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Lindsay A. Berkstresser  
Principal

lberkstresser@postschell.com  
717-612-6022 Direct  
717-731-1985 Direct Fax  
File #: 210470

June 15, 2026

***VIA ELECTRONIC FILING***

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

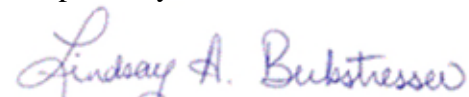
**Re: Pennsylvania Public Utility Commission, *et al.* v Peoples Natural Gas Company  
LLC  
Docket Number R-2026-3060855 *et al.***

Dear Secretary Homsher:

Attached for filing in the above-referenced proceeding are the Objections of Peoples Natural Gas Company LLC to the Statement and Exhibit of Richard C. Culbertson.

Copies are being provided as indicated on the Certificate of Service.

Respectfully Submitted,

  
Lindsay A. Berkstresser

LAB/bfc  
Attachment

cc: Administrative Law Judge Charece Z. Collins (*via email; w/attachment*)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA E-MAIL

Steve Gray, Esq.  
Senior Attorney  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
*Counsel for OSBA*

Joel H. Cheskis, Esq.  
Jacob Guthrie, Esq.  
Ryan M. Morden, Esq.  
Olivia M. Spergel, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[JCheskis@paoca.org](mailto:JCheskis@paoca.org)  
[OCAPeoplesBRC2026@paoca.org](mailto:OCAPeoplesBRC2026@paoca.org)  
*Counsel for OCA*

Michael A. Podskoch, Jr., Esq.  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, Harrisburg, PA 17120  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)  
*Counsel for I&E*

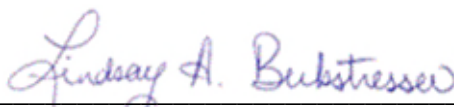
John W. Sweet, Esq.  
Ria M. Pereira, Esq.  
Elizabeth R. Marx, Esq.  
Lauren N. Berman, Esq.  
Levi A. Phillips, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
*Counsel for CAUSE-PA*

Joseph L. Vullo, Esq.  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Counsel for Pennsylvania Weatherization  
Providers Task Force*

Todd M. Pappasergi, Esq.  
Pennsylvania Independent Oil & Gas  
Association  
100 Allegheny Drive, Suite 104  
Warrendale, PA 15086  
[todd@pioga.org](mailto:todd@pioga.org)  
*Counsel for PIOGA*

Todd S. Stewart, Esq.  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Dated: June 15, 2026

  
\_\_\_\_\_  
Lindsay A. Berkstresser

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|   |   |                            |
|---|---|----------------------------|
| Pennsylvania Public Utility Commission, <i>et al.</i> | : |                            |
|   | : |                            |
|   | : | Docket Nos. R-2026-3060855 |
| v.  | : | C-2026-3061455             |
|   | : | C-2026-3061593             |
|   | : | C-2026-3061685             |
| Peoples Natural Gas Company LLC                       | : |                            |

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**OBJECTIONS OF  
PEOPLES NATURAL GAS COMPANY LLC TO  
THE STATEMENT AND EXHIBIT OF RICHARD C. CULBERTSON**

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**TO ADMINISTRATIVE LAW JUDGE CHARECE Z. COLLINS:**

Peoples Natural Gas Company LLC (“Peoples” or the “Company”) hereby files these Objections pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) regulations at 52 Pa. Code § 5.401(a), to exclude certain portions of the testimony and exhibit submitted by Richard C. Culbertson at the June 3, 2026 Public Input Hearing. Peoples objects to portions of Mr. Culbertson’s testimony and Culbertson Exhibit 1 because the information contained therein is irrelevant to Peoples’ rates and service.

In support thereof, Peoples states as follows:

**I. BACKGROUND**

1. The above-captioned proceeding was initiated on March 27, 2026 when Peoples filed with the Pennsylvania Public Utility Commission (“Commission”) Original Tariff Gas – Pa PUC No. 49 (“PA PUC No. 49”) and Original Tariff Gas – Pa PUC No. S-5 (“PA PUC No. S-5”), along with supporting information required by 52 Pa. Code §§ 53.52 and 53.53, to become

effective May 26, 2026. The Company's filing reflects an overall revenue increase of approximately \$163.2 million annually.

