
GA BIBIKOS LLC

relentless. advocacy. period.

VIA ELECTRONIC FILING

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

September 4, 2026

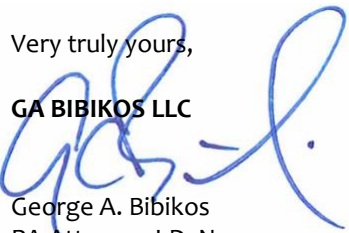
Re: Kelsey Collis v. Expand Energy Corporation, Docket No. C-2026-3062736

Dear Secretary Homsher:

I have enclosed for filing with the Commission on behalf of Respondent, Expand Energy Corporation, which is not a public utility, an "Answer" to a formal complaint and a "Motion to Dismiss for Lack of Jurisdiction and Request to Cancel Hearing." I have served a copy of the documents 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.	:	Docket No. C-2026-3062736
	:	
Expand Energy Corporation	:	

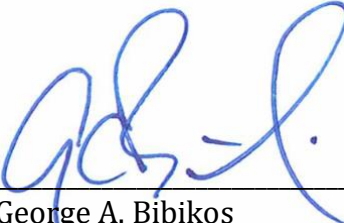
CERTIFICATE OF SERVICE

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

September 4, 2026



George A. Bibikos



Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Harrisburg, PA 17105-3265
EFILING - FILING DETAIL

Date Created	Filing Number
9/4/2026	3183368

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

Docket Number: C-2026-3062736

Case Description: Kelsey v. Expand Energy Corporation - Consumer Complaint

Transmission Date: 9/4/2026 11:30 AM

Filed On: 9/4/2026 11:30 AM

eFiling Confirmation Number: 3183368

File Name	Document Type	Upload Date
(e-file) Expand - Collis - Answer.pdf	Answer to Formal Complaint	9/4/2026 11:28:28 AM
(e-file) Expand - Collis - Motion to Dismiss and Cancel Hearing.pdf	Motion	9/4/2026 11:29:19 AM

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg PA 17120 a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

No paper submission is necessary for filings under 250 pages.

You can view a record of this filing and previous filings you have submitted to the PUC by using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kelsey Collis	:	
	:	
<i>Complainant,</i>	:	Docket No. C-2026-3062736
	:	
vs.	:	***You are hereby notified that you
	:	must file a responsive pleading within
Expand Energy Corporation,	:	20 days of service of this motion.***
	:	
<i>Respondent.</i>	:	

**MOTION TO DISMISS FOR LACK OF JURISDICTION
AND REQUEST TO CANCEL HEARING**

Pursuant to 52 Pa. Code §§ 5.102 and/or 5.103, respondent Expand Energy Corporation (“EXE” or “Expand”), a natural gas producer and not a public utility, files this motion to dismiss the consumer complaint filed by Ms. Kelsey Collis (complainant or “Ms. Collis”) in the above matter for lack of jurisdiction. EXE also requests that the Presiding Officer cancel the hearing scheduled for September 23, 2026, pending a ruling on this motion given the jurisdictional barrier and, separately, because Expand is unavailable on that date.

I. INTRODUCTION

1. The Presiding Officer should grant this motion, dismiss the case with prejudice, and cancel the scheduled hearing pending a ruling because the Commission lacks jurisdiction over both EXE and the claims in the complaint.

2. The complaint alleges that EXE delayed in transferring gas royalty interests and related payments to Ms. Collis pursuant to the parties’ oil and gas lease and asks the Commission to award damages for emotional distress caused by the allege delay. *See* Compl. attached at **Tab “A.”**

3. But the Commission only has jurisdiction over “public utilities” as defined by Section 102 of the Public Utility Code, 66 Pa.C.S. § 102.

4. As a producer of natural gas, EXE is expressly exempt from the definition of “public utility” under Section 102(2)(iii) of the Public Utility Code, 66 Pa.C.S. § 102(2)(iii).

