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October 20, 2025

**VIA ELECTRONIC FILING**

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

RE: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.;  
Docket Nos. G-2025-3056022 and R-2018-2647577; **PETITION TO  
INTERVENE OF THE RETAIL ENERGY SUPPLY ASSOCIATION**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the Retail Energy Supply Association ("RESA") in the above-captioned dockets. Copies of this Petition have been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Todd S. Stewart", is written over a horizontal line.

Todd S. Stewart  
*Counsel for the Retail Energy Supply  
Association ("RESA")*

TSS/jld  
Enclosure  
cc: Per Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA ELECTRONIC MAIL**

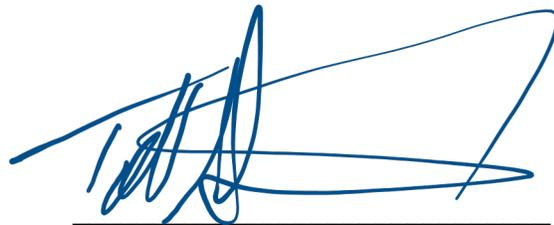
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Todd S. Stewart

DATED: October 20, 2025



Pivotal desires to provide warranty plans and other products and services to CPA customers while NDC, as a function of the services it provides to CPA, would bill for those products and services on the jurisdictional CPA bill.

2. RESA is an association of diverse competitive energy suppliers devoted to promoting vibrant and sustainable competitive retail energy markets for residential and business customers. Members of RESA include NGSs licensed by the Commission, pursuant to the Natural Gas Choice and Competition Act (“Competition Act”),<sup>3</sup> to sell natural gas supply to retail customers throughout Pennsylvania and in Columbia's service territory.

3. RESA members have participated in Commission proceedings addressing Columbia’s prior effort, through an affiliate interest agreement, to permit affiliated entities to provide similar arrangements with the charges ultimately being charged on the CPA jurisdictional bill to customers.<sup>4</sup> In that case, the Commission concluded that CPA is permitted to engage in the practice described above, of billing for products and services provided by third parties so long as Columbia provides the same ability for natural gas suppliers serving customers on the CPA system.<sup>5</sup>

4. RESA is accordingly interested in ensuring that: 1) the practice of on-bill billing (the industry term for the practice) continues to be permitted in Pennsylvania; 2) NGSs serving customers on the CPA system have similar access to on-bill billing services in accordance with the Commission’s Orders; and, 3) that no conditions are placed upon the provision of the service so as to make it unreasonable.

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<sup>3</sup> 66 Pa. C.S. §§ 2201, *et seq.*

<sup>4</sup> Pennsylvania Public Utility Commission v. CPA; Docket No. R-2018-2647577 (Final Order entered December 6, 2018).

<sup>5</sup> *Id.* at p. 50.

## II. PETITION TO INTERVENE

4. RESA is represented in the above-captioned matter by the following counsel:

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5. RESA members currently serve customers across the full spectrum of customer classes on the Columbia system, including residential, commercial, and industrial customers. RESA members also provide the same types of products and services that will be provided by Pivotal under the Affiliated Interest Agreement (“Agreement”), as filed. As such, they have a direct and immediate interest in any modifications to or approval of such an Agreement that would allow third parties to bill for such services on CPA’s jurisdictional utility bill, which could impact their ability to fairly provide customers with similar services on the Columbia system.

6. The Commission’s regulations at 52 Pa. Code § 5.72(a)(2) establish the standard for eligibility to participate in a matter before the Commission as having an “interest which may be directly affected, and which is not adequately represented by existing participants and as to which the petitioner may be bound by the action of the Commission in the proceeding.” RESA and its members have standing to participate in this matter because members serve customers on the Columbia system, which means they have an interest that will be directly affected by the outcome of this matter, their interest is not represented nor can it be adequately represented by any other party to this proceeding, and they will be bound by any action of the Commission in this proceeding. Accordingly, RESA’s Petition should be granted.

### III. CONCLUSION

WHEREFORE, RESA respectfully requests that the Presiding Administrative Law Judge and Commission, grant its Petition to Intervene in the above-captioned matter and provide RESA with full party status in this proceeding.

Respectfully submitted,



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DATED: October 20, 2025