
Garrett P. Lent
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File #: 154134

January 21, 2026

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 Two (2) Natural Gas Service Customers Located in Pine Creek Township, Jefferson County, Pennsylvania
Docket No. A-2026-**

Dear Secretary Homsher:

Attached, please find the Application for Approval of Abandonment of Service by National Fuel Gas Distribution Corporation for Two (2) Natural Gas Service Customers 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 January 15, 2026.

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-2026-_____
Corporation for Two (2) Natural Gas Service :
Customers 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, 12th 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 September 30, 2025, National Fuel provided natural gas service to approximately 214,000 Pennsylvania customers.

4. National Fuel seeks to abandon service to the two (2) customers identified in this paragraph (“**Customers**”) at the premises specified below (each, a “**Premises**”). The named account holder and address of the affected National Fuel Customers is:

<u>Named Account holder</u>	<u>Address</u>
Dale Zimmerman	1733 Route 830 Brookville, PA 15825
Kerri Raybuck	115 Waterfall Lane Brookville, PA 15825

5. While the Customers receive service from National Fuel, the Customers do not receive service from National Fuel’s low- or medium-pressure system or mains. Instead, the Customers are served off of a legacy gathering system, which includes a well line (collectively, the “**Pipeline**” or the “**System**”) owned by National Fuel Gas Supply Corporation (“**Supply**”).

6. The Customers currently receive service from the Company at the rates specified below:
- a. Customer Raybuck receives service pursuant to the Residential Service Rate Schedule specified in the Company’s Tariff.
 - b. Customer Zimmerman receives service from the Company under Rule 5A of the Company’s Tariff - “Special Utility Service,” whereby the customer receives an allotted annual volume of gas from a natural gas well (i.e., 200 mcf/year) (the “**Reserved Gas Allotment**”)¹ through a Company-owned meter, with no

¹ The Customer is billed under the Company’s Residential Service Rate Schedule if more gas is consumed at his Premises than permitted by the annual Reserved Gas Allotment.

Company distribution charges assessed to the customer for same (the “**Reserved Gas Arrangement**”).²

7. Supply has informed National Fuel that the that the System which provides natural gas to the Customers 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, since November 2024, the Company has responded to six (6) “No Gas / Low Pressure” calls to the Premises.

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

10. Given, the facts described in paragraphs 7 though 9 herein, there are concerns about reliably providing gas service in the future to this Customers.

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

12. With respect to the possibility of connecting the Customers to National Fuel’s existing distribution system, National Fuel’s investigation determined that connecting the Customers to the nearest available alternative distribution mainline is not economically feasible or a prudent

² Per Rule 5A, “Special utility service shall include (a) a request for utility service when the applicant has an installed alternative fuel capability, including service from a natural gas well. . . .”). Tariff, Page 17.

use of capital expenditure. To connect the Customers to Company-owned mainline, it would be required to install 25,714 feet of 2” plastic mainline at a construction cost of approximately \$1,486,000 (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 age and condition of the Pipeline and is slated for retirement by Supply; and (b) the excessive cost estimated to connect the Customers to an alternative source of gas such as the Company’s existing low- and medium pressure mains. 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 to upgrade and operate the existing Pipeline.

14. National Fuel submits the following schedule of gas delivered (MCF) and revenue derived (\$) from service to the Customers for a recent twelve-month period covering July 2024 – June 2025. Calendar year 2025 data has not closed out yet, but can be provided upon request in this proceeding.

Month	Dale Zimmerman 1733 Route 830 Brookville, PA 15825		Kerri Raybuck 115 Waterfall Lane Brookville, PA 15825	
	Consumption (Mcf)	Total Margin (\$)	Consumption (Mcf)	Total Margin (\$)
July 2024	2.7	\$0.00	1.3	\$17.85
August 2024	2.3	\$0.00	1.9	\$19.63
September 2024	3.6	\$0.00	1.7	\$19.03
October 2024	15.2	\$0.00	5.2	\$29.40
November 2024	19.9	\$0.00	7.0	\$34.73
December 2024	51.6	\$166.20	18.5	\$68.78
January 2025	56.2	\$0.00	18.4	\$68.48
February 2025	34.5	\$0.00	14.3	\$56.34
March 2025	34.4	\$0.00	12.4	\$50.72
April 2025	23.8	\$0.00	7.2	\$35.32
May 2025	16.6	\$0.00	6.2	\$32.36
June 2025	9.2	\$0.00	0.3	\$14.89
Total	270 Mcf	\$166.20	94.4 Mcf	\$447.53

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 \$213,816.28 per year. This figure is arrived at in the following manner. First, 25,714 feet of 2” plastic pipe must be replaced at a cost of approximately \$1,486,000 or \$57.79 per foot. Second, the resulting annual cost will be approximately 14.43% of the construction cost. Accordingly, the carrying charges for this pipeline replacement would be approximately \$214,430 per year. To be economically justified, the pipeline must provide at least this amount in annual marginal revenues. As noted above, while the Customers consumed a total of 364.4 Mcf in the twelve-month period listed above, National Fuel earned revenues in the amount of \$613.73. 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 Customers was approximately \$613.73. Subtracting the \$613.73 margin from the yearly revenue requirement of \$214,430 results in a deficiency of \$213,816.28 per year.