5. The Commission therefore does not have jurisdiction because EXE is not a public utility.

6. In addition, although EXE already transferred royalty interests to Ms. Collis as she requested, she refused to withdraw the complaint and insisted on proceeding in order to recover emotional distress damages for delays in transferring her royalties.

7. But it is well-settled that the Commission has no jurisdiction to award breach-of-contract or tort/emotional-distress damages, let alone against a non-jurisdictional entity.

8. The Presiding Officer is therefore duty bound to dismiss the consumer complaint and cancel the hearing because the Commission has no jurisdiction here.

II. RELEVANT BACKGROUND

1. Expand is a producer of natural gas. *See* Answer ¶ 2, attached at **Tab “B”**; *see also* **Tab “C”** (Aff. ¶¶ 4-5).

2. Expand does not provide gas distribution service or any other public utility services to the public or otherwise. *See* Answer ¶ 3; *see also* **Tab “C”** (Aff. ¶ 6).

3. Expand is not a public utility and not certificated to provide public utility service. Answer ¶ 4; *see also* **Tab “C”** (Aff. ¶¶ 6-7).

4. Expand and complainant (as heir to her mother’s estate) are parties to an oil and gas lease. *See* Answer ¶ 5; **Tab “C”** (Aff. ¶ 8).

5. Ms. Collis requested that Expand transfer royalties to her as heir/successor in interest following probate of her mother's estate. *See* Compl. ¶¶ 4-5; Answer ¶ 6; Tab "C" (Aff. ¶ 9).

6. Ms. Collis filed a formal complaint with the Commission in April 2026 requesting transfer of royalty interests. *See* Compl. ¶¶ 4-5; Tab "C" (Aff. ¶ 11).

7. The complaint identifies "Expand Energy" as the gas utility involved. *See* Compl. ¶ 2.

8. The allegations are as follows:

I have asked numerous times to transfer the account into mine and my sisters name (Shelly Moyer) who are the new rightful owners of the mineral rights since my mother passed and we finalized the estate, and I have received push back and no communication for years. The company is still not up to date on payments from gas checks.

See Compl. ¶ 4.

9. The requested relief is as follows:

I would like all payments to be immediately released via direct deposit into my account. I would also like the company to be fined for not handling the matter in a timely way as well as pay back for emotional distress. I have been pushed from department to department and never been resolved of anything.

See Compl. ¶ 5 & 7.

9. Pursuant to her prior request, Expand had already transferred royalty interests to Ms. Collis in or about February 2026 (before she filed her complaint). *See* Answer ¶ 7 & Ex. A; *see also* Tab "C" (Aff. ¶ 12).

10. Ms. Collis expressly acknowledged that Expand's transfer of her royalty interest is complete. *See* Answer ¶ 8 & Ex. A; *see also* Tab "C" (Aff. ¶ 13).

11. Ms. Collis requested EXE's assistance drafting something to notify the Commission that the complaint was resolved, which EXE provided. *See Answer ¶ 8 & Ex. A; see also Tab "C" (Aff. ¶ 14).*

12. However, Ms. Collis informed Expand on August 12, 2026, that she intended to proceed with the claims for fines and emotional distress damages caused by Expand and another company (with which Expand is not affiliated and over which Expand has no control) for delays in transferring royalty interests to Ms. Collis. *See Answer ¶ 9 & Ex. A; see also Tab "C" (Aff. ¶ 15).*

13. On September 3, 2026, EXE filed its answer *nunc pro tunc* to close the pleadings together with this motion to dismiss and to cancel the hearing scheduled for September 23, 2026.

III. REASONS FOR GRANTING MOTION

14. The Presiding Officer should dismiss the consumer complaint against EXE and cancel the scheduled hearing because the Commission lacks jurisdiction over both EXE and the claims for relief that Ms. Collis requested.

15. A formal complaint is only proper if filed against a person (or company) over which the Commission has jurisdiction:

A person complaining of an act done or omitted to be ***done by a person subject to the jurisdiction of the Commission***, in violation, or claimed violation ***of a statute which the Commission has jurisdiction to administer, or of a regulation or order of the Commission***, may file a formal complaint with the Commission.