2. On April 16, 2026, the Commission entered an Order suspending PA PUC No. 49 and PA PUC No. S-5 by operation of law until December 26, 2026, unless otherwise directed by Order of the Commission.

3. On May 20, 2026, ALJ Collins issued an In-Person & Telephonic Public Input Hearings Notice, providing that in-person public input hearings would be held on June 2, 3, and 10, 2026, at 1:00 PM and 6:00 PM each day, and that telephonic public input hearings would be held on June 11, 2026, at 1:00 PM and 6:00 PM.

4. On June 2, 2026, in advance of the June 3, 2026 public input hearings, Mr. Culbertson provided the ALJ with a copy of his "sworn written testimony," which was labeled as "Culbertson Exhibit 1".

5. Among the other scheduled public input hearings, a public input hearing was held on June 3, 2026. During the public input hearing, Mr. Culbertson testified and submitted Culbertson Exhibit 1 for the record. ALJ Collins indicated that she would allow Peoples until June 15, 2026 to submit any written objections to Mr. Culbertson's written statement and exhibits. Tr. at 128.

6. Peoples hereby submits these objections to Mr. Culbertson's written statement and exhibits.

## **II. OBJECTIONS**

### **A. SPECIFIC OBJECTIONS**

#### **1. Objections to the Statement of Richard C. Culbertson**

23. Mr. Culbertson provided a lengthy oral statement at the June 3, 2026 public input hearing. As explained below, several portions of Mr. Culbertson’s statement are objectionable and should be excluded from the record.

24. Peoples objects to the following portions of Mr. Culbertson’s statement because they are irrelevant to the rates and service of Peoples:

- Portions of Mr. Culbertson’s testimony in which he discusses whether he is an expert in asset management. *See* Tr. at 73, line 8 through 76, line 14, and 79, lines 16-23.
- Portions of Mr. Culbertson’s testimony in which he testifies about his involvement in a rate case filed by Columbia Gas of Pennsylvania (“Columbia”). *See* Tr. at 76, line 15 through 79, line 15.
- The portion of Mr. Culbertson’s testimony in which he discusses the Commission’s compliance with The Constitution of Pennsylvania, including Article VIII. Pa. Const. art. VIII; *See* Tr. at 85, line 2 through 86, line 3, and 89, lines 13-25.
- Portions of Mr. Culbertson’s testimony in which he discusses any incidents, audits, or investigations that occurred that do not pertain to Peoples, including Mr. Culbertson’s statements about “Pronto Plumbing, [and UGI] Utilities,” his “problems” with Columbia, an explosion in Massachusetts, and an explosion in Bristol, Pennsylvania. Tr. at 91, lines 3-24; at 102, lines 20-23; at 103, lines 3-6 and 10-25; and at 104, lines 1-4.
- Portions of Mr. Culbertson’s testimony in which he discusses the applicability of federal laws and regulations to the Commissions’ or utilities’ actions, including the Chief Financial Officers Act of 1990 and Title 2 of the Code of Federal Regulations. Tr. at 93, line 1 through 94, line 4; at 95, lines 20-21; at 97, lines 18-25; and at 98, lines 18-23.

## **2. Objections to Culbertson Exhibit 1.**

26. Culbertson Exhibit 1 is an eight-page written statement authored by Mr. Culbertson. As explained below, several portions of Culbertson Exhibit 1 are objectionable and should be excluded from the record.

27. Peoples objects to the following portions of Culbertson Exhibit 1 because they are irrelevant to the rates and service of Peoples:

- The portions of Mr. Culbertson’s testimony on pages 1-3 of Culbertson Exhibit 1 in which he discusses whether he is an expert in asset management.
- The portions of Mr. Culbertson’s testimony on page 2 of Culbertson Exhibit 1 in which he testifies about his involvement in a rate case filed by Columbia.
- Statement on page 5 of Culbertson Exhibit 1 regarding an informal investigation involving “Pronto [Plumbing]/UGI Utilities.”
- Portions of Culbertson Exhibit 1 at pages 6-7 pertaining to the Chief Financial Officers Act of 1990, the Securities and Exchange Act of 1934, Title 2 of the Code of Federal Regulations.
- Statement in Culbertson Exhibit 1 on page 8 regarding a gas-related incident on December 23, 2025 in Bristol, Pennsylvania.

