
GA BIBIKOS LLC

relentless. advocacy. period.

VIA ELECTRONIC FILING

George A. Bibikos
(717) 580-5305
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Secretary Matthew L. Homsher
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

August 27, 2026

Re: Kelsey Collis v. Expand Energy Corporation, Docket No. C-2026-3062736

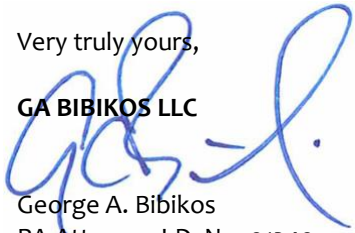
Dear Secretary Homsher:

I have enclosed for filing with the Commission a "Notice of Limited Appearance" on behalf of Expand Energy Corporation, which is not a public utility, in order to contest jurisdiction. I have served a copy of this document in accordance with the attached certificate of service.

Should you have any questions, please feel free to contact me.

Very truly yours,

GA BIBIKOS LLC



George A. Bibikos
PA Attorney I.D. No. 91249
Counsel for Expand Energy Corporation

Enclosures

c: Administrative Law Judge Erando Vero (via email w/encl.)
Certificate of Service (via email w/encl.)
Client (via email w/encl.)
File

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kelsey Collis

v.

Expand Energy Corporation

:
:
:
:
:

Docket No. C-2026-3062736

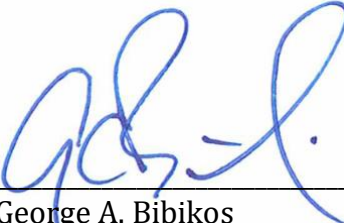
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing upon the parties and in the manner listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA EMAIL

Kelsey Collis
272 Railroad Lane
Wyalusing, PA 19512
kelseycollis7297@gmail.com

August 27, 2026



George A. Bibikos

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kelsey Collis	:	
	:	
v.	:	Docket No. C-2026-3062736
	:	
Expand Energy Corporation	:	

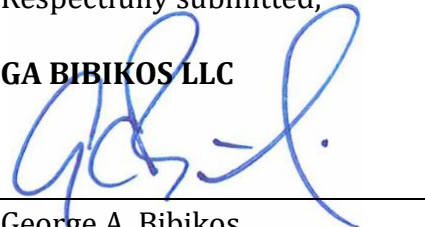
NOTICE OF LIMITED APPEARANCE

Please enter my appearance as counsel for Expand Energy Corporation (“Expand”) for the limited purpose of contesting the jurisdiction of the Public Utility Commission over Expand as a respondent to the consumer complaint filed in the above matter. As counsel explained in the email to the complainant and the Presiding Officer in Attachment “A,” Expand is a producer of natural gas and exempt from the definition of a “public utility” under Section 102 of the Public Utility Code, 66 Pa.C.S. § 102. The Commission therefore does not have jurisdiction over Expand, and the complainant’s claims otherwise are not within the jurisdiction of the Commission to resolve. Expand reserves all rights and objections and appears here under protest and without waiver of any objections to jurisdiction or otherwise. I am authorized to accept service on behalf of Expand and request electronic copies of each document issued by the Commission or served by a party in this matter.

August 27, 2026

Respectfully submitted,

GA BIBIKOS LLC



George A. Bibikos
5901 Jonestown Rd. #6330
Harrisburg, PA 17112
(717) 580-5305
gbibikos@gabibikos.com

Counsel for Expand Energy Corporation

Attachment "A"

From: George A. Bibikos gbibikos@gabibikos.com 
Subject: Kelsey Collis v. Expand Energy Corporation, Docket No. C-2026-3062736
Date: August 14, 2026 at 8:44 AM
To: evero@pa.gov
Cc: kelseycollis7297@gmail.com
Bcc: George A. Bibikos gbibikos@gabibikos.com



**FW EXTERNAL Re Expand
Energy copy.pdf**
74 KB



Your Honor:

George A. Bibikos here. I represent Expand Energy Corporation ("Expand"). Expand informed me of this pending case two days ago and engaged me yesterday to address it.

I will file a formal appearance on the docket in the coming days if necessary, but I write at the outset to let you and Ms. Collis know that the PUC does not have jurisdiction here such that the case should not move forward. Ms. Collis is copied on this email.

To illustrate, the formal complaint alleges an issue with Expand transferring gas royalty interests to Ms. Collis pursuant to oil and gas lease agreements and asks the PUC to impose fines for alleged delays and damages for alleged emotional distress.

However, Expand is a producer of natural gas. The Commission only has jurisdiction over "public utilities" under Section 102 of the Public Utility Code, 66 Pa.C.S. sec. 102. Expand is not a "public utility" under Section 102 of the Public Utility Code, 66 Pa.C.S. sec. 102(2)(iii), which expressly exempts from the definition of "public utility" any producers of natural gas like Expand. The Commission therefore lacks jurisdiction over Expand and the complaint because Expand is not a "public utility."