See 52 Pa. Code § 5.21 (emphasis added).

16. As described below, the complaint against Expand is improper because (a) the Commission lacks jurisdiction over Expand because it is not a "public utility" under the Code;

(b) the Commission lacks jurisdiction to award contract or tort damages against Expand for alleged delays in transferring her gas royalty interests; and (c) accordingly, the Commission should cancel the scheduled hearing for given the lack of Commission jurisdiction and other good cause.

A. *The Commission lacks jurisdiction over Expand because it is not a “public utility” under the Code.*

17. The Commission has jurisdiction over a “public utility” as defined by Section 102 of the Public Utility Code, 66 Pa.C.S. § 102.

18. The Commission does not have jurisdiction over producers of natural gas as defined by Section 102(2)(iii) of the Public Utility Code, 66 Pa.C.S. § 102(2)(iii):

(2) The term does not include: ... (iii) Any producer of natural gas not engaged in distributing such gas directly to the public for compensation.

See 66 Pa.C.S. § 102(2)(iii).

19. Here, the complaint alleges an issue with EXE transferring gas royalties to the complainant pursuant to oil and gas lease agreements and asks the Commission to issue fines and award damages for alleged emotional distress caused by delays. *See* Compl. ¶¶ 2-7.

20. However, EXE is not a public utility. *See* Tab “C” (Aff. ¶¶ 6-7).

21. EXE is a producer of natural gas. *See* Tab “C” (Aff. ¶¶ 6-7).

22. EXE is not engaged in gas distribution service or any service subject to the Commission’s jurisdiction. *See* Answer ¶ 3; Tab “C” (Aff. ¶¶ 6-7).

23. The Commission therefore lacks jurisdiction over EXE because Expand is not a public utility. *See* 66 Pa.C.S. § 102(2)(iii); *see also, e.g., Hernley Fam. Tr. v. Fayette Cnty. Zoning Hearing Bd.*, 722 A.2d 1115, 1118 (Pa. Cmwlth. 1998) (relying on Section 102(2)(iii) to hold that a producer of natural gas was not a public utility for purposes of zoning

ordinance and stating that “the Pennsylvania Public Utility Code’s definition of ‘public utility’ expressly excludes ‘any producer of natural gas, not engaged in distributing such gas directly to the public for compensation”).

24. Accordingly, the Presiding Officer should dismiss the complaint with prejudice because the Commission does not have jurisdiction over Expand.

B. The Commission lacks jurisdiction to award contract or tort damages against Expand for alleged delays in transferring gas royalty interests.

25. In addition, the Commission lacks jurisdiction over Ms. Collis’s claims and cannot grant the relief that she seeks.

26. The Commission cannot impose fines on non-jurisdictional entities. *See, e.g.*, 66 Pa.C.S. § 3301 (civil penalties limited to violations of the Code by jurisdictional entities); 52 Pa. Code § 5.21 (complaints must allege violations of statutes to obtain relief).

27. Similarly, the Commission does not have jurisdiction over claims for money damages based on breach of contract or tort. *See, e.g., Feingold v. Bell of Pa.*, 383 A.2d 791, 794 (Pa. 1977); *Johnson v. PUC*, 338 A.3d 203, 210 (Pa. Cmwlth.), *appeal granted*, 352 A.3d 453 (Pa. 2025).

28. Here, Ms. Collis asks the Commission to impose fines on Expand, *see* Compl. ¶ 7, but Ms. Collis – as the party with the burden – cites no statute or regulation or otherwise that authorizes the Commission to impose fines for delay in transferring contractual royalty interests pursuant to an oil and gas lease, let alone against a non-jurisdictional entity.

29. There is, in fact, no such statute.

30. Moreover, the Code and case law preclude the Commission from awarding contract, delay, or emotional-distress damages based on alleged failure (by EXE or anyone

else not otherwise subject to the Commission's jurisdiction) to timely transfer gas royalty interests pursuant to an oil and gas lease.

