



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

April 10, 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.
Peoples Natural Gas Company LLC – 1307(f)
Docket No. R-2026-3060165
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 black ink that reads 'Scott B. Granger'. The signature is written in a cursive, flowing style.

Scott B. Granger
Senior Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 63641
(717) 425-7593
sgranger@pa.gov

SBG/ac
Enclosures

cc: Administrative Law Judge Katrina L. Dunderdale (via email – kdunderdal@pa.gov)
Administrative Law Judge Ann Quimby (via email – aquimby@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2026-3060165
	:	
Peoples Natural Gas Company LLC	:	
1307(f) Purchased Gas Costs	:	

**PREHEARING MEMORANDUM
OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT**

**TO ADMINISTRATIVE LAW JUDGES KATRINA DUNDERDALE
AND ANN QUIMBY:**

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) respectfully submits the following Prehearing Memorandum in the above-captioned proceeding.

The Bureau of Investigation and Enforcement Prosecutor in these proceedings will be Scott B. Granger. Contact information is as follows:

By mail: Scott B. Granger, Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120

By e-mail: sgranger@pa.gov

By telephone: (717) 425-7593

I. INTRODUCTION

On January 30, 2026, Peoples Natural Gas Company LLC (“Peoples” or Company”) submitted information related to purchases from an affiliated interest that is required pursuant to 52 Pa. Code 53.65 to be filed 60 days prior to the filing of a tariff under 66 Pa. C.S.A. Section 1307(f), purchased gas costs (“PGC”).

On February 3, 2026, the Office of Consumer Advocate (“OCA”) filed its Formal Complaint and Public Statement.

On February 6, 2026, the Office of Small Business Advocate (“OSBA”) filed its Notice of Appearance.

On March 2, 2026, Peoples submitted the required data pursuant to 52 Pa. Code, Sections 53.64 and 53.65, to be filed before tariff filings for changes in rates for recovery of purchased gas costs.

On March 9, 2026, I&E filed its Notice of Appearance.

On April 1, 2026, Peoples filed its direct testimony, exhibits, and Pro Forma Tariff Supplement.

A telephonic Prehearing Conference is scheduled for Monday, April 13, 2026, beginning at 9:00 am before Administrative Law Judges Katrina Dunderdale and Ann Quimby presiding telephonically.

II. WITNESSES AND ISSUES

I&E currently expects that it may call the following expert witnesses, without being limited thereto, who will address the issues listed *infra*. The list represents I&E’s preliminary determination of the potential issues in these proceedings. The listing is as

complete as can be made at this time. I&E specifically reserves the right to address other issues it deems appropriate if any such relevant issues arise. The witnesses and issues are as follows:

Witnesses:

- Ethan Cline, Fixed Utility Valuation Engineer.
- Anthony Spadaccio, Fixed Utility Analyst/Engineer Supervisor.

Issues:

- Retainage Rate.
- Unaccounted for Gas.
- Capacity Release.
- Peak Day Forecasts.
- Voluntary Energy Reduction Program.
- C-Factor.
- E-Factor.
- Supplier Refunds.
- Pipeline Penalty Credits.
- Interest Rate on Over/Under Collections.
- Peak Day Demand.

The I&E witnesses may be contacted through the information listed above for Prosecutor Granger. The witness list and list of issues 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 and to address additional issues, if any such relevant issues arise.

III. 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, quarterly and 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.

IV. DISCOVERY

Discovery in these proceedings will be conducted according to 52 Pa. Code §§5.321 et. seq. No modifications to the rules of discovery have been proposed by I&E. I&E will give due consideration to any discovery modifications proposed by any other party. In the past, I&E has generally not opposed discovery modifications routinely suggested by the OCA. Also, pursuant to 52 Pa. Code §§5.322 and 5.331(b), discovery has begun and is ongoing.

V. SCHEDULE

As of this date, I&E understands that the parties have not yet agreed to a litigation schedule. I&E therefore proposes:

Pre-Filing	March 2, 2026.
Definitive Filing – Direct Testimony	April 1, 2026.
Prehearing Conference	April 13, 2026.
Other Parties Direct	April 20, 2026.
Rebuttal Testimony	May 4, 2026.
Surrebuttal Testimony	May 14, 2026.
Evidentiary Hearings ¹ and Oral Rejoinder	May 18 or 20, 2026.
Main Brief	June 2, 2026.
Reply Brief	June 12, 2026.

¹ Upon the rescinding of Governor Tom Wolf's Proclamation of Disaster Emergency, and the re-opening of the Keystone Commonwealth Building, I&E requests that Hearings be held in Harrisburg, PA.

VI. SERVICE OF DOCUMENTS

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

VII. 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,



Scott B. Granger
Senior Prosecutor
PA Attorney ID No. 63641

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120
(717) 425-7593
sgranger@pa.gov

Dated: April 10, 2026

