

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	G-2025-3056022
	:	R-2018-2647577
Columbia Gas of Pennsylvania, Inc.	:	

INTERIM ORDER CLOSING RECORD

R-2018-2647577 – July 30, 2025 Letter

On June 30, 2025, Columbia Gas of Pennsylvania, Inc. (Columbia or the Company) filed a letter with the Commission under Columbia’s 2018 Rate Case docket at R-2018-2647577 (2018 Rate Case), to serve as notice of its plan to implement the practice of on-bill billing for Columbia customers.¹ (*June 30, 2025 Base Rate Letter*).

Columbia submits that it filed its Notice Filing in the 2018 Rate Case because that proceeding addressed Columbia’s billing practices for non-commodity services offered by third parties. According to Columbia, the Notice Filing on June 30, 2025, was intended to alert the Commission and all parties to the 2018 Rate Case of the Company’s intent to permit on-bill billing for non-basic services consistent with the requirements set forth in the Commission’s December 6, 2018 Order in the 2018 Rate Case Proceeding, R-2018-2647577 (December 6, 2018 Order).²

G-2025-3056022 – June 30, 2025 AIA Letter

On June 30, 2025, Columbia also filed a letter seeking approval for an Affiliated Interest Agreement (AIA) under Section 2102 of the Public Utility Code (Code). *Pa. PUC v.*

¹ *Pa. PUC v. Columbia Gas of Pa. Inc.*, Docket No. R-2018-2647577, Letter (June 30, 2025) (*June 30, 2025 Base Rate Letter*).

² Columbia’s Response to Joint Motion for Judgment on the Pleadings, p.2.

Columbia Gas of Pa. Inc., Docket No. G-2025-3056022, (*June 30, 2025 AIA Letter*). Columbia characterizes its filing as a verified summary of an AIA between the Company and its affiliate, NiSource Development Company, Inc. (NDC), for Commission review and approval under Section 2102 of the Pennsylvania Public Utility Code (66 Pa.C.S. § 2102).³

In Columbia's *June 30, 2025 AIA Letter*, Columbia indicated that it is seeking Commission approval of an affiliate agreement with NDC, whereby the Company will provide and be compensated for certain billing services related to NDC's Marketing and Licensing Agreement (M&L Agreement) with Pivotal Home Solutions, LLC (Pivotal), a non-affiliated third party.⁴

The *June 30, 2025 AIA Letter* stated that, under an agreement between NDC and Pivotal, Pivotal will offer warranty service plans, products, and services to Columbia's customers, that NDC will grant a non-exclusive right and license for service marks to be used to market Pivotal's products,⁵ and the agreement would permit NDC to receive a revenue share percentage for the purchase of Pivotal's products by Columbia's customers.⁶ Columbia's *June 30, 2025 AIA Letter* further indicates that NiSource Corporate Services Company⁷ (NSCS), on behalf of Columbia, will provide "billing services for warranty service plans and products and services offered by Pivotal" to Columbia customers in exchange for Pivotal's payment of certain fees, including annual and monthly service fees.⁸

On August 5, 2025, the Pennsylvania Office of Consumer Advocate (OCA) filed a Protest and Public Statement at R-2018-2647577 and G-2025-3056022.

On August 25, 2025, Columbia filed an Answer to the OCA's Protest.

On August 29, 2025, the Coalition for Affordable Utility Services and Energy

³ Columbia's Response to Joint Motion for Judgement on the Pleadings, p.3.

⁴ *June 30, 2025 AIA Letter*.

⁵ *Id.*

⁶ *Id.*

⁷ NSCS is the administrative and operational support arm of NDC.

⁸ *Id.*; *Columbia's Response to MJOP ¶¶ 3-4.*

Efficiency in Pennsylvania (CAUSE-PA) filed a Protest at R-2018-2647577, and G-2025-3056022.

On September 18, 2025, Columbia filed an Answer to CAUSE-PA's Protest.

On October 8, 2025, a Prehearing Conference Notice and a Prehearing Conference Order were issued scheduling a telephonic Prehearing Conference on Wednesday, November 12, 2025, and the Office of Administrative Law Judge assigned the matter to the undersigned presiding officers.

On October 20, 2025, the Retail Energy Supply Association (RESA) filed a Petition to Intervene at R-2018-2647577 and G-2025-3056022.