31. Accordingly, the Presiding Officer should dismiss the complaint because the Commission lacks jurisdiction over contract and tort claims, particularly against non-jurisdictional entities, and cannot impose fines upon or award damages against Expand for alleged emotional distress caused by alleged delays in transferring royalty interests to her.

C. The Commission should cancel the scheduled hearing.

32. Finally, there are several reasons to cancel the hearing scheduled in this matter for September 23, 2026.

33. First, as noted throughout, the Commission lacks jurisdiction over Expand and the claims and has no authority to grant the requested relief.

34. A hearing therefore would be unnecessary and wasteful of the time and resources of the Presiding Officer, the Commission, and the parties under the circumstances.

35. Second, as a practical matter, the transfer of complainant's royalty interests about which she originally complained already occurred some months ago, and the complainant expressly acknowledged that. *See Answer ¶ 8 & Ex. A; see also Tab "C" (Aff. ¶¶ 16-17).*

36. However, Ms. Collis informed Expand on August 12, 2026, that she intended to proceed with the claims for fines and emotional distress damages caused by Expand and another unnamed company (with which Expand is not affiliated and over which Expand has no control) for delays in transferring royalty interests to Ms. Collis. *See Answer ¶ 10 & Ex. A; see also Tab "C" (Aff. ¶¶ 15-17).*

37. These are improper reasons to maintain this complaint and hold the scheduled hearing because (a) Ms. Collis agreed that EXE completed the transfer of her royalty interests and indicated she would prefer that EXE draft something to notify the Commission, *see* Tab “C” (Aff. ¶¶ 13-14); (b) Expand has no affiliation with or control over the other unnamed companies that allegedly failed to transfer royalty interests (at least one of which has already transferred the interest as of this writing), *see* Tab “C” (Aff. ¶¶ 16); and (c) as noted above, the Commission cannot award the delay and emotional-distress damages she seeks.

38. If Ms. Collis believes she has proper contract or tort claims against a non-jurisdictional entity such as Expand, she must pursue them in a forum having appropriate jurisdiction, not here at the Commission.

39. Finally, the Presiding Officer has discretion to continue hearings for good cause shown. *See* 52 Pa. Code § 1.15.

40. Aside from the jurisdictional bar and the lack of any claims to resolve, the person within Expand who would attend the hearing on the company’s behalf is unavailable due to family medical appointments that cannot be rescheduled. *See* Tab “C” (Aff. ¶ 18-19).

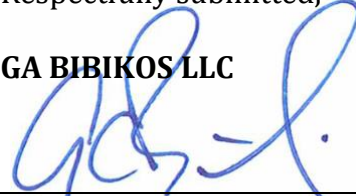
41. At a minimum, the Presiding Officer should issue an order cancelling the hearing for good cause shown pending a ruling on the motion to dismiss.

WHEREFORE, the Presiding Officer should grant the motion; dismiss the complaint with prejudice; and cancel the hearing because the Commission lacks jurisdiction over the complaint and the claims.

September 4, 2026

Respectfully submitted,

GA BIBIKOS LLC



George A. Bibikos (PA 91249)

5901 Jonestown Rd. #6330

Harrisburg, PA 17112

(717) 580-5305

gbibikos@gabibikos.com

Counsel for Expand Energy Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kelsey Collis	:	
	:	
<i>Complainant,</i>	:	
	:	
vs.	:	Docket No. C-2026-3062736
	:	
Expand Energy Corporation,	:	
	:	
<i>Respondent.</i>	:	

VERIFICATION

I, Eric Haskins, 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).

Date: 09/04/2026



Eric Haskins
Regulatory Manager – Appalachia
Expand Energy Corporation

Tab A: Complaint



PENNSYLVANIA
PUBLIC UTILITY COMMISSION

RCVD PUC SEC BUR
APR 29 2026 AM 10:59

FORMAL COMPLAINT - PRINTABLE FORM

Filing this form begins a legal proceeding and you will be a party to the case. If you do not wish to be a party to the case, consider filing an informal complaint.

