

COMMONWEALTH OF PENNSYLVANIA



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March 10, 2026

Via Electronic Filing

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

Re: Columbia Gas of Pennsylvania, Inc.
Purchased as Cost Tariff Filing

Docket No. R-2026- 3060762

Dear Secretary Homsher:

Attached for electronic filing, please find the Office of Consumer Advocate's Formal Complaint and Public Statement in this proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Johnathan M. Longhurst
Johnathan M. Longhurst, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 338157
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Enclosures

cc: The Honorable Charles E. Rainey, Jr. (email only: crainey@pa.gov)
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Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2026-3060762
 :
 Columbia Gas of Pennsylvania, Inc. :
 :

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Public Statement and Formal Complaint, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 10th day of March, 2026

SERVICE BY E-MAIL ONLY

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Dated: March 10, 2026

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Counsel for:
Darryl A. Lawrence
Consumer Advocate

FORMAL COMPLAINT
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

1. COMPLAINANT

Darryl A. Lawrence, Consumer Advocate

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Dauphin County

Phone: (717) 783-5048

Facsimile: (717) 783-7152

2. RESPONDENT

Columbia Gas of Pennsylvania, Inc., Docket No. R-2026-3060762

3. TYPE OF UTILITY

Gas

4. COMPLAINT

- A.** On February 27, 2026, Columbia Gas of Pennsylvania, Inc. (Columbia or the Company) submitted its pre-filing information in support of its annual reconciliation of purchased gas cost (PGC) rates, pursuant to Sections 53.64 and 53.65 of the Commission's Rules and Regulations. 52 Pa. Code §§ 53.64-65. On or about April 1, 2026, Columbia will submit its definitive annual PGC filing to the Commission pursuant to Section 1307(f) of the Public Utility Code, 66 Pa. C.S. Section 1307(f).
- B.** Columbia's most recent quarterly update to its PGC rate became effective on October 1, 2025. Relative to the current rate of \$0.57777/Therm, the Company's pre-filing anticipates an increase of \$0.04738/Therm to \$0.62515/Therm. This assumes that there are no further changes to the currently effective PGC rate.
- C.** Columbia provides service to residential customers in Warren, McKean, Elk, Mercer, Venango, Clarion, Jefferson, Clearfield, Centre, Lawrence, Butler, Armstrong, Indiana, Beaver, Allegheny, Westmorland, Washington, Greene, Fayette, Sommerset, Bedford, Fulton, Franklin, Adams, York, and Chester Counties.
- D.** The Public Utility Code provides that no rates of a natural gas distribution utility shall be deemed just and reasonable unless the Commission finds that the utility is

pursuing a least cost fuel procurement policy, consistent with the utility's obligation to provide safe, adequate and reliable service. 66 Pa. C.S. § 1318. The Commission must find, among other things, that the utility has: (1) fully and vigorously represented ratepayer interests before the Federal Energy Regulatory Commission; (2) taken all prudent steps to negotiate favorable gas supply contracts and to relieve its obligations under contracts that may be adverse to ratepayer interests; (3) taken all reasonable steps to obtain lower cost gas supplies; and (4) not withheld or caused to be withheld gas supplies that should have been utilized as part of a least cost fuel procurement policy. 66 Pa. C.S. § 1318(a)(1-4).

- E.** The Consumer Advocate is empowered to represent the interests of Pennsylvania consumers before the Pennsylvania Public Utility Commission (the “Commission”) pursuant to Act 1976-161 of the General Assembly, as amended, 71 Pa. Stat. Ann. Sections 309-1, *et seq.*
- F.** After initial review of Columbia’s filing information, the Consumer Advocate files this Formal Complaint in order to ensure that the Company's proposed PGC rate is consistent with a least cost fuel procurement policy and does not result in rates or charges that are excessive, unjust or unreasonable, discriminatory or otherwise contrary to Commission Regulations or policy.

5. RELIEF

The Consumer Advocate respectfully requests that the Commission:

- A.** Hold evidentiary hearings before the Office of Administrative Law Judge, as mandated by Section 1307(f) of the Public Utility Code;
- B.** Deny any rate or tariff changes, which are not the result of a least cost fuel procurement policy as defined by the standards set forth in Section 1318 of the Public Utility Code, 66 Pa. C.S. Section 1318, and as defined by other applicable ratemaking standards;
- C.** Ensure that the Company’s PGC customers are only allocated those costs that should be borne by them;
- D.** Deny any rate or tariff that is unjust, unreasonable, unduly discriminatory or contrary to sound ratemaking principles; and;
- E.** Grant such other relief that the Commission may deem to be necessary, just or proper.

6. VERIFICATION AND SIGNATURE

I, Darryl A. Lawrence, Consumer Advocate hereby state that the facts above set forth are true and correct (or 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. Section 4904 (relating to unsworn falsification to authorities).

Darryl A. Lawrence
Signature

March 10, 2026
_____ Date

7. LEGAL REPRESENTATION

Harrison W. Breitman, Senior Assistant Consumer Advocate, PA Bar No. 320580
John Longhurst, Assistant Consumer Advocate, PA Bar No. 338157

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**PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)**

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file a Formal Complaint in the proceedings before the Commission involving the proposed purchased gas cost rate change by Columbia Gas of Pennsylvania, Inc. (Columbia or the Company) at Docket No. R-2026-3060762.

On February 27, 2026, pursuant to Sections 53.64 and 53.65 of the Commission's Rules and Regulations, 52 Pa. Code Sections 53.64-65, Columbia submitted its pre-filing information in support of its annual reconciliation of purchased gas cost (PGC) rates. On or about April 1, 2026, Columbia will submit its definitive annual PGC filing to the Commission pursuant to Section 1307(f) of the Public Utility Code. 66 Pa. C.S. § 1307(f).

The Office of Consumer Advocate has filed this Formal Complaint to ensure that the Commission examines Columbia's PGC filing and that any implemented PGC rate is consistent with the least cost fuel procurement obligation under the Public Utility Code. A thorough analysis and review are appropriate because Section 1318 of the Public Utility Code mandates that purchased gas costs cannot be determined to be just and reasonable unless such rates result from a least cost fuel procurement policy. 66 Pa. C.S. §1318(a). The OCA will seek to ensure that only those purchased gas costs which meet the requirements of Section 1318 will be paid by Columbia's ratepayers. The OCA will also seek to ensure that the rates approved by the Commission are otherwise just and reasonable, and not unduly discriminatory or excessive.