16. As noted above, while National Fuel reviewed the possibility of extending its existing main to serve the Customers, the Customers 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 Customers.

18. National Fuel offered buyout compensation to the Customers subject to this Application. At the time of submission of this filing, both Customers have agreed to the proposals and have accepted their respective offers.

19. To compensate the Customers for the cost of converting from natural gas, (“buyout amount”), National Fuel has agreed to pay the cost of converting the Customers’ facilities to propane, based on estimates provided from a reputable third-party vendor that National Fuel has used for projects in the past (“buyout amount”). The buyout amounts are shown in the table below and will only be paid upon Commission approval of the instant Application.

Customer	Buyout Amount
Zimmerman	\$12,200
Raybuck	\$11,500

A copy of the signed buyout agreements evidencing the foregoing is attached hereto as **Exhibit “B.”**

20. National Fuel will notify the Customers of the application process and their right to contest this Application for approval of abandonment. However, as noted in the previous paragraph, the Customers have agreed to the buyout amounts specified in the previous paragraph and have advised National Fuel that they have no objections to the discontinuance of gas service given same.

21. National Fuel’s abandonment of service to the Customers is reasonable because of the reasons stated above including, the age and condition of the Pipeline, the revenue deficiency National Fuel would experience each year if it extended its mainline to serve the Customers, and the reasonable compensation offered to the Customers 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 Customers 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 Customers;

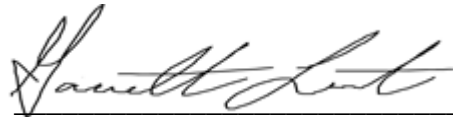
(c) National Fuel has offered to pay the Customers' cost of converting to viable alternative fuel sources in the amounts specified in paragraph 19 of this Application, based upon the third-party energy audits; and

(d) The two (2) Customers affected by this Application have consented to the abandonment by National Fuel in return for the buyout amounts offered.

WHEREFORE, the 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 two (2) Customers 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



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Fax: (717) 731-1985
E-mail: akanagy@postschell.com
E-mail: glent@postschell.com

Date: January 21, 2026

Counsel for National Fuel Gas Distribution Corporation

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

Dale Zimmerman
1733 Route 830
Brookville, PA 15825

Kerry Raybuck
115 Waterfall Lane
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

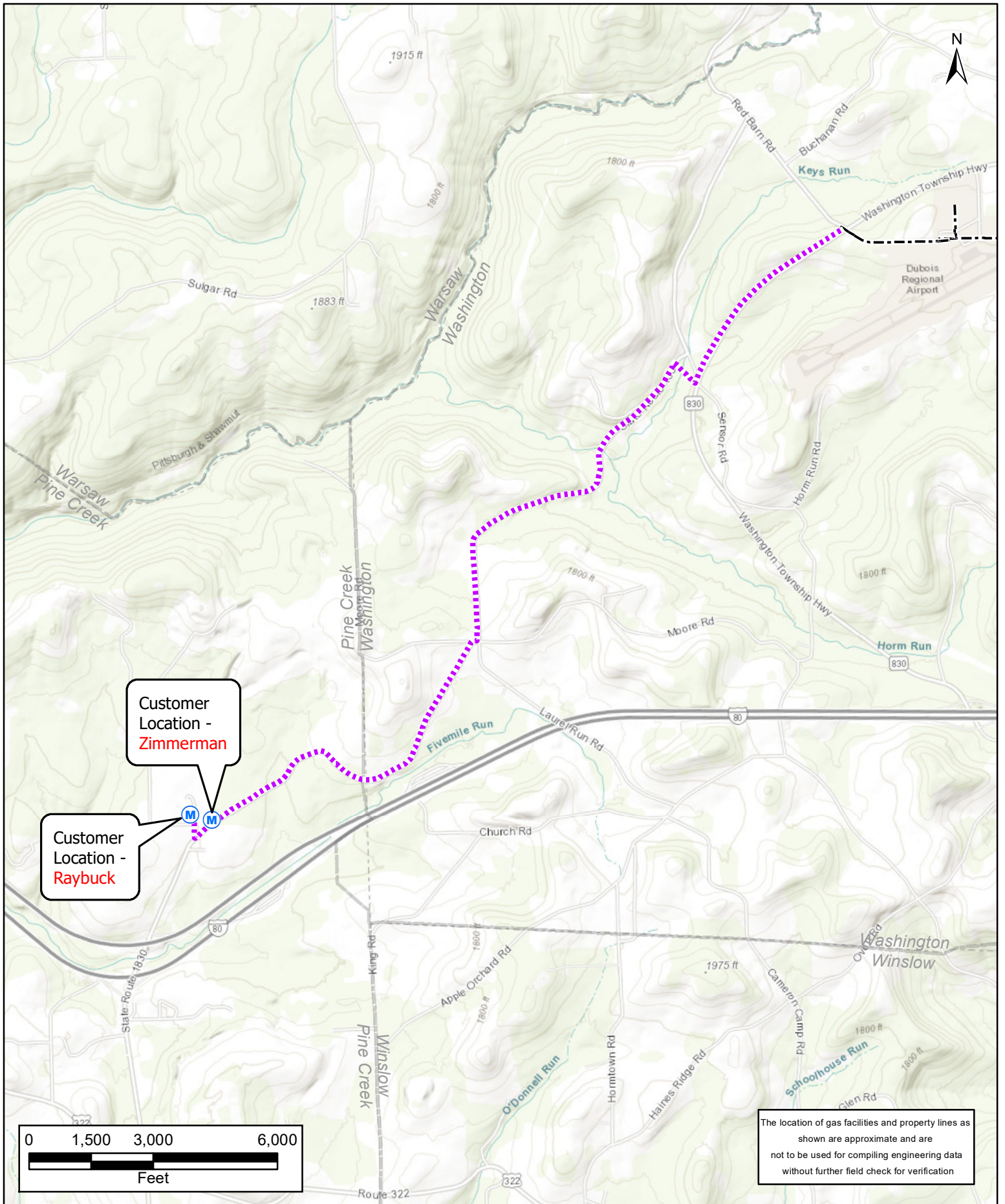
NazAarah Sabree, Small Business Advocate
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Darryl Lawrence, Esq.,
Consumer Advocate
Office of Consumer Advocate
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E-mail: ra-oca@pa.gov