1 Read and Complete this form	Required Step 2 Choose options for how to file your formal complaint and how to be contacted	3 Watch for important correspondence from the Public Utility Commission (PUC)
--	---	---

Please legibly complete this form in ink.

1. CUSTOMER (COMPLAINANT) INFORMATION

Provide your contact information and utility account number. *It is your responsibility to update the PUC with any changes to your address and to where you want documents sent to you.*

Name Kelsey Collis
Street/P.O. Box 153 Sunset Hill Rd Apt# _____
City Boyertown State PA Zip 19512
County Berks

Telephone Number(s) Where We Can Contact You During the Day:

Home: () _____ Mobile: (215) 254 4698

Email Address kelsey.collis7297@gmail.com

Utility Account Number (from your bill) _____

If your complaint involves utility service provided to a different address or in a different name than your mailing address, please list this information below.

Name Kelsey Collis
Street/P.O. Box 272 Railroad Lane Apt# _____
City Wyandling State PA Zip 19512

2. NAME OF UTILITY OR COMPANY (RESPONDENT)

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

Expand Energy

3. TYPE OF UTILITY SERVICE

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- | | |
|---|--|
| ☐ Electric | ☐ Storm Water |
| ☒ Gas | ☐ Steam Heat |
| ☐ Water | ☐ Motor Carrier (taxi, moving company, limo) |
| ☐ Wastewater/Sewer | ☐ Telephone/Telecommunications (local, long distance) |

Note: The PUC does not regulate high-speed internet service, cell phones or cable TV.

4. REASON FOR COMPLAINT

What kind of problem are you having with the utility or company?

Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. **Your complaint may be dismissed without a hearing if you do not provide specific information.**

- ☐ The utility is threatening to shut off my service or has already shut off my service.
- ☐ I would like a payment agreement.
- ☐ Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have them.
- ☐ I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.
- ☒ Other (explain) I have asked numerous times
to transfer the account into mine and
my sisters name (shelby moyer) who
are the new rightful owners of the
mineral rights since my mother passed
and we finalized the estate, and I
have received push back and no communication
for years. The company is still not up to
date on payments from gas checks.

5. REQUESTED RELIEF

How do you want your complaint to be resolved?

Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

I would like all payments to be immediately released via direct deposit into my accounts. I would also like the company to be fined for not handling the matter in a timely way, as well as pay back for emotional distress.

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

6. PROTECTION FROM ABUSE (PFA)/DOMESTIC VIOLENCE

Has a court granted you a PFA order or any other order which provides clear evidence of domestic violence against you that is currently in effect for your personal safety or welfare? The PUC needs this information to properly process your complaint so that your identity is not made public.

Has a court granted a PFA order or any other order for your personal safety or welfare?

☐ Yes If your answer is "yes," attach a copy of the current PFA order to this Formal Complaint form. Due to the confidential nature of the PFA, you cannot eFile your Formal Complaint. You will need to print out this form and mail it to the Secretary of the Commission.

☒ No

Note: You **MUST** answer this question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a problem involving billing, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

7. PRIOR UTILITY CONTACT

a. Is this an appeal from a decision of the PUC's Bureau of Consumer Services (BCS)?

☐ Yes

☒ No

Note: If you answered yes, move to Section 8. No further contact with the utility or company is required. If you answered no, answer the question in Section 7 b. and answer the question in Section 7 c. if relevant.

b. If this is not an appeal from a BCS decision, have you spoken to a utility or company representative about this complaint?

☒ Yes

☐ No

Note: You **MUST** contact the utility first if (1) you are a residential customer, (2) your complaint is against a natural gas distribution utility, an electric distribution utility or a water utility AND (3) your complaint is about a billing problem, a service problem, a termination of service problem, or a request for a payment agreement.

c. If you tried to speak to a utility company representative about your complaint but were not able to do so, please explain why.

I've been pushed from department to
department and never been resolved
of anything.

Note: Even if you are not required to contact the utility or company, you should always try to speak to a utility or company representative about your problem before you file a Formal Complaint with the PUC.