28. Peoples has provided proposed markups to Culbertson Exhibit 1 pursuant to these objections and attached it here as **Appendix A**.

## **B. ARGUMENT IN SUPPORT OF OBJECTIONS**

29. Portions of Mr. Culbertson’s testimony and Culbertson Exhibit 1 should be excluded because they are irrelevant to Peoples’ rates and service.

30. Relevant evidence is “that which, tends to establish some fact material to the case, or which tends to make a fact at issue more or less probable.” *Commonwealth v. Scott*, 389 A.2d 79, 82 (1978).<sup>1</sup> Irrelevant or immaterial evidence is not admissible. 66 Pa. C.S. § 332(b). The Commission has excluded evidence on the basis that the evidence is not relevant to the scope of the proceeding. See e.g., *Investigation of the Philadelphia Area Taxicab Self-Insurance Program*, 1989 Pa. PUC LEXIS 206 (1989) (excluding evidence that was “not germane to the limited scope of the investigation...”).

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<sup>1</sup> See Pa.R.E. 401 (“Evidence is relevant if: (a) it has any tendency to make a fact more or less probable than it would be without the evidence; and (b) the fact is of consequence in determining the action.”); *Ecker v. Amtrak*, 2015 Phila. Ct. Com. Pl. LEXIS 98 (Mar. 13, 2015), *affirmed*, 2015 Pa. Super. Unpub. LEXIS 3615 (Pa. Super. 2015); *Parr v. Ford Motor Co.*, 109 A.3d 682 (Pa. Super. 2014), *appeal denied*, 2015 Pa. LEXIS 1150 (Pa. 2015). Even if evidence is relevant, such evidence may be excluded “if its probative value is outweighed by a danger of one or more of the following: unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence.” *Parr*, 109 A.3d at 697 (quoting Pa.R.E. 403).

30. Mr. Culbertson presented information that does not pertain to the Company's rates or service.

31. Specifically, Mr. Culbertson testified about his credentials as an expert in asset management as it relates to his involvement with a rate case filed by Columbia, and the ALJs' disposition of his testimony in that proceeding. *See* Tr. at 73-79; Culbertson Exhibit 1 at 1-3.

32. The disposition of a rate case is based on the evidentiary record and is extremely fact specific. Any exploration of facts involving the expenses, investment, or recommended decision of another utility's rate case, especially as it pertains to Mr. Culbertson's background in asset management, would overburden this record with irrelevant information.

33. Mr. Culbertson also provided testimony and information with Culbertson Exhibit 1 as to audits, investigations, and incidents involving other utilities and entities which are not Peoples and are not associated with Peoples, including Pronto Plumbing, UGI Utilities, Columbia, a gas-related explosion in Massachusetts, and a gas-related explosion in Bristol, Pennsylvania. Tr. at 91, 102-103; Culbertson Exhibit 1 at 5 and 8.

34. It does not appear that Mr. Culbertson averred that Peoples was involved in these events. Indeed, given the information provided and upon reasonable investigation, Peoples was not involved in these events.

35. Any investigations, audits, or incidents referred to by Mr. Culbertson that pertain to utilities that are not Peoples and/or pertain to incidents outside of the Company's service territory are not relevant to the evidentiary record here or disposition of the instant base rate case. Additionally, the expenses and investments of other utilities within Pennsylvania or in other states are not relevant to the expenses and investments needed for Peoples to provide safe and reliable service to its customers and meet the Company's regulatory requirements.

36. Mr. Culbertson also discussed the Commission's compliance with The Constitution of Pennsylvania, including Article VIII. Pa. Const. art. VIII; *See* Tr. at 85, 89.

37. However, whether the Commission itself is in compliance with The Constitution of this Commonwealth is not relevant to the disposition of the instant base rate case, nor is this rate case the proper vehicle by which to provide such comments.

