



April 30, 2026

SUBMITTED VIA EFILING

**Pennsylvania Public Utilities Commission**

Commonwealth Keystone Building – 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, PA 17120

**Re: Docket: A-2015-2496883**  
**ACT 127 Pipeline Registration Information Request**  
**Mileage changes in Annual Registration**

Dear Commissioner:

This letter is in response to Commission’s April 14, 2026 notice regarding the incomplete March 27, 2026 Act 127 pipeline registration for SW Gathering, docket A-2015-2496883.

When compared to previous registrations, Type R mileage decreased from 1.5 to 0 miles in Bradford County and by 3 miles in Susquehanna County. In addition, Type C mileage reduced by 6.5 miles in Susquehanna County. These changes are the result of a 2025 GIS integration project in addition to an independent jurisdictional analysis of all pipeline mileage conducted by SW Gathering. A summary table and detailed explanations for the changes by county are provided below.

**Table 1. Pipeline Mileage Reduction Summary, Reporting Years 2023-2025**  
PHMSA Type C and Type R reported compared to PA PUC as reported and as corrected

Year	PHMSA		PUC (Totals, as submitted)		PUC (Totals, 2023-24 as corrected)	
	Type R	Type C	Type R	Type C	Type R	Type C
2023	5.03	49.01	6.5	47.6	5	47.6
2024	5.03	49.01	6.5	47.6	5	49.1
2025	1.97	41.08	2	41.1	2	41.1
<i>Decrease by Classification</i>	3.06	7.93	4.5	6.5	3	8
<b>TOTAL mileage decrease</b>	<b>10.99</b>		<b>11</b>		<b>11</b>	

Type R mileage in Bradford County:

Previous Act 127 registrations in 2023 and 2024 incorrectly reported this as Type R. The gathering line in question is classified as Type C according to two separate, independent jurisdictional analyses. Moreover, the PHMSA submittals in 2023 and 2024 reported 5.03 miles of Type R, not 6.5 miles. This line is part of the Katie Discharge that straddles the Susquehanna-Bradford County line and during the GIS integration was listed as being entirely in Susquehanna County. We are correcting our GIS data to properly reflect that approximately 1.5 miles of the line is in Bradford County.

Type R mileage reduction in Susquehanna County:

During the jurisdictional analysis conducted in 2025, three miles of Type R pipeline in Susquehanna County were reclassified as flowlines (not regulated).

**Expand Energy Corporation**

Type C mileage reduction in Susquehanna County:

During the jurisdictional analysis conducted in 2025, a total of 7.93 miles of Type C pipeline in Susquehanna County were reclassified as flowlines (not regulated). This mileage accounts for the 1.5 miles of Type C that has been incorrectly reported as Type R in 2023 and 2024. We are correcting our GIS data to properly reflect that approximately 1.5 miles of the line is in Bradford County.

Please advise if you need additional information. My contact information is: [dana.drury@expandenergy.com](mailto:dana.drury@expandenergy.com) or (405) 673-2297.

In accordance with 52 Pa Code § 1.36, this transmittal includes a verification statement from an officer of the company.

*I, **Eric Dean**, hereby state that the facts above set forth 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. § 4904 (relating to unsworn falsification to authorities).*

Signature: *Eric Dean*  
Eric Dean (Apr 30, 2026 08:29:00 CDT)

Title: Director, Regulatory and Assurance

Date Apr 30, 2026






# Itr\_papuc swga response

Final Audit Report

2026-04-30

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