8. TWO OPTIONS TO FILE YOUR FORMAL COMPLAINT — CHOOSE ONE

OPTION 1

Electronically by eFile

One option is to create an account on the PUC's eFiling system, or, use your existing eFiling account. This is the quickest and easiest way to receive, file and submit documents.

eFiling permits consumers, utilities and attorneys to file certain documents electronically with the PUC without filing paper copies, serve documents electronically on other parties if they agree to such service, and to receive electronic service of documents from the PUC.

You agree to open and use an eFiling account - free of charge through the PUC's website. By selecting this method, you will electronically receive documents.

Visit <https://efiling.puc.pa.gov/> to learn more and create an eFiling account.

You will automatically receive eService with your eFiling account.

OPTION 2

Mail

Mail the completed form with your original signature and any attachments to this address and retain the tracking information as proof of submission:

**Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17120**

If you select the option to mail your formal complaint, you are required to select the method by which you would like the PUC to communicate with you. You must choose one of the three options on the next page for ways you would like to receive documents.

9. THREE OPTIONS TO RECEIVE DOCUMENTS — CHOOSE ONE

It is **REQUIRED** to select **ONE** of the following options for receiving all hearing notices, orders and related documents from the PUC:

OPTION 1

eFILING: This is the quickest and easiest way to receive all documents. You agree to open and use an eFiling account - free of charge through the PUC's website. By selecting this method you will electronically receive documents. To create an eFiling account, visit <https://efiling.puc.pa.gov/>.

☐

You will automatically receive eService with your eFiling account.

OPTION 2

FIRST CLASS MAIL: You agree to receive all documents by First Class Mail (using the address you provided on Page 1).

☐

Check the box and initial here _____ if you are selecting **FIRST CLASS MAIL** service.

OPTION 3

EMAIL: You agree to receive all documents by email (using the email address you provided on page 1). Keep in mind, you will only be able to receive documents by email from the PUC. You will not be able to email documents to the Commission.

To file documents, you must submit them through an eFiling account or mail them. To create an eFiling account, visit <https://efiling.puc.pa.gov/>.

☒

Check the box and initial here LC if you are selecting **EMAIL** service.

Please Note: It is important to select **ONE** of the three options above.

IF AN OPTION IS NOT SELECTED, THIS MAY DELAY THE PROCESSING OF YOUR COMPLAINT.

RCVD PUC SEC BUR
APR 29 2025 AM 11:00

10. LEGAL REPRESENTATION

If you are filing a Formal Complaint as an individual on your own behalf, you are NOT required to have a lawyer. You may represent yourself at the hearing.

If you are already represented by a lawyer in this matter, provide your lawyer's contact information, which is required. Please make sure your lawyer is aware of your complaint. If represented by a lawyer, both you and your lawyer must be present at your hearing.

Lawyer's Name _____
Street/P.O. Box _____ Apt# _____
City _____ State _____ Zip _____
Area Code/Phone Number _____
Email Address _____

Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.

11. VERIFICATION AND SIGNATURE

You **MUST** sign and date your complaint. If you file by mail, you must sign your name in ink on the line provided below. Date the form. If you do not sign with your original signature and date, the PUC will not accept your complaint.

Verification:

RCVD PUC SEC BUR
APR 29 2026 AM 11:00

I Keisen Collins, hereby state that the facts above set forth are true and correct (or 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 of Complainant)

4/15/26
(Date)

Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification must be signed by an authorized officer or authorized employee. If the Formal Complaint is not signed by one of these individuals, the PUC will not accept it.

APPEALING A BCS DECISION?

If you are appealing a BCS decision: follow the directions in the cover letter you received from the PUC Secretary's Bureau with the formal complaint form. **ONLY** formal complaints appealing a BCS decision can be filed by fax, email or overnight delivery to meet filing deadlines. All other formal complaints **MUST** be eFiled or mailed.

QUESTIONS?

If you have any questions about filling out this form, please contact the Secretary's Bureau at **717-772-7777**.

