



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

February 19, 2026

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.
National Fuel Gas Distribution Company
Docket No. R-2026-3059551
I&E Prehearing Memorandum

Dear Secretary Homsher:

Enclosed for electronic filing please find the Prehearing Memorandum of the Bureau of Investigation and Enforcement (I&E) in the above-captioned proceeding.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads 'Carrie B. Wright'.

Carrie B. Wright
Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 208185
(717) 783-6156
carwright@pa.gov

CBW/nb
Enclosures

cc: Administrative Law Judge Charece Collins (*via email* – charcollin@pa.gov)
Per Certificate of Service

I. INTRODUCTION

On December 30, 2025, National Fuel Gas Distribution Corporation (NFG or Company) pursuant to Section 1307(f) of the Public Utility Code, made its annual Gas Cost Rate (GCR) pre-filing. On January 30, 2026, NFG made a definitive purchased gas cost rate filing.

A telephonic Prehearing Conference is scheduled for February 23, 2026, with Administrative Law Judge Charece Collins presiding.

II. ISSUES

The following list represents I&E's preliminary determination of the potential issues in this case. The listing is as complete as can be made at this time. I&E specifically reserves the right to address other issues, as it deems appropriate if any such relevant issues arise. The issues are as follows:

- Renewable Natural Gas
- Certified Natural Gas
- Unaccounted for Gas
- Retainage Rate
- Spot Market Purchases – Company's reliance on Spot Market Purchases
- Capacity Requirements
- Local Production Purchases
- Peak Day Forecasts:
 - Peak Capacity to Serve Design Day;
 - Mix of Capacity;
 - Increase in Capacity; and
 - Meeting Peak Day needs.
- Hedging Practices
- Incentive Mechanisms
- Off-system Sales
- E-Factor
- Over/Under Collections

- Interest Rate Calculation for Over/Under Collections
- Supplier Refunds
- Pipeline Penalty Credits

III. WITNESSES

It is currently expected that I&E may call the following expert witnesses without being limited thereto:

Esyan Sakaya, Fixed Utility Valuation Engineer

Vanessa Okum, Fixed Utility Financial Analyst

The I&E witnesses may be contacted through the information listed above for Ms. Wright. The witness list is provided without the benefit of complete discovery or analysis of the positions of potential other parties to this proceeding. Accordingly, I&E reserves the right to call additional witnesses or withdraw the name of the witnesses listed above.

IV. EVIDENCE

I&E expects to present all written direct, rebuttal and surrebuttal testimony and accompanying exhibits at the evidentiary hearing. Moreover, I&E intends to rely on the Company's filing, answers to data requests and interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources and other public documents and reports.

V. DISCOVERY

I&E will work with the Parties and the ALJ to determine the appropriate discovery modifications in this proceeding.

VI. SCHEDULE

I&E will work with the parties to come to a mutually agreeable schedule in this proceeding.

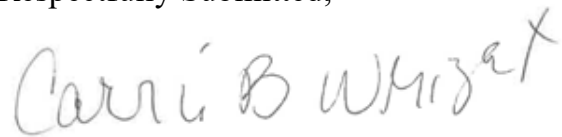
VII. SERVICE OF DOCUMENTS

For purposes of satisfying in-hand service requirements for discovery responses, prepared testimony, briefs and other documents during this proceeding, I&E requests that electronic delivery of documents continue to satisfy the service requirements without the need to follow up with hardcopies.

VIII. SETTLEMENT

I&E is willing to make good faith efforts to successfully resolve this matter through settlement. In the event settlement discussions fail to result in a full and complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding.

Respectfully Submitted,



Carrie B. Wright
Prosecutor
PA Attorney ID No. 208185

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

Dated: February 19, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
v. : Docket No. R-2026-3059551
National Fuel Gas Distribution Company :

CERTIFICATE OF SERVICE


I hereby certify that I am serving the foregoing Prehearing Memorandum dated February 19, 2026, in the manner and upon the persons listed below:

Served via Electronic Mail Only

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