38. Finally, Mr. Culbertson provided testimony as to the applicability of the Chief Financial Officers Act of 1990, the Securities and Exchange Act of 1934, Title 2 of the Code of Federal Regulations. Tr. at 93-95 and 97-98; Culbertson Exhibit 1 at 6-7. Yet, the base rate case that is the subject of the above-captioned proceeding is not decided under the Chief Financial Officers Act of 1990 or Title 2 of the Code of Federal Regulations.

39. These laws as cited in Mr. Culbertson's testimony and in Culbertson Exhibit 1 are not relevant to Peoples' base rate proceeding before the Commission.

40. For the reasons stated above, Mr. Culbertson's testimony and exhibit should be limited to only those portions which relate to Peoples' base rate increase, the rates charged, and service provided by Peoples.

**III. CONCLUSION**

WHEREFORE, Peoples Natural Gas Company LLC respectfully requests that Administrative Law Judge Charece Z. Collins exclude the portions of Mr. Culbertson's statement provided at the June 3, 2026 public input hearing and certain portions of Culbertson Exhibit 1 identified in these Objections from the record in this proceeding.

Respectfully submitted,



Meagan Moore (ID # 317975)  
PNG Companies LLC  
375 North Shore Drive  
Pittsburgh, PA 15212  
Phone: 412-208-6527  
Email: meagan.moore@peoples-gas.com

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Anthony D. Kanagy, I.D. No. 85522  
Michael W. Gang, I.D. No. 25670  
Lindsay A. Berkstresser, I.D. No. 318370  
Post & Schell, PC  
17 North Second Street  
12th Floor  
Harrisburg, Pennsylvania 17101-1601  
Phone: 717-612-6034  
Fax: 717-731-1985  
E-mail: akanagy@postschell.com  
mgang@postschell.com  
lberkstresser@postschell.com

Hayley E. Wilburn (ID # 336055)  
Post & Schell, P.C.  
301 Grant Street  
Suite 3010  
Pittsburgh, PA 15219  
Phone: 412-506-6362  
E-mail: hwilburn@postschell.com

Dated: June 15, 2026

*Counsel for Peoples Natural Gas Company LLC*

# **Appendix A**

## Pennsylvania Public Utility Commission Public Hearing June 3, 2026

Peoples Natural Gas Company LLC (Peoples Gas), Docket [R-2026-3060855](#)

Introduction: Richard C. Culbertson, 1430 Bower Hill Road, Pittsburgh, PA 15243

Phone 609-410-0108 Richard.C.Culbertson@gmail.com

I am an interested party in this proposed rate increase from several perspectives. My residence at 1430 Bower Hill Road in Pittsburgh is served by Peoples.

**Ownership** of several properties serviced by Peoples Gas, including one here in Ross Township.

~~Public service as an asset management expert. (“See something, say something.”) As evaluated and identified as an **asset management expert** in the **Government Accountability Office** Report *FEDERAL REAL PROPERTY ASSET MANAGEMENT* <https://www.gao.gov/assets/d1957.pdf>, see pages 48 and 49.~~

~~I have been heavily involved in International Asset Management Standards since 2001 and am the past Chair and current board member of to the ASTM E53 Asset Management Committee, e.g., Standard ASTM E2279 ... Guiding Principles of Property Asset Management (versions 02, 09, 15, 20, and 25) (Initially Co-authored (a DOE director) and Technical Leader adopted and required in DoD in their DOD Instruction 5000.64 ACCOUNTABILITY AND MANAGEMENT OF DOD EQUIPMENT AND OTHER ACCOUNTABLE PROPERTY <https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/500064p.pdf>~~

~~ASTM standards have been used by gas utilities for many years, e.g., *ASTM D2513 Standard Specification for Polyethylene (PE) Gas Pressure Pipe, Tubing, and Fittings.* (1966)~~

~~I am a board member and leader in the U.S. ISO Technical [Standards] Committee 251, Asset Management, which is responsible for the international standard ISO 55000, Asset Management, and will represent ANSI in Kyoto, Japan, in July 2026 regarding improvements to the ISO 55010 standard and intangibles.~~

~~ANSI API 1173 Pipeline Safety Management Systems. This Standard references ISO 55000 Asset Management and ISO 9000 Quality Management. ISO 55000 Asset Management references ASTM 2279 Guiding Principles of Property Asset Management.~~