REMINDERS

- Keep a copy of your Formal Complaint for your records.
- If you are electronically filing your Formal Complaint through eFiling, you will need to scan the document and save it as a PDF.
- You may add any additional information, such as copies of bills, as one (1) separate attachment to your complaint.
- To protect your personal information, please know that your complaint form and the utility's answer will not be published to the PUC's website.
- Check the Consumer Complaints Procedures Guide for checklists and tips to help you successfully follow the complaint-filing process.
(<https://www.puc.pa.gov/media/1492/consumer-complaints-procedures-guide-2021.pdf>)
- Once your complaint case moves to the PUC's Office of Administrative Law Judge, any filings you make should be marked confidential if you do not want them published to the website.

Kelsey Collins
153 Sunset Hill Rd
Bayertown, PA 19512

HARRISBURG PA 171

25 APR 2026 PM 3 L



Secretary
Pennsylvania Public Utility Commission
400 North Street 2nd floor
Harrisburg, PA 17120

17120-021193



Tab B: Answer to Formal Complaint with Exhibits A (Collis Emails); B (Emails with Complainant and Presiding Officer); and C (Notice of Limited Appearance)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kelsey Collis	:	
	:	
<i>Complainant,</i>	:	
	:	
vs.	:	Docket No. C-2026-3062736
	:	
Expand Energy Corporation,	:	
	:	
<i>Respondent.</i>	:	

ANSWER

Pursuant to 52 Pa. Code § 5.21, Expand Energy Corporation (“Expand” or “EXE”) answers *nunc pro tunc* the formal complaint filed by Ms. Kelsey Collis (complainant or “Ms. Collis”) as follows. BY FILING THIS ANSWER, EXE IS NOT CONSENTING TO THE COMMISSION’S JURISDICTION. Expand is appearing to contest jurisdiction and have the complaint dismissed with prejudice.

Response to Allegations

1. EXE denies the allegations in the complaint that Expand is a public utility; that it provides gas service; that it failed to transfer royalty interests in a timely fashion; that it failed to communicate with complainant for years; that it is not up to date on payments from gas checks; and that alleged delays caused harm or emotional distress. To the contrary, EXE is not a public utility; does not provide gas services to complainant or anyone; and in any event completed the transfer of royalty interests as complainant expressly acknowledged. **See Ex. “A” (emails with Ms. Collis).** EXPAND DENIES ANY AND ALL OTHER ALLEGATIONS IN THE COMPLAINT.

New Matter

2. Expand is a producer of natural gas.

3. Expand does not provide gas distribution service or other service to the public or otherwise.

4. Expand is not a public utility.

5. Expand and complainant (as heir to her mother's estate) are parties to an oil and gas lease.

6. Ms. Collis requested that Expand transfer royalties to her as heir/successor in interest following probate of her mother's estate. *See* Compl. ¶¶ 4-5.

7. At Ms. Collis's request, and prior to her filing the complaint, Expand transferred royalty interests to her on or about February 2026. *See* **Ex. "A."**

8. Ms. Collis acknowledged that the transfer is complete. *See* **Ex. "A."**

9. Ms. Collis requested EXE's assistance in or about May 2026 to notify the Commission in writing that her complaint was resolved, which EXE provided. *See* **Ex. "A."**

10. However, Ms. Collis informed Expand on August 12, 2026, that she intended to proceed with the claims for fines and emotional distress damages caused by Expand and two other unnamed companies (with which Expand is not affiliated and over which Expand has no control) for delays in transferring royalty interests to Ms. Collis. (On information and belief, at least one of the other unnamed companies also has transferred interests as of this filing. *See* **Ex. "B" (emails with complainant and Presiding Officer)**).

11. Upon learning of her intent to proceed, EXE engaged counsel; immediately informed the Presiding Officer and Ms. Collis of the circumstances via emails in an attempt to resolve the matter (including informing them of the jurisdictional and other barriers to the complaint); *see* **Ex. "B"**; EXE formally appeared through counsel for the limited purpose of contesting jurisdiction; *see* **Ex. "C" (Notice of Limited Appearance)**; and EXE filed this

answer contemporaneously with a motion to dismiss for lack of jurisdiction and a corresponding request to cancel the hearing scheduled for September 23, 2026.

