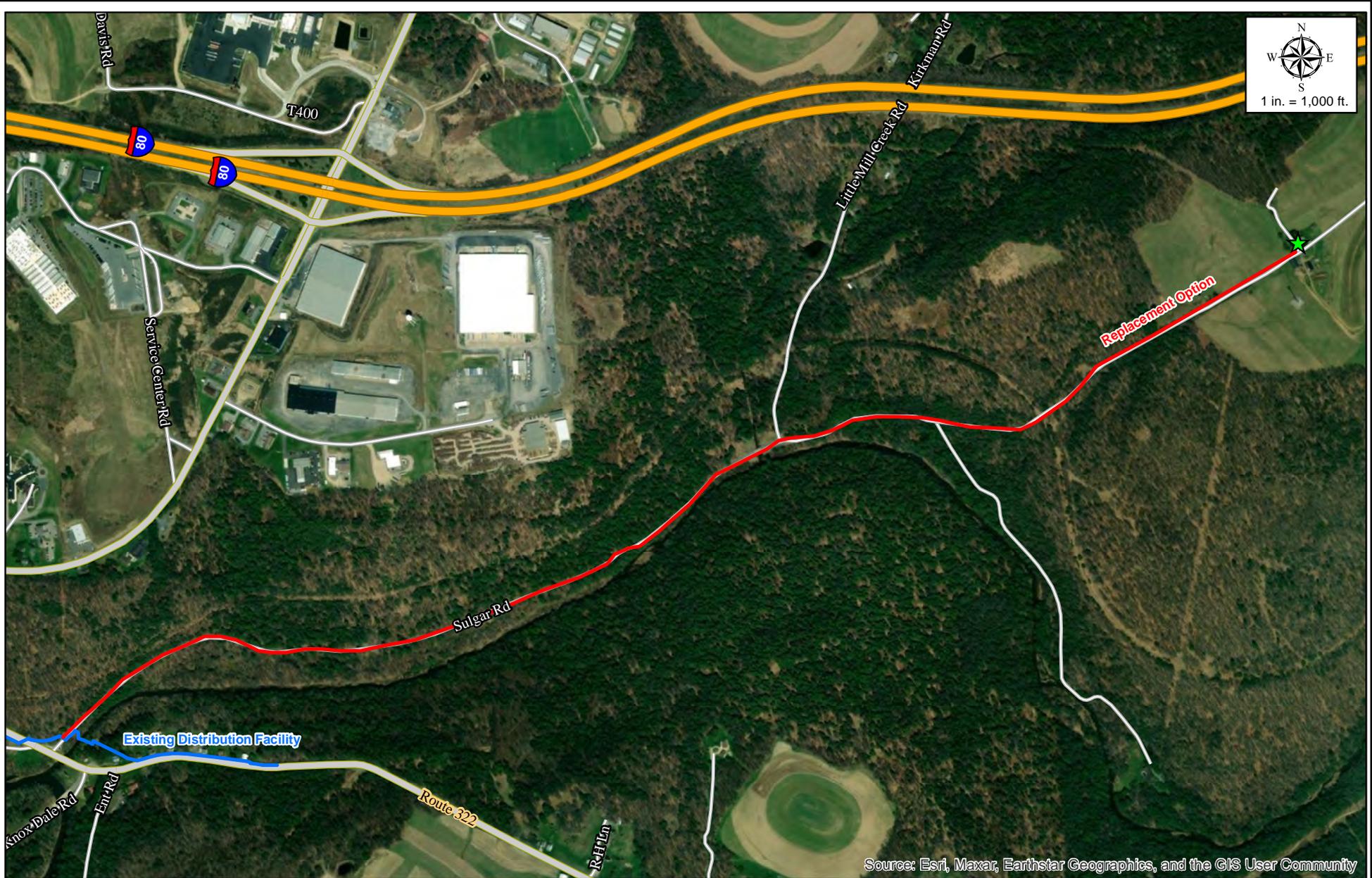
Dominick A. Sisinni (PA ID #322523)  
National Fuel Gas Distribution Corporation  
1100 State Street, P.O. Box 2081  
Eerie, PA 16512  
Phone: (814) 871-8177  
Fax: (814) 871-7708  
E-mail: sisinnid@natfuel.com

  
Anthony D. Kanagy (PA ID #85522)  
Garrett P. Lent (PA ID #321566)  
Post & Schell, P.C.  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101-1601  
Phone: (717) 731-1970  
Fax: (717) 731-1985  
E-mail: akanagy@postschell.com  
E-mail: glent@postschell.com

Date: October 9, 2025

*Counsel for National Fuel Gas Distribution Corporation*

# **EXHIBIT A**



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

**Legend**

- Replacement Option
- Existing Distribution Facility
- ★ Customer Location

**Exhibit A**  
**Replacement Option**  
**Jefferson County, PA**  
**Pine Creek Township**  
**Map Date: 7/18/2025**



**National Fuel®**

## **EXHIBIT B**

National Fuel Buyout Agreement  
For the Abandonment of Service

Reed Bros., LLC, certifies as follows:

- 1) We are the owners of property located at 1987 Sulgar Rd. Brookville, PA 16735 in Pinecreek Township, Jefferson County, Pennsylvania.
- 2) We are currently a customer of National Fuel Gas Distribution Corporation (National Fuel) at the above-mentioned address. The Billing Account Number (RBA) is 12446579.
- 3) We understand that for operating reasons National Fuel desires to terminate its natural gas service to our property.
- 4) We understand that it is our responsibility to acquire replacement utility service, should that be necessary.
- 5) We have been adequately compensated by National Fuel for the abandonment of natural gas service.
- 6) We have no objection to the discontinuance of natural gas service on or after, November 1, 2025, or pursuant to approval by the Public Utility Commission.