On November 6, 2025, OCA and CAUSE-PA filed a Joint Motion for Judgment on the Pleadings (Joint Motion) seeking dismissal of the matter. In the Joint Motion, OCA and CAUSE-PA note that Columbia filed a letter with the Commission on June 30, 2025, under Columbia's 2018 Rate Case docket at R-2018-2647577, to serve as notice of its plan to implement the practice of on-bill billing for Columbia customers.⁹ OCA and CAUSE-PA submit that in 2018, Columbia was directed to discontinue its practice of on-bill billing or bring its practice into compliance with Sections 1502 and 2203(4) of the Public Utility Code within 60 days of the entry date of the Order.¹⁰ Subsequently, Columbia was directed by the Commission to end on-bill billing in the 2018 Rate Case docket. *Pa. PUC v. Columbia Gas of Pa. Inc.*, Docket No. R-2018-2647577, Order (August 8, 2019) (*2018 Rate Case*). OCA and CAUSE-PA further assert the following relevant activity took place in the 2018 Rate Case:

A. The Commission found that, as Columbia permitted two third-party entities to participate in "on-bill" billing but disallowed a third entity from participating, Columbia violated the prohibition on discrimination in provision of service under Sections

⁹ *Pa. PUC v. Columbia Gas of Pa. Inc.*, Docket No. R-2018-2647577, Letter (June 30, 2025) (*June 30, 2025 Base Rate Letter*).

¹⁰ *Pa. PUC v. Columbia Gas of Pa. Inc.*, Docket No. R-2018-2647577, Order at 54 (Dec. 6, 2018) (*December 6, 2018 Order*) citing 66 Pa. C.S. §§ 1502, 2203(4).

1502 and 2204 of the Public Utility Code.[¹¹]

B. On March 18, 2019, Columbia filed a report with the Commission stating that, rather than bring its “on-bill” billing practice in compliance with Section 1502 and 2203(4) of the Public Utility Code, it would end its practice of “on-bill” billing. *Pa. PUC v. Columbia Gas of Pa. Inc.*, Docket No. R-2018-2647577, Report (March 18, 2019) (*March 18, 2019 Report*).

C. In its *March 18, 2019 Report*, Columbia stated that, in accord with its plan to discontinue “on-bill” billing, Columbia would not renew the contracts for the two entities participating in the practice wherein one contract would end in September 2019, and the second contract would end in January 2023. [¹²]

D. On August 8, 2019, the Commission issued an Order rejecting Columbia’s plan to allow the two third-party contracts to run their course and required Columbia to end its “on-bill” billing practice with the two third party entities within two customer billing cycles. *Pa. PUC v. Columbia Gas of Pa. Inc.*, Docket No. R-2018-2647577, Order at 11-12 (Aug. 8, 2019) (*August 8, 2019 Order*).

E. In its *August 8, 2019 Order*, the Commission stated, “the plan presented in Columbia’s Compliance Report does not bring Columbia’s ‘on-bill’ billing practice into compliance with the Commission’s December 6 Order or Sections 1502 and 2203(4) of the Public Utility Code in a timely manner.” [¹³]

F. On November 7, 2019, Columbia filed a report with the Commission stating that the two contracts with the third-party entities had ended in compliance with the August 8, 2019, Order, and that Columbia discontinued its “on-bill” billing practice. *Pa. PUC v. Columbia Gas of Pa. Inc.*, Docket No. R-2018-2647577, Report (Nov. 7, 2019).

G. In the *June 30, 2025 Letter*, Columbia stated that it filed the letter “[i]n compliance with the

¹¹ *December 6, 2018 Order* at 50.

¹² *Pa. PUC v. Columbia Gas of Pa. Inc.*, Docket No. R-2018-2647577, Report (March 18, 2019) (*March 18, 2019 Report*).

¹³ *Pa. PUC v. Columbia Gas of Pa. Inc.*, Docket No. R-2018-2647577, Order at 11-12 (Aug. 8, 2019) (*August 8, 2019 Order*).

Commission’s December 6, 2018, Order” and that Columbia would permit all entities that wish to participate in “on-bill” billing on a non-discriminatory basis.¹⁴ OCA and CAUSE-PA assert Columbia provided scant details in its *June 30, 2025 Letter* for how this new “on-bill” billing program will operate, and it is unclear whether and to what extent entities were notified of the filing.

On November 7, 2025, Prehearing Memoranda were filed by Columbia, OCA, CAUSE-PA, and RESA in accordance with the Prehearing Conference Order.

On November 12, 2025, the Prehearing Conference was held as scheduled. Columbia, OCA, CAUSE-PA, and RESA appeared, were represented by counsel and participated.

On November 26, 2025, Columbia filed its Response to the Joint Motion filed by OCA and CAUSE-PA.

Upon review of the Joint Motion and the Response to the Joint Motion, and the receipt and review of the transcript from the prehearing conference held in this proceeding, a ruling on the Joint Motion is appropriate. Accordingly, the record will be closed by this Interim Order.

Under the circumstances, the following order will be entered.

THEREFORE,

IT IS ORDERED:

1. That the record at Docket No. G-2025-3056022 is closed.

2. That a decision on the Joint Motion for Judgment on the Pleadings filed by the Office of Consumer Advocate and CAUSE-PA will be issued in this proceeding.

Date: March 9, 2026

_____/s/
Jeffrey A. Watson
Administrative Law Judge

Date: March 9, 2026

_____/s/
Chad Allensworth
Administrative Law Judge

**G-2025-3056022 - PENNSYLVANIA PUBLIC UTILITY COMMISSION V COLUMBIA
GAS COMPANY OF PENNSYLVANIA**

Revised: November 10, 2025

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