



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

April 1, 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.  
Columbia Gas of Pennsylvania, Inc. – 1307(f)  
Docket No. R-2026-3060762  
**I&E Prehearing Memorandum**

Dear Secretary Homsher:

Enclosed for electronic filing please find the Prehearing Memorandum of the Bureau of Investigation and Enforcement 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 black ink, appearing to read 'Adam Williams', is written over a white background.

Adam J. Williams  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 310019  
(717) 787-8754  
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AJW/nb  
Enclosures

cc: Administrative Law Judge Emily I. DeVoe (via email – [edevoe@pa.gov](mailto:edevoe@pa.gov))  
Per Certificate of Service



Adam J. Williams of I&E entered his appearance on March 13, 2026. A prehearing conference is scheduled for Thursday, April 2, 2026 at 1 p.m. with Administrative Law Judge Emily DeVoe presiding. I&E submits this Memorandum in compliance with the Prehearing Conference Order of March 30, 2026.

## **II. ISSUES**

The following list represents I&E's preliminary determination of the potential issues in this case:

- 1) Quarterly E-factor and PGC rates reconciliation
- 2) Pass-back of supplier's refund and penalty credit with interest at 6%
- 3) Application of proper interest rate for over/under collection of gas cost in the PGC rate calculation
- 4) Compliance of audit recommendations made in the Commission Report on Statements of Purchased Gas Costs
- 5) Unaccounted for Gas
- 6) Retainage Rate
- 7) Spot Market Purchases/Company's reliance on Spot Market Purchases
- 8) Capacity Requirements
- 9) Local Production Forecasts
- 10) Peak Day Forecasts (Peak Capacity to Service Design Day, Mix of Capacity, Increase in Capacity, Meeting Peak Day Needs)
- 11) Hedging Practices
- 12) Incentive Mechanisms
- 13) Off-System Sales
- 14) Other such issues that may arise from Columbia's direct testimony to be filed today, April 1, 2026

The list is as complete as can be made at this time. I&E reserves the right to address other issues, as it deems appropriate if any such relevant issues arise.

### **III. WITNESSES**

I&E expects to call the following expert witnesses at these dockets without being limited thereto:

- D.C. Patel, Fixed Utility Financial Analyst
- Eryan Sakaya, Fixed Utility Valuation Engineer

I&E witnesses may be contacted through the information listed above for Mr. Williams. The witness list is provided without the benefit of complete discovery or analysis of the positions of other parties to this proceeding. Accordingly, I&E reserves the right to call additional witnesses or withdraw the names 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. However, there may be issues of Commission policy or legal representation that are not properly the subject of testimony or there may be factual issues that are clear on the record and need not be supported by testimony. I&E reserves the right to dispense with testimony, when, in its opinion, an issue can be adequately addressed through briefing.

**V. DISCOVERY**

Due to the time limitations in the proceedings, I&E requests that the Commission’s Rules of Practice and Procedure for the conduct of discovery be modified as follows:

1. Answers to written interrogatories shall be served in-hand within ten (10) calendar days of service.
2. Objections to interrogatories shall be communicated orally to the opposing party within three (3) calendar days of service; unresolved objections shall be served to the other party in writing within five (5) days of service of interrogatories.
3. Motion to dismiss objections and/or direct the answering of interrogatories shall be filed within five (5) calendar days of service of written objections.
4. Answers to motions to dismiss objections and/or direct the answering of interrogatories shall be filed within three (3) calendar days of service of such motions.
5. Discovery or discovery-related pleadings served after 12:00 noon on a Friday or after 12:00 p.m. on any business day preceding a state holiday will be deemed to be served on the next business day.

**VI. SCHEDULE**

I&E is committed to cooperating with all parties and with Judge DeVoe to finalize an acceptable procedural schedule. Consistent with discussion among the parties thus far, I&E proposes the following schedule:

<b>Date</b>	<b>Event</b>
Monday, May 4, 2026	Written Direct Testimony of All Non-Company Parties
Friday, May 15, 2026	Written Rebuttal Testimony of All Parties
Friday, May 22, 2026	Written Surrebuttal Testimony of All Parties
Tuesday, May 26, 2026	Oral Rejoinder Outline
Thursday, May 28, 2026	Telephonic Evidentiary Hearing
Thursday, June 4, 2026	Main Briefs Due
Friday, June 12, 2026	Reply Briefs Due

## **VII. SERVICE OF DOCUMENTS**

For purposes of satisfying in-hand requirements for discovery responses, prepared testimony and briefs, I&E proposes to both only serve and accept electronic delivery of documents. If ALJ DeVoe and/ or any party prefers to have additional service (or “hard copies”) of documents by mail, I&E will certainly provide such service.

## **VIII. SETTLEMENT**

I&E intends to participate in any settlement discussions and is willing to work with the parties to reach a resolution of any or all issues. In the event settlement discussions fail to result in a complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding as warranted.

Respectfully Submitted,



Adam J Williams  
Prosecutor  
PA Attorney ID No. 310019

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

Dated: April 1, 2026