In addition, the transfer of Ms. Collis's royalty interests about which she complained already occurred some months ago, which she acknowledged in the attached email exchange with Expand representatives. Expand considered the matter resolved in May such that Ms. Collis would withdraw the complaint or file a certificate of satisfaction (with which Expand offered to assist some months ago and in fact did assist).

Although Expand and Ms. Collis resolved the matter themselves, Expand learned this week that, despite Ms. Collis's earlier representations, she wishes to move forward based on the fact that other companies (not Expand and over which Expand has no control) have not transferred royalty interests to her. She also requests that the PUC impose fines against Expand for alleged delay in transferring royalty interests and alleged damages for emotional distress.

Aside from the jurisdictional problem and the fact that Ms. Collis's complaint against others has no bearing on Expand, her claims to recover alleged damages regarding transfer of royalty interests also are outside the jurisdiction of the PUC to resolve. *Feingold v. Bell of Pennsylvania*, 383 A.2d 791, 794 (Pa. 1977).

Rather than engage in costly motions practice that will absorb the parties' and the Commission's resources unnecessarily, we ask that Ms. Collis reconsider her decision to move forward and instead agree to withdraw her complaint based on this information consistent with her prior representations. Unless Ms. Collis withdraws her complaint, Expand will be constrained to file and brief a dispositive motion, Ms. Collis will be forced to draft and file a formal response based on the law, and Your Honor will be compelled to review and consider everything even though the law clearly compels a conclusion that the Commission lacks jurisdiction over Expand and this complaint.

If Ms. Collis believes she has proper claims against Expand for delay or emotional distress, she must pursue them in a forum having appropriate jurisdiction, not here at the Commission.

Thank you for your consideration of this message. If you could reply to confirm receipt, I'd be grateful.

Thank you for your consideration of this message. If you could reply to confirm receipt, I'd be grateful.

Very truly yours,

George A. Bibikos (PA 91249)
Counsel for Expand Energy Corporation



George A. Bibikos | Managing Member
5901 Jonestown Rd. #6330 | Harrisburg, PA 17112
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[Web](#) | [X](#) | [LinkedIn](#) | [At the Well Weekly](#)

Send me files securely at [+lawyer | portal](#)

From: kelsey collis <kelseycollis7297@gmail.com>
Sent: Wednesday, August 12, 2026 2:32 PM
To: Whitney Donley <whitney.donley@expandenergy.com>
Cc: Chase Howell <chase.howell@expandenergy.com>
Subject: [EXTERNAL] Re: Expand Energy

Thank you for reaching out.

I am not closing or withdrawing my PUC complaint at this time. I intend to move forward with the complaint.

While I understand that Expand has transferred its interest that was the subject of the complaint, there are two other smaller companies that work with Expand, and all three companies share the same well on the property. The other two companies have not transferred their rights.

I will also be addressing the fact that it took over a year and a half for the interest to be transferred into my sister's and my names, despite multiple attempts to resolve the matter and going back and forth with multiple people throughout the process.

Until all three companies are on the same page and the rights and interests involving the shared well are fully addressed, I will be continuing with my PUC complaint. I believe these issues need to be fully resolved before I can consider closing the complaint.

Please let me know if you need any additional information from me regarding the complaint.

Thank you,
Kelsey

On Mon, Aug 10, 2026 at 11:02 AM Whitney Donley
<whitney.donley@expandenergy.com> wrote:

Ms. Collis,

Can you please call me at your earliest convenience? If we do not hear from you we will need to file a response to the complaint you filed. I understand you've previously spoken with Chase, and he explained that Expand has already transferred your interest that was the subject of the complaint.

Please either respond to this email confirming you do not wish to further prosecute your complaint against Expand, or call me to discuss at (405) 876-4296.



Whitney A. Donley

Assistant General Counsel - Upstream

Expand Energy Corporation

o: 405-876-4296

m: 405-664-1168

whitney.donley@expandenergy.com

expandenergy.com

From: Chase Howell <chase.howell@expandenergy.com>

Sent: Thursday, July 23, 2026 4:35 PM

To: KELSEYCOLLIS7297@GMAIL.COM

Subject: Expand Energy

Hi Kelsey,

We spoke a few weeks back about your royalty interests, and following up on our discussion.

I spoke with the Administrative Law Judge (Ms. Eranda Vero) assigned to the complaint you filed about closing the case. She said the easiest way to remove the case from the docket is for you to send her a simple email. I have drafted an example below, and provided her contact information. Her email is evero@pa.gov If you would copy me on the email I would appreciate it.

Example email:

Ms. Vero:

I have spoken to Expand Energy, and my complaint has been resolved. I no longer wish to prosecute the complaint that was filed at Docket No. C-2026-3062736 (Kelsey Collis v. Expand Energy Corporation). Please close my complaint accordingly.

Thank you,



Chase Howell

Supervisor - Land Administration

Expand Energy Corporation

o: 570-914-9044

chase.howell@expandenergy.com