



COMMONWEALTH OF PENNSYLVANIA

April 17, 2026

E-FILED

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

Re: Pennsylvania Public Utility Commission v. National Fuel Gas Distribution Corporation – 1307(f) / Docket No. R-2026-3059551

Dear Secretary Homsher:

The Office of Small Business Advocate (“OSBA”) submits this letter to inform the Public Utility Commission that it does not oppose the *Joint Petition for Settlement of the Section 1307(f) Rate Investigation* filed by the parties in the above-referenced proceeding. The OSBA filed a Complaint in this proceeding on February 9, 2026.

As set forth in the OSBA’s February 19, 2026 Prehearing Memorandum, the OSBA reviewed the following issues set forth in the annual Purchased Gas Cost (“PGC”) Rate filing of National Fuel Gas Distribution Corporation (“NFG” or the “Company”):

- NFG’s lost and unaccounted-for gas rates;
- the Company’s gas price hedging strategy;
- the Company’s design day demand forecasting and peak day capacity requirements;
- the Company’s gas supply mix and strategy for basin diversification;
- the reasonableness of NFG’s MMT transportation rate;
- the Company’s DMT customer imbalances;
- NFG’s strategy for capacity release, off-system sales, asset management arrangements, and storage fill agreements;
- whether the Company’s pilot program to procure certified natural gas is functioning properly; and
- whether the Company’s pursuit of renewable natural gas (“RNG”) was reasonable.

The OSBA also engaged in settlement discussions with NFG and the other parties. The OSBA did not identify any aspects of the issues, set forth above, that were unjust or unreasonable to small business customers. Therefore, this letter serves as formal notice that the OSBA does not oppose the *Joint Petition for Settlement of the Section 1307(f) Rate Investigation* filed by the other parties.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Mark Ewen
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket Nos. R-2026-3059551
v.	:	C-2026-3060438
	:	
National Fuel Gas Distribution Corporation – 1307(f)	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charece Collins
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Date: April 17, 2026

/s/ Steven C. Gray
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