



COMMONWEALTH OF PENNSYLVANIA

February 9, 2026

**E-FILED**

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

**Re: Pennsylvania Public Utility Commission v. National Fuel Gas Distribution Corporation / Docket No. R-2025-3059428**

Dear Secretary Homsher:

Enclosed please find the Complaint, Public Statement, and Verification on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Steven C. Gray*

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: Kevin Higgins  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	<b>Docket Nos. R-2025-3059428</b>
<b>v.</b>	:	
	:	
<b>National Fuel Gas Distribution Corporation</b>	:	
	:	

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**COMPLAINT OF THE  
OFFICE OF SMALL BUSINESS ADVOCATE**

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1. The Complainant is:

NazAarah Sabree  
Small Business Advocate  
Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

2. The names and addresses of the Complainant's attorneys are:

Rebecca Lyttle  
Assistant Small Business Advocate  
Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

3. The respondent utility is:

National Fuel Gas Distribution Corporation  
6363 Main Street  
Williamsville, NY 14221

4. The Complainant is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. This Complaint is filed against the rates, terms, and other provisions of Supplement No. 294 to Gas Tariff – PA. P.U.C. No. 9 (“Supplement No. 294”) which was filed on January 28, 2026, by the National Fuel Gas Distribution Corporation (“NFG” or the “Company”). Supplement No. 294, if approved by the Commission, would provide the Company with a general rate increase of \$19.7 million per year. In addition, NFG is proposing to make its weather normalization adjustment (“WNA”) mechanism permanent. After preliminary review of the materials filed by the Company in support of proposed Supplement No. 294, Complainant believes, and therefore avers, that those materials may be insufficient to justify the rate increases requested and that NFG’s present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to small business customers.

6. Complainant believes, and therefore avers, that NFG’s proposed rates, rate design, and revenue allocation are or may be unjust, unreasonable, and unlawfully discriminatory in violation of, *inter alia*, Sections 1301 and 1304 of the Public Utility Code, 66 Pa.C.S. §§1301 and 1304, and contrary to appropriate public policy and sound ratemaking considerations and may not be supported by the materials filed by the Company.

7. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- A. Suspend and investigate the operation of Supplement No. 294;
- B. At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Supplement No. 294 to the extent required to make certain that NFG's rates are lawful, just, reasonable, and not unduly discriminatory; and
- C. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

*/s/ Steven C. Gray* \_\_\_\_\_  
Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

For:  
NazAarah Sabree  
Small Business Advocate

Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

Dated: February 9, 2026

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	<b>Docket Nos. R-2025-3059428</b>
<b>v.</b>	:	
	:	
<b>National Fuel Gas Distribution Corporation</b>	:	
	:	

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**PUBLIC STATEMENT OF  
THE OFFICE OF SMALL BUSINESS ADVOCATE**

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The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission (“Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a complaint against the proposed January 28, 2026, general rate increase filing of the National Fuel Gas Distribution Company (“NFG” or the “Company”).

The Small Business Advocate files this formal complaint against NFG’s proposed general rate increase to protect the interests of the Company’s small business customers. A thorough inquiry by the Commission into all elements of NFG’s proposed general rate increase is necessary to ensure that the proposed rate increase is lawful, just, reasonable, and not unduly discriminatory.

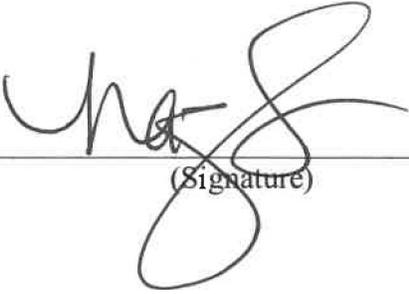
In view of the foregoing, the Small Business Advocate will participate in proceedings before the Commission to investigate the reasonableness of the proposed rate increase. The Small Business Advocate will ask the Commission to deny any proposed new rates and other tariff changes that apply to small business customers that are not proven by NFG to be lawful, just, reasonable, and not unduly discriminatory to the Company's small business customers.

Dated: February 9, 2026

**VERIFICATION**

I, NazAarah Sabree, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect 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: Februray 9, 2026

  
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(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	<b>Docket Nos. R-2025-3059428</b>
<b>v.</b>	:	
	:	
<b>National Fuel Gas Distribution Corporation</b>	:	
	:	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey, Jr.  
Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[crainey@pa.gov](mailto:crainey@pa.gov)

Scott B. Granger, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

Joel H. Cheskis, Esquire  
Harrison W. Breitman, Esquire  
Ryan Morden, Esquire  
Janna E. Williams, Esquire  
Olivia M. Spergel, Esquire  
Crystal M. Zook, Esquire  
PA Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101  
[OCANFGBRC26@paoca.org](mailto:OCANFGBRC26@paoca.org)

Anthony D. Kanagy, Esquire  
Megan E. Rulli, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101-1601  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[mrulli@postschell.com](mailto:mrulli@postschell.com)

Date: February 9, 2026

*/s/ Steven C. Gray*  
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Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538