Date: January 21, 2026


Garrett P. Lent

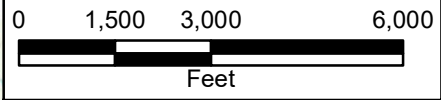
EXHIBIT A
Replacement Option



Customer Location - Zimmerman

Customer Location - Raybuck

The location of gas facilities and property lines as shown are approximate and are not to be used for compiling engineering data without further field check for verification



DRAWN BY:	M. BAUGH
APPROVED BY:	S. ABATE
JOB NUMBER:	
COUNTY:	JEFFERSON

**EXHIBIT A
REPLACEMENT OPTION**

PINE CREEK / WASHINGTON
PENNSYLVANIA




-  CUSTOMER LOCATION
-  REPLACEMENT OPTION
-  EXISTING DISTRIBUTION SYSTEM

EXHIBIT B
Buyout Agreements

National Fuel Buyout Agreement
For the Abandonment of Service

Dirk W. Raybuck and Kerri A. Raybuck., certify as follows:

- 1) We are the owners of property located at 115 Waterfall Ln., Brookville, PA 15825 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 881642303.
- 3) I 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 1st
day of December, 2025.

WITNESS: _____

OWNERS:
Dirk W. Raybuck
Dirk W. Raybuck

Kerri A. Raybuck
Kerri A. Raybuck

Tax ID #:18-346-0102-G
Project Name: G123 Abandonment

VOUCHER

NATIONAL FUEL GAS DISTRIBUTION CORPORATION (NATIONAL)

TO Dale L. Zimmerman, Jr.
1733 Route 1830
Brookville, PA 15825

	This voucher acknowledges payment to be made			
	in the amount of twelve thousand two hundred			
	Dollars (\$12,200.00).			
	The same being consideration for the abandonment			
	of natural gas service to the dwelling known as			
	1733 Route 1830, Brookville, PA			
	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's abandonment of a natural gas			
	Pipeline know as G123.			
	Tax ID # 18-346-102-A			
	Consideration:	\$12,200	00	
	Line Name: G123			
	Check No.:			
	Charge No.:	TOTAL		\$12,200.00

I certify the above account to be correct.

Signed this 11th day of December, 2025,
with the intent for undersigned to receive listed payment
within 60 days of PUC approval.

Approved: _____



By: _____

Dale L. Zimmerman, Jr.

National Fuel Buyout Agreement For the Abandonment of Service

Dale L. Zimmerman, Jr., certifies as follows:

- 1) I am the owner of property located at 1733 Route 1830, Brookville, PA 15825 in Pinecreek Township, Jefferson County, Pennsylvania.
- 2) I am currently a customer of National Fuel Gas Distribution Corporation (National Fuel) at the above-mentioned address. The Billing Account Number (RBA) is 705104105.
- 3) I understand that for operating reasons National Fuel desires to terminate its natural gas service to my property.
- 4) I understand that it is my responsibility to acquire replacement utility service, should that be necessary.
- 5) I have been adequately compensated by National Fuel for the abandonment of natural gas service.
- 6) I 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 11th day of December, 2025.

WITNESS:



OWNER:

Dale L. Zimmerman, Jr.
Dale L. Zimmerman, Jr.

Tax ID #:18-346-0102-A

Project Name: G123 Abandonment

VERIFICATION

I, Eric W. Lynde, being a Lead Land Coordinator 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: 1/21/2026

Signed by:
Eric W. Lynde
18E17232C829464
Eric W. Lynde