



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

December 5, 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,
Bureau of Investigation and Enforcement v.
Peoples Natural Gas Company LLC
Docket No. C-2024-3050319
Joint Petition for Interlocutory Review

Dear Secretary Homsher:

Enclosed for electronic filing is the Joint Petition for Interlocutory Review of the Bureau of Investigation and Enforcement and Peoples Natural Gas Company LLC in the above-referenced docket.

Copies have been served on the parties of record in accordance with the Certificate of Service. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Colby B. Widdowson', is written over a light blue circular stamp.

Colby B. Widdowson
Prosecutor
Bureau of Investigation & Enforcement
PA Attorney ID No. 326185
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cwiddowson@pa.gov

CBW/nb
Enclosures

cc: Administrative Law Judge Jeffrey Watson (via email - jeffwatson@pa.gov)
Allison Kaster, Director, I&E (via email - akaster@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2024-3050319
	:	
Peoples Natural Gas Company LLC	:	

**JOINT PETITION FOR INTERLOCUTORY REVIEW
OF THE BUREAU OF INVESTIGATION AND ENFORCEMENT
AND PEOPLES NATURAL GAS COMPANY LLC**

AND NOW, the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) and Peoples Natural Gas Company LLC (“Peoples”) (collectively, the “Parties”), pursuant to 52 Pa. Code § 5.301 et seq file this Petition for Interlocutory Review (“Joint Petition”) following the October 27, 2025 Interim Order Reopening the Record and Rejecting Joint Petition for Approval of Settlement (“Order”) of Presiding Administrative Law Judge Jeffrey Watson (“ALJ Watson”).

On July 26, 2024, I&E filed a Formal Complaint with the Commission alleging violations of the Public Utility Code, Commission regulations, and Code of Federal Regulations. On January 17, 2025, the Parties filed a Joint Petition For Approval Of Settlement (“Settlement”). On September 30, 2025, I&E and Peoples filed a Joint Stipulation of Facts in Support of Settlement, per ALJ Watson’s September 3, 2025 Interim Order.

On November 4, 2025 and December 3, 2025, the Parties sought a conference with ALJ Watson to express their concerns. ALJ Watson has not scheduled the requested conference.

I. QUESTION: In a Joint Settlement, is a Party required to admit to violations in order for the settlement to be approved? Suggested Answer: No.

1. The Order relies upon a supposed failure to “acknowledge a single act or failure to act by Peoples that caused or contributed in any way to the allegations and unsafe conditions alleged by

I&E” as a basis for reopening the record and rejecting the settlement. Order, p. 9. This is not a valid basis for rejecting the settlement.

2. The Commission has opined that in evaluating settlements it does not weigh evidence, does not opine on litigation positions, and recognizes that no party must admit to violations.¹

3. It is for good reason that parties are not required to admit to violations in order for a settlement to be approved. Often parties do not agree that they have committed a violation. If parties were required to admit to violations, they would, in many cases, choose not to settle.

II. QUESTION: Did the Parties provide sufficient evidence to demonstrate that the settlement is in the public interest? Suggested Answer: Yes.

1. The Order alleges that the parties failed to provide sufficient evidence to demonstrate that the settlement is in the public interest. Order, p. 10.

2. The Settlement contained “Background” facts agreed to by the Parties and was later supplemented with a Joint Stipulation of Facts at the order of ALJ Watson.

3. A settlement petition *may* contain a stipulation of fact, but it is not required.²

4. Both parties provided an analysis in their statements in support of how the settlement meets the 10 Factors for evaluating settled proceedings, as required by 52 Pa. Code § 69.1201. The Order fails to evaluate or give any consideration to these factors.

III. QUESTION: Should the ALJ have rejected the Settlement and ordered an evidentiary hearing without issuing a Recommended Decision? Suggested Answer: No.

1. The Order requires that an evidentiary hearing be held in this matter. Order, p. 11.

2. No party in this proceeding seeks or has requested an evidentiary hearing.

3. Pursuant to 52 Pa. Code § 5.232(d), “[i]f the presiding officer rules on the petition, the ruling will be made in the form of an initial or recommended decision, subject to § 5.537 (relating to rate case settlements), if approved, or in the form of an order, if disapproved.”

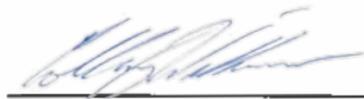
¹ *Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. Philadelphia Gas Works*, Docket No. C-2022-3033834, (Opinion and Order entered January 8, 2025) at 44, 45.

² See 52 Pa. Code § 5.232(a).

4. The ALJ has not issued an initial or recommended decision.
5. At the time of this filing, the Parties' Settlement has been pending with Office of Administrative Law Judge for approximately 11 months.
6. The Settlement provides for certain measures designed to improve public safety.
7. The ordering of evidentiary hearings serves to cause unnecessary and excessive delay.³ A March of 2026 evidentiary hearing would require a significant period of time in which the Parties would need to file briefs, reply briefs, await a decision, and then file any exceptions.
8. The Order has removed the Commission's ability to review the Settlement to determine if it is in the public interest, pursuant to 52 Pa. Code § 69.1201, and has delayed the implementation of public safety measures.
9. A Commission ruling on this Petition would serve to "prevent substantial prejudice and expedite the conduct of the proceeding."⁴

WHEREFORE, the Parties respectfully requests the Commission undertake an interlocutory review of this proceeding and issue an Order vacating the October 27, 2025 Interim Order and directing the issuance of a Recommended or Initial Decision or, in the alternative, the Commission issue an Opinion and Order approving the Settlement.

Respectfully submitted,



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Dated: December 5, 2025

³ January 17, 2025, Settlement filed. March 28, 2025, Interim Order filed but not served upon the Parties. July 8, 2025, Parties become aware of the Interim Order and promptly notified ALJ Watson of the failure to be served. ALJ Watson indicated another Interim Order would be forthcoming. September 3, 2025, Second Interim Order issued. September 30, 2025, Parties file Joint Stipulation of Facts.

⁴ 52 Pa. Code § 5.302(a).

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2024-3050319
	:	
Peoples Natural Gas Company LLC	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Joint Petition for Interlocutory Review** upon the Parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service by Electronic Mail:

Michael Turzai, Esq.
Meagan Moore, Esq.
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Date: December 5, 2025