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August 28, 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: Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56
Docket No. L-2025-3058767

Dear Secretary Homsher:

Enclosed for filing please find Columbia Gas of Pennsylvania, Inc.'s Comments in response to the Notice of Proposed Rulemaking (the "NOPR") dated February 19, 2026, on Amendments to 52 Pa. Code Chapter 56 in the above referenced docket.

Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "Emily Farah", written over a printed name.

Emily Farah

/kak

Enclosure

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**COMMENTS OF COLUMBIA GAS OF PENNSYLVANIA, INC.
ON THE RULEMAKING TO FURTHER AMEND THE
PROVISIONS OF 52 PA. CODE CHAPTER 56**

I. INTRODUCTION

Columbia Gas of Pennsylvania, Inc, (“Columbia” or the “Company”) appreciates the opportunity to provide comments in response to the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Notice of Proposed Rulemaking (the “NOPR”) at Docket No. L-2025-3058767, proposing to amend 52 Pa. Code Chapter 56 to incorporate the provisions of the former Chapter 14. The NOPR established a 60-day comment period and a 30-day reply comment period. The NOPR was published in the *Pennsylvania Bulletin* on May 30, 2026, at 56 Pa.B. 3136, resulting in a comment due date of July 29, 2026, and a reply comment due date of August 28, 2026.

On June 5, 2026, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) and the Tenant Union Representation Network (“TURN”) jointly requested an additional 45 days to file comments. On June 12, 2026, the Office of Small Business Advocate filed a letter in support of the request, and on June 16, 2026, the Energy Association of Pennsylvania (“EAP”) filed a letter clarifying the requested extension dates.

By Secretarial Letter dated June 18, 2026, the Commission granted the requested extension and revised the comment due date to August 28, 2026, and the reply comment due date to October 13, 2026.

Columbia now submits these Comments in accordance with the schedule established by the Commission. Columbia fully supports the Comments submitted by the EAP in this proceeding and incorporates those Comments herein by reference. To the extent the Company's Comments and those of the EAP address common issues, Columbia respectfully requests that the Commission consider them in a consistent and complementary manner.

II. COMMENTS

A. 52 Pa. Code § 56.181

Columbia does not support the proposed insertion of the phrase “and subsequent bills which are not in dispute” into 52 Pa. Code §§ 56.181(1)-(2). While the Company understands that this language derives from the former Section 1410 (66 Pa. C.S. § 1410) its incorporation into Section 56.181 produces an unintended consequence that undermines the very purpose of the former Chapter 14 that this rulemaking seeks to preserve.

By obligating the disputing party to pay only “subsequent bills which are not in dispute,” the proposed language opens the door for a customer to dispute every bill rendered during the pendency of an informal or formal complaint. A customer who continually disputes each successive bill is ineligible for termination for the entire duration of the proceeding, notwithstanding the customer’s ability to pay. The natural consequence of this is the accumulation of a substantial unpaid balance for which the customer becomes responsible only at the conclusion of the complaint, by which time the arrearage may be significant and, in many instances, uncollectible.

To preserve the customer’s right to contest genuinely disputed charges while safeguarding against the accumulation of large, potentially uncollectible balances, Columbia respectfully proposes that the Commission decline to adopt the phrase “and subsequent bills which are not in

dispute” and instead provide that charges accruing during the pendency of the complaint remain payable, subject to refund should the fact finder determine that such charges or a portions of such charges were incorrectly rendered. This alternative maintains the customer’s protection by ensuring refund of any amount improperly billed during the pendency of the informal or formal complaint, while preventing a customer from escaping the timely payment obligation through disputes of successive bills. This approach is consistent with the purpose of the former Chapter 14 and with the Commission’s objective, articulated throughout the NOPR, of ensuring timely collections and reducing public utilities’ uncollectible accounts.

B. 52 Pa. Code § 56.22

Columbia respectfully rejects the proposed insertion of the following language into Section 56.22(d): “A public utility shall waive late payment charges on any customer accounts if the charges were improperly assessed.” Although the Company appreciates that this language derives from the former Section 1409 (66 Pa. C.S. § 1409) its incorporation into 52 Pa. Code § 56.22(d) is unnecessary because the substance of the proposed language is already accounted for in the Commission’s existing regulations.

The proposed sentence is redundant of the existing framework of Section 56.22, which already governs the accrual and waiver of late payment charges and vests the public utility with the authority to waive such charges. A public utility that has improperly assessed a late payment charge has, by definition, assessed a charge that did not properly accrue under Section 56.22, and the existing regulation already permits the waiver of such charges.

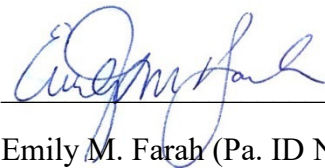
The proposed language is further redundant of Section 56.181(3), which addresses the public utility’s duty to pay interest whenever an overpayment is found and thereby already provides the mechanism by which a customer is made whole for amounts improperly billed, including improperly assessed late payment charges. Between the existing waiver authority in Section

56.22 and the overpayment and interest provisions of Section 56.181(3), the Commission's regulations already ensure that a customer is not required to bear the cost of an improperly assessed late payment charge.

III. CONCLUSION

Columbia Gas of Pennsylvania, Inc. appreciates the opportunity to provide these Comments on the proposed amendments to Chapter 56 of the Commission's regulations. The Company supports the Commission's efforts to incorporate the provisions of the former Chapter 14 of the Public Utility Code into Chapter 56 to provide regulatory certainty following the sunset of the former Chapter 14. Columbia looks forward to continuing to participate in this rulemaking process.

Respectfully submitted,



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