~~I am a Board member of Asset Leadership Network. <https://www.assetleadershi79p.net/>.~~

~~I am also on the board of the National Property Management Association— for close to forty years.—~~

~~I was Lockheed Martin’s lead subject matter expert in asset management for many years.—~~

~~I am not an attorney, nor a Certified Public Accountant. Public utility management is primarily focused on asset management.—~~

~~Over 50 years of asset management responsibility at General Electric and Lockheed Martin, as well as real estate investments and experience with multiple gas utilities in multiple states, all give me a unique perspective on public utility operations.—~~

~~Gas utility management and governance are all about various forms of asset management.—~~

~~I am providing this level of detail because last year on this day, I provided the details of being an asset management expert in a footnote, and the Administrative Law Judges Jeffrey A. Watson and Chad L. Allensworth portrayed my sworn testimony in the Columbia Gas rate case.—~~

~~***Richard Gulbertson, a Pittsburgh resident, Columbia Gas customer, and self-described asset management expert, also provided testimony. Mr. Gulbertson provided the Parties with a document purported to be his written testimony. Page 14. <https://www.puc.pa.gov/pcdocs/1897286.pdf>***~~

~~**It appears the intent of the Pennsylvania Public Utility Law Judges was to discount my sworn public testimony by harming my reputation before the Commission. I, or any other customer, do not deserve this treatment in sworn public testimony before the Commission.—**~~

~~Once I found out what the Administrative Law Judges did in their Recommended Decision, I complained to the PUC Secretary. My complaint was not recorded in the record. **Good organizations do not work this way!**~~

~~**I believe the Commission owes me, as a customer, a formal retraction and an apology. Artificial Intelligence can report that my expertise is “self-described.”— Purported means what is said is not believable.**~~

~~Deliberate acts by PUC employees that violate the public's trust should be met with deliberate acts by the Commission.—~~

~~—~~

~~**To further substantiate my credentials as an asset management expert, I have been personally invited to three recent Pipeline and Hazardous Materials Safety**~~

~~Administration (PHMSA) events in Washington, D.C., at the J.W. Marriott, another DOT headquarters, and another online meeting.~~

**High utility rates from Peoples Gas threaten my quality of life, both quantitatively and qualitatively, reducing property asset value, income, and well-being.**

These proposed rate increases, close to 14%, will negatively impact the quality of life for these renters and our community and appear unjust and unreasonable.

My understanding of the condition of the PAPUC and its large public gas and electric utilities is generally **consistent with Governor Shapiro’s understanding.**

<https://s3.documentcloud.org/documents/28086151/2026429-jds-utility-ceos-letter-v2.pdf>

**GOVERNOR JOSH SHAPIRO** Office of the Governor | Harrisburg, PA | [www.pa.gov](http://www.pa.gov) April 29, 2026

Dear Utility Leaders:

As you are no doubt aware, many of your customers across the Commonwealth are experiencing markedly higher utility costs. Rising utility bills have themselves become drivers of inflation. ... Last year alone, 13 Pennsylvania utilities requested \$975 million in higher rates after those very same utilities had earned a total of \$1.4 billion in profits in 2024.

We have reached a tipping point, and this is a moment to put your customers first and change the behaviors causing rate increases. As I’ve expressed publicly and privately, **I believe the 20th century utility model is broken**—we can no longer simply prioritize corporate profitability to drive infrastructure development. Rather, **we must be laser focused on delivering on the actual needs of our communities**. As I stated clearly in my Budget Address in February, **Pennsylvania consumers should not be asked to pay a single dollar more than is needed to support a safe and reliable utility system.**

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**And all too often the outcome of this administrative process is shrouded in “black box” settlements, that do not provide the public with transparency about costs they will have to pay.**

**Public utility rate-making requires due process – black box settlements are not part of that process.**

Due process means **the process that is owed or promised to me in accordance with the law.**

Many in this room swore an oath that ***I will support, obey and defend the Constitution of the United States and the Constitution of this Commonwealth...***

One of the objectives of these hearings is to arrive at just and reasonable rates for

customers, and Peoples Gas. I want to be treated justly and fairly, and I want the same for Peoples Gas.

I am providing facts and applicable law as I know them.

