



February 24, 2026

Via E-Mail Only

The Honorable Katrina L. Dunderdale
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
kdunderdal@pa.gov

Re: Pennsylvania Public Utility Commission v. National Fuel Gas Distribution Corporation
Docket Nos. R-2025-3059428; C-2026-3060437; et al.

Prehearing Memorandum of CAUSE-PA

Your Honor:

Please find the attached **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above-noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Levi A. Phillips".

Levi A. Phillips, Esq.
Counsel for CAUSE-PA

CC: Secretary Matthew L. Homsher (via E-file)
Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, et al. :
 :
 v. : R-2025-3059428;
 : C-2026-3060437;
 : et al.
 National Fuel Gas Distribution Corporation :

**PREHEARING MEMORANDUM
OF THE COALITION FOR AFFORDABLE UTILITY SERVICES
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

PENNSYLVANIA UTILITY LAW PROJECT

Counsel for CAUSE-PA

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TO THE HONORABLE ADMINISTRATIVE LAW JUDGE KATRINA L. DUNDERDALE:

On February 23, 2026, a Prehearing Conference Order (February 23rd Order) was issued by the Honorable Administrative Law Judge Katrina L. Dunderdale (ALJ). The February 23rd Order set a telephonic prehearing conference for Thursday, February 26, 2026, at 9:00 a.m., and requires parties to file a Prehearing Memorandum no later than Wednesday, February 25, 2026 at 12:00 p.m. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Memorandum.

As discussed below, CAUSE-PA requests that its Formal Complaint at Docket No. C-2026-3060437 be consolidated with the rate case docket at Docket No. R-2025-3059428.

I. Background

On January 28, 2026, National Fuel Gas Distribution Corporation (NFG) submitted a filing, Supplement No. 294 to National Fuel Gas Tariff – Pa. P.U.C. No. 9 (Supplement No. 294), seeking a rate increase of approximately \$19.7 million, or 7.4%, over existing revenues. (NFG St. 1 at 5; see also Rate Filing Cover Letter).

On February 10, 2026, CAUSE-PA filed a Formal Complaint in the above-captioned proceeding, at Docket No. R-2025-3059428, which was docketed at Docket No. C-2026-3060437. On February 23, 2026, NFG filed a Letter indicating that it would not be filing an Answer to CAUSE-PA's Formal Complaint. No objection was raised to CAUSE-PA's standing to fully participate in this proceeding as a Complainant and party.

II. Issues to be Presented

In addition to compliance with sound rate making principles, including the requirement that rates be just and reasonable, NFG must also ensure that its rates and tariff comply with universal service requirements. See 66 Pa. C.S. § 2203. In determining whether rates are just and reasonable, the Commission must examine whether rates are affordable and accessible to those served.

If the Commission approves any gas distribution rate increase, the Commission should condition approval on NFG's agreement to perform such actions which are necessary to ensure compliance with applicable sections of the Public Utility Code, Commission regulations and guidelines, and settlement agreements.

CAUSE-PA has conducted an initial review of NFG's proposed tariff changes and testimony and opposes NFG's request on the grounds that the proposed rate increase and tariff changes may result in unjust and unreasonable rates that would impose severe hardship on low and moderate income residential customers. CAUSE-PA identifies the following specific issues of concern, which must be addressed in this proceeding to determine whether NFG's proposals are just, reasonable, and in the public interest:

- i. The conformity to law and the effect of NFG's rate filing and proposed rate increases on low income households.
- ii. The need for the overall revenue requirement sought and its impact on the ability of low income households to afford gas service.
- iii. The effect of NFG's proposal to increase its fixed residential customer charge for residential customers, including the effect of this proposed increase on low income households, and on the ability to achieve appreciable bill savings through adoption of energy efficiency measures.

- iv. Whether NFG's proposal to make permanent its Weather Normalization Adjustment (WNA) pilot is just and reasonable, and how such a charge will impact NFG's low and moderate income customers.
- v. The effect of NFG's revenue requirement allocation proposal on the ability of low income customers' ability to afford to connect to and maintain NFG service.
- vi. The effects of NFG's proposed rate increase and rate proposals on low income households' access to and participation in NFG's universal service programs and the continued adequacy of those programs in ensuring that low income households can connect to and afford continued service.
- vii. The reasonableness of NFG's proposed energy efficiency pilot (EE Pilot), and whether low income customers can adequately access and proportionately benefit from the EE Pilot, if implemented.
- viii. Other issues which may arise through CAUSE-PA's review of NFG's tariff supplement, its filings, discovery responses, and the testimony of the parties during the course of the proceeding.

III. Witnesses and Testimony

CAUSE-PA intends to present the following witness to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to

Your Honor and the parties:

Harry S. Geller, Esq.
118 Locust Street
Harrisburg, PA 17101
hgeller@pautilitylawproject.org

Mr. Geller will address the issues identified above, as well as other issues that may arise throughout this proceeding.

IV. Discovery

CAUSE-PA is involved in discussions with the parties regarding mutually agreeable modifications related to discovery in this proceeding. CAUSE-PA supports the discovery modifications proposed by the Office of Consumer Advocate (OCA) in this matter.

In addition, CAUSE-PA requests that any approved discovery modifications in this matter be considered effective as of the date of the prehearing conference, as opposed to the date of a subsequent Prehearing Order.

V. Public Input Hearings

CAUSE-PA supports the scheduling of public input hearings in this matter. CAUSE-PA recommends that the Commission consider the use of telephonic and in-person public input hearings to encourage participation by the ratepayers. CAUSE-PA is coordinating with parties about suggested sites for in-person public input hearings.

VI. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement discussions early in the process.

VII. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. All documents should be served on CAUSE-PA as follows:

Levi A. Phillips, Esq., PA ID: 338477
Ria M. Pereira, Esq., PA ID: 316771
Elizabeth R. Marx, Esq., PA ID: 309014
John W. Sweet, Esq., PA ID: 320182
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CAUSE-PA requests that parties agree to electronic service in this proceeding.

VIII. Representation of CAUSE-PA at Prehearing Conference

At the Prehearing Conference, CAUSE-PA will be represented by Levi A. Phillips, Esq.

IX. Litigation Schedule

CAUSE-PA is currently involved in discussions with the parties to reach a mutually agreeable litigation schedule. In the absence of a mutually agreed upon schedule between parties, CAUSE-PA proposes the following procedural schedule:

Event	Date
Direct	Thursday, April 16, 2026
Rebuttal	Tuesday, May 12, 2026
Surrebuttal	Wednesday, May 27, 2026
Written/Oral Rejoinder	Monday, June 1, 2026
Hearings	Tuesday, June 2, 2026 through Thursday, June 4, 2026
Main Brief	Monday, June 22, 2026
Reply Brief	Wednesday, July 1, 2026
Last Public Meeting Date	Thursday, October 1, 2026
End of Suspension Date:	Thursday, October 29, 2026

CAUSE-PA's witness, Mr. Geller, will be unavailable to appear at evidentiary hearings held on or after June 3rd, 2026. CAUSE-PA respectfully requests that Mr. Geller's appearance at evidentiary hearings in this matter be limited to June 2nd, 2026. No party has expressed any objection to CAUSE-PA's request that Mr. Geller's appearance at evidentiary hearings be limited to June 2nd, 2026.

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Memorandum.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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 National Fuel Gas Distribution Corporation :

Certificate of Service

I hereby certify that I have this day served copies of the **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email

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