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November 7, 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; **PREHEARING  
CONFERENCE MEMORANDUM OF THE RETAIL ENERGY SUPPLY  
ASSOCIATION**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum of the Retail Energy Supply Association ("RESA") in the above-captioned dockets. Copies of this Memorandum 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 be "T. Stewart", written over a horizontal line.

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

TSS/jld

Enclosure

cc: Administrative Law Judge Jeffrey A. Watson (via electronic mail – [jeffwatson@pa.gov](mailto:jeffwatson@pa.gov))  
Administrative Law Judge Chad L. Allensworth (via electronic mail – [callenswor@pa.gov](mailto:callenswor@pa.gov))  
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: November 7, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|   |   |                            |
|---|---|----------------------------|
| Pennsylvania Public Utility Commission, | : |                            |
|   | : | Docket Nos. G-2025-3056022 |
| v.                                      | : | R-2018-2647577             |
|   | : |                            |
| Columbia Gas of Pennsylvania, Inc.      | : |                            |

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**PREHEARING CONFERENCE MEMORANDUM  
OF THE RETAIL ENERGY SUPPLY ASSOCIATION**

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**TO THE HONORABLE JEFFREY A. WATSON  
TO THE HONORABLE CHAD L. ALLENSWORTH**

Pursuant to the Prehearing Order dated October 8, 2025, in the above-captioned matter and the Commission’s regulations at 52 Pa. Code §5.221, *et seq.*, the Retail Energy Supply Association (“RESA”), hereby submit its Prehearing Conference Memorandum.

**I. PROCEDURAL HISTORY**

1. On June 30, 2025, Columbia Gas of Pennsylvania, Inc. (Columbia or the Company) filed an Affiliated Interest Agreement (AIA) seeking approval from the Pennsylvania Public Utility Commission (Commission) of its agreement with NiSource Development Company, Inc. (NDC). The proposed AIA would allow Columbia to receive compensation for certain billing services related to NDC’s Marking and Licensing Agreement (M&L Agreement) with Pivotal home Solutions, LLC (Pivotal).

2. By Prehearing Conference Order issued October 8, 2025, interested parties were notified that a Prehearing Conference would be held on November 12, 2025, at 1:30 PM and the Parties were instructed to submit Prehearing Memoranda no later than 12:00 p.m. on November 7, 2025.

3. On October 20, 2025, RESA filed a Petition to Intervene in the above-captioned proceeding.

4. This Memorandum is submitted in compliance with Your Honors' October 8, 2025, Prehearing Conference Order.

## **II. EXPECTED ISSUES**

5. As noted in its Petition to Intervene, RESA has been involved with this issue since Columbia's 2018 rate case.<sup>1</sup> RESA's goal is, and has always been, to ensure that billing service for non-commodity products and services is provided on a non-discriminatory and comparable basis. RESA agrees with Columbia that Columbia should be permitted to provide on-bill-billing service to 3<sup>rd</sup> parties who provide these services, but RESA does not believe that Columbia's AIA filing that initiated this proceeding is sufficient to do so. In particular, there is no provision or discussion in that filing as to how Columbia will provide the service on equal terms and conditions to natural gas suppliers who request the service. Without such provisions, the foundational premise of the Commission's Order in the 2018 rate case -- that Columbia can provide on-bill-billing only if it provides the same service to other third parties -- is not satisfied. No evidence has been presented to document that Columbia has complied or is complying with that requirement, and until it does, its request is fatally deficient.

6. RESA reserves the right to raise or address additional issues as this case develops through discovery and testimony.

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<sup>1</sup> *Pa. Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.*; Docket R-2018-2647577.

### **III. PROPOSED WITNESSES**

7. RESA had not yet identified a witness for this matter, nor is it convinced that a witness will be needed to address what appears to be a legal question. If and when RESA determines that a witness is needed, it will provide notice to Your Honors and the other parties. RESA reserves the right to offer additional witnesses as necessitated by the issues.

### **IV. LITIGATION SCHEDULE**

8. RESA worked with the other parties to develop a schedule that meets all the parties' needs. Unfortunately, Columbia's desire to move this matter along, did not permit it to agree with the other parties. RESA supports the OCA schedule as modified by CAUSE-PA, but does not agree with the brevity of Columbia's approach. RESA remains committed to creating a schedule that all parties can live with. RESA also acknowledges the complication imposed by the filing on November 6, 2025, or a Motion for Judgement on the Pleadings. RESA will work cooperatively with Your Honors and the other parties to develop a schedule that is acceptable to all parties.

### **V. DISCOVERY**

9. RESA has not yet submitted any discovery as of the date of this Prehearing Memorandum but will endeavor to engage the process efficiently and complete their initial discovery as early as possible. RESA will work cooperatively with the Company and all the other parties in order to minimize discovery issues that might require the attention of the Presiding Administrative Law Judges.

### **VI. SETTLEMENT**

10. RESA is willing to engage in settlement discussions with any and all parties at any time during this proceeding and welcome the opportunity to do so at the earliest possible date.

**WHEREFORE**, RESA respectfully submits this Prehearing Conference Memorandum in anticipation of the Prehearing Conference currently scheduled to be held telephonically on Wednesday, November 12, at 1:30 pm.

Respectfully submitted,



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*Counsel for the Retail Energy Supply Association ("RESA")*

DATED: November 7, 2025