PUC Order to investigate: <https://www.puc.pa.gov/pdocs/1923354.pdf>

In part:

*Investigation and analysis of this proposed tariff filing and the supporting **data indicate that the proposed changes in rates, rules, and regulations may be unlawful, unjust, unreasonable, and contrary to the public interest.** It also appears that consideration should be given to the reasonableness of Peoples's **existing rates, rules, and regulations; THEREFORE,***

**IT IS ORDERED:**

1. That an **investigation** on Commission motion be, and hereby is, instituted to **determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained in the proposed Original Tariff Gas – Pa PUC No. 49 and Original Tariff Gas – Pa PUC No. S-5.**

**Now, who is conducting this investigation, and who is qualified to determine whether the costs included in the rate base are allowable?** What accounting and audit standards are to be used?

Some help from Pennsylvania voters in **1968**. *ARTICLE VIII TAXATION AND FINANCES 10. Audit.*

*The financial affairs of any entity funded or financially aided by the Commonwealth, **and all departments, boards, commissions, agencies, instrumentalities, authorities and institutions of the Commonwealth, shall be subject to audits made in accordance with generally accepted auditing standards.***

*Any Commonwealth officer whose approval is necessary for any transaction relative to the financial affairs of the Commonwealth **shall not be charged with the function of auditing that transaction after its occurrence.***

(Apr. 23, 1968, P.L.App.7, Prop. No.4) The second paragraph means the auditor or officials cannot audit or judge their own prior work. In auditing, this is referred to as a "self-review threat," which raises concerns about independence and objectivity. Self-review threats can erode public trust in the fairness and impartiality of the Commission and administrative law judges.

PA Title 66 § 308.2. Other bureaus, offices and positions ... to perform the following functions:

(6) **Insure adequate maintenance, safety and reliability of utility networks.**

(8) **Conduct financial, management, operational and special audits.**

(11) **Take appropriate enforcement actions, including rate proceedings, service proceedings and application proceedings, **necessary to insure compliance with this title, commission regulations and orders.****

4. That this **investigation shall include consideration of the lawfulness, justness, and reasonableness of the Peoples Natural Gas Company LLC's existing rates, rules, and regulations.**

5. That the case be assigned to the Office of Administrative Law Judge **for the prompt scheduling of such hearings** as may be necessary culminating in the issuance of a Recommended Decision.

**How can this proceeding arrive at a just and reasonable rate without those audits or investigations?**

What is the timeline between Order 1. and 4., and 5? Who are the empowered investigators who have free access to People's operations? It is not the Administrative Law Judge. It is not the complainants or their consultants. It is not public. Requirements 1. and 4. are dead ends.

Who is writing the conclusions for Orders 1. and 4.?

Financial attestation audits provided decision-makers with some reasonable assurance.

The Commission has not completed the required audits in the manner described since 1968.

Fair and reasonable rates cannot be established without independent, competent audits.

The Commission is simply not prepared to arrive at just and reasonable rates for Peoples' customers.

**Informal Investigations by the Commission – we are seeing an informal investigation into an incident that occurred in December 2022. The PUC opened an investigation in 2025 and resolved it in the last month of December 2025 and January 2026. (Pronto Plumbing/UGI Utilities)**

The public should be concerned with the PUC's timeliness and quality of work!

How many financial experts are among the Commissioners? From their resumes, zero.

~~How many are aware of the Federal **Chief Financial Officers Act of 1990**?~~

~~Who is this person? -- Eric Ueland~~

~~(A) The **Chief Financial Officers (CFO) Act of 1990** is landmark federal legislation that overhauled the financial management of the U.S. government. It established Chief Financial Officers across major federal agencies, created the Office of Federal Financial Management (OFFM), and explicitly designated the Deputy Director for Management (DDM) within the Office of Management and Budget (OMB) as the **chief government official responsible for financial management** <https://www.congress.gov/bill/101st-congress/house-bill/5687> <https://www.congress.gov/bill/101st-congress/house-bill/5687/text>~~

~~The work product of OMB includes:~~

~~**2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards** <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1> PA and the PUC receive Federal Awards (grants).~~

~~The Federal Acquisition Regulations, The Cost Accounting Standards, The Cost Principles, OMB Circulars.~~

Some may claim the Pennsylvania Public Utility Commission and its commissioners are independent. They are independent only to the extent they obey their oath of office, applicable laws, regulations, and standards, and their orders.