Witness my signature with the intent to be legally bound on this SEPT  
day of 27, 2025.

WITNESS:

OWNER: Reed Bros LLC

  
By: \_\_\_\_\_

By: \_\_\_\_\_

By: \_\_\_\_\_

Tax ID #:18-324-0119

Project Name: Sulgar Rd. Abandonment

**RELEASE**

**FOR AND IN CONSIDERATION** of the sum of thirteen thousand six hundred and fifty-five dollars and zero cents (\$13,655.00), to be paid within 60 days of the PUC approval date to Reed Bros., LLC, of 13404 State Route 322., Kittanning, PA 16201 do hereby release NATIONAL FUEL GAS DISTRIBUTION CORPORATION, a New York corporation, having an office at 1100 State Street, Erie, Pennsylvania 16501, from all liability, claims and demands which the undersigned now has or has had against NATIONAL FUEL GAS DISTRIBUTION CORPORATION relating only to damages caused by or to be caused by NATIONAL FUEL GAS DISTRIBUTION CORPORATION 's abandonment of natural gas service to a dwelling located at 1987 Sulgar Rd., Brookville, PA 15735 in Pinecreek Township, Jefferson County, PA.

It is further understood that in consideration of the payment hereinabove recited the undersigned does expressly covenant, promise and agree to hold harmless, defend and indemnify NATIONAL FUEL GAS DISTRIBUTION CORPORATION from and against all claims, suits, actions, and demands relative to all of the hereinabove mentioned damages which have been made against NATIONAL FUEL GAS DISTRIBUTION CORPORATION by or on behalf of any person, firm or corporation, as a result, directly or indirectly, of the above-described incident or any past and/or present payment, expense or damage relating thereto.

IN WITNESS WHEREOF, the undersigned, having first read this Release and having been fully advised of the conditions of the same and having fully understood the considerations, has signed this Release this SEPT day of 27, 2025, with the intent to be legally bound.

WITNESS:

\_\_\_\_\_

**Reed Bros., LLC**

By: 

By: \_\_\_\_\_

By: \_\_\_\_\_

# VOUCHER

NATIONAL FUEL GAS DISTRIBUTION CORPORATION  
 1100 State St.  
 Erie, PA 16501

TO Reed Bros. LLC  
 13404 State Route 322  
 Kittanning, PA 16201

	This voucher acknowledges payment to be made			
	in the amount of thirteen thousand six hundred and			
	Fifty-five dollars and zero cents (\$13,655.00).			
	The same being consideration for the			
	abandonment of natural gas service to the dwelling			
	known as 1987 Sulgar Rd., Brookville, PA 16735			
	in Pinecreek Township, Jefferson County			
	State of Pennsylvania.			
	The same being payment to offset the costs			
	of converting to another energy source as a			
	result of National Fuel's abandonment of a natural			
	gas pipeline known as G115.			
	Tax ID # 18-324-0119			
	Consideration:	\$13,655.00		
	Line Name: G115			
	Check No.:			
	Charge No.:	<b>TOTAL</b>		<b>\$13,655.00</b>

I certify the above account to be correct.

  
 \_\_\_\_\_

Signed this SEPT day of 27, 2025,  
 with the intent for undersigned to receive listed payment  
 within 60 days of PUC approval.

REED Bros., LLC

By:   
 \_\_\_\_\_

By: \_\_\_\_\_

By: \_\_\_\_\_

Approved:

\_\_\_\_\_

**VERIFICATION**

I, Eric W. Lynde, being a Senior Land Representative at National Fuel Gas Distribution Corporation, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect that National Fuel Gas Distribution Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date:

Signed by:



Eric W. Lynde  
**Senior Land Representative**  
**National Fuel Gas Distribution Corp.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA ELECTRONIC MAIL AND CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Reed Bros LLC  
c/o Brian Reed and Michael Reed  
1987 Sulgar Road  
Brookville, PA 15825

Allison Kaster, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street  
2nd Floor, Room-N201  
Harrisburg, Pennsylvania 17120  
E-mail: [akaster@pa.gov](mailto:akaster@pa.gov)

NazAarah Sabree, Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor Forum Place  
Harrisburg, Pennsylvania 17101  
E-mail: [ra-sba@pa.gov](mailto:ra-sba@pa.gov)

Darryl Lawrence, Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101  
E-mail: [ra-oca@paoca.org](mailto:ra-oca@paoca.org)

Date: October 9, 2025

  
\_\_\_\_\_  
Garrett P. Lent