*The proposed changes in rates, rules, and regulations are calculated to produce \$163.2 million (13.8%) in additional annual revenues, ...*

The magnitude of Peoples proposed increase is about the same as Pennsylvania's Low-Income Home Energy Assistance Program (LIHEAP) Federal funded **projected budget of \$173.25 million**. [https://www.pa.gov/content/dam/copapwp-pagov/en/dhs/documents/services/assistance/documents/heating-assistance\\_liheap/2026-liheap-state-plan.pdf](https://www.pa.gov/content/dam/copapwp-pagov/en/dhs/documents/services/assistance/documents/heating-assistance_liheap/2026-liheap-state-plan.pdf)

**Facts and circumstances that must be considered in this rate case include the following:**

~~No audits, no apparent understanding and recognition of the Chief Financial Officers Act of 1990.~~ Where are accountants, audits of compliance with Cost Principles and Cost Accounting Standards, use of the GAO Yellow Book (audits), and the GAO Standards for Internal Control – GAO Green Book?

The due process of Pennsylvania law “66 Pa.C.S. § 1319 (1967) “[T]he commission shall allow the public utility to recover all prudent and reasonable costs ... **only in accordance with appropriate accounting principles.**”

Only is a big word, especially beginning in 1967!

Peoples STATEMENT OF REASONS [https://www.peoples-gas.com/sites/default/files/2026-04/png-2026-rate-case-statement-of-reasons-final\\_1.pdf](https://www.peoples-gas.com/sites/default/files/2026-04/png-2026-rate-case-statement-of-reasons-final_1.pdf)

*Peoples makes this tariff filing principally to allow it to earn a fair return on investments used and useful to continue to provide safe and reliable service to the public and to support its infrastructure modernization programs designed to enhance safety and reliability.*

**1. Fair return on investments used to serve the public**

~~(This type of arrangement is commonly referred to as – Cost plus percentage of cost, which is not to be used per 2 CFR 200.324(c) as profit comes from spending rather than desired performance.–~~

**2. Support for the Company’s accelerated infrastructure replacement program**

(Accelerated costs are not necessary, reasonable, or prudent, and not in the best interest of customers. These costs must be identified as unallowable costs and subtracted from the rate base. ~~Reasonable means “as would satisfy prudent officials in the conduct of their own affairs.” – Securities and Exchange Act of 1934)~~

The PUC’s rate cases process, which establishes rates through black-box settlements, including this rate case, does not conform to this long-standing fundamental Pennsylvania law.

Establishing rates by those without expertise in the appropriate accounting principles cannot result in just and reasonable settlements. This is not a place for unprofessional accounting or auditing work. **Where are the independent, competent, and professional assurances that this proposed rate increase is to recover only just and reasonable costs, that are free of waste, fraud, abuse, mismanagement, and unsafe conditions?**

**From my experience and observation, it does not appear that customers are given due process in establishing Peoples utility rates. Different elements of an internal control**

framework are missing, ignored, or unreliable.

Finally, Peoples and the Commission do not appear to have adopted the API 1173 Pipeline Safety standard. Not adhering to standards puts customers at risk.

~~If the Commission had paid more attention to utilities being able to turn off gas in emergencies, the people who died in Bristol, Pennsylvania, on December 23, 2025, may have been alive today.~~

**In conclusion,** I recommend that the PUC pause this rate case until it establishes an effective, efficient, proper, and due process in accordance with the Pennsylvania Public Utility Code. This includes independent and reliable audits conducted by competent third-party auditors to ensure that Peoples has effective internal controls over its operations, including effective and efficient operations, reliable reporting (financial and non-financial), and compliance with applicable laws, regulations, standards, and orders. In addition, assurances that the rate base is free of waste, fraud, abuse, and mismanagement, and unsafe conditions.

This concludes my testimony.



Richard C. Culbertson  
1430 Bower Hill Road  
Pittsburgh, PA 15243  
[Richard.c.culbertson@gmail.com](mailto:Richard.c.culbertson@gmail.com)  
609-410-0108