Affirmative Defenses

12. The Commission lacks jurisdiction over Expand and the claims in the complaint.

13. Ms. Collis has failed to state a claim for which the Commission can grant relief.

14. Some or all of the claims are barred, in whole or in part, by applicable statutes of limitations and/or laches.

15. Some or all of the claims are barred, in whole or in part, by principles of consent, accord and satisfaction, ratification, waiver, and/or estoppel.

16. Some or all of the claims are barred, in whole or in part, by principles of setoff or recoupment.

17. Ms. Collis has failed to satisfy conditions precedent before commencing an action.

18. Expand reserves its right to amend.

Nunc Pro Tunc

19. Expand files its answer *nunc pro tunc* for purposes of the record and to close the pleadings so that it may file a dispositive motion to dismiss for lack of jurisdiction.

20. Expand completed the transfer of Ms. Collis's royalty interests in February 2026, prior to her filing the complaint.

21. When Expand contacted Ms. Collis upon receiving the complaint, she agreed that the transfer had been completed, and the parties discussed notifying the Commission

that the complaint was resolved and Ms. Collis indicated she would prefer that EXE draft something for her to notify the Commission. *See Ex. “A.”*

22. Expand helped her draft an email to the Presiding Officer to withdraw the complaint. *See Ex. “A.”*

23. Despite Ms. Collis’s earlier representations that she agreed to notify the Commission that EXE resolved her claims, she advised Expand on August 12, 2026, that she wishes to move forward based on the fact that two other companies (with or over which Expand has neither affiliation nor control) have not transferred royalty interests to her. *See Ex. “A.”*

24. Until August 12, 2026, Expand believed the case had been resolved without the need for further action, including responding to the complaint.

25. As noted, upon learning that Ms. Collis intended to proceed, EXE immediately engaged counsel; immediately informed the Presiding Officer and Ms. Collis of the circumstances via emails in an attempt to resolve the matter (including informing them of the jurisdictional barrier to the complaint); *see Ex. “B”*; formally appeared through counsel for the limited purpose of contesting jurisdiction; *see Ex. “C”*; and filed this answer contemporaneously with a motion to dismiss for lack of jurisdiction and a corresponding request to cancel the hearing scheduled for September 23, 2026.

26. The *nunc pro tunc* filing does not prejudice the parties or the Commission because the Commission lacks jurisdiction over both Expand and Ms. Collis’s claims, and the scheduled hearing that Expand seeks to cancel would waste the time and resources of the Presiding Officer, the Commission, and the parties if it proceeds.

27. Moreover, Ms. Collis's representations caused EXE to reasonably believe that there would be no reason to file an unnecessary response to a complaint that the parties resolved (and over which the Commission has no jurisdiction anyway).

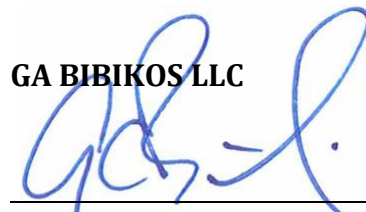
28. Under the circumstances, *nunc pro tunc* relief is appropriate. *See, e.g., Knox Township v. Buffalo & Pittsburgh Railroad, Inc.*, Docket No. C-2019-3009358 (Order entered April 20, 2023).

WHEREFORE, Expand requests that the Commission dismiss the case with prejudice and order such other and further relief as the Commission deems just and reasonable.

September 4, 2026

Respectfully submitted,

GA BIBIKOS LLC



George A. Bibikos (PA 91249)
5901 Jonestown Rd. #6330
Harrisburg, PA 17112
(717) 580-5305
gbibikos@gabibikos.com

Counsel for Expand Energy Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kelsey Collis

Complainant,

vs.

Expand Energy Corporation,

Respondent.

:
:
:
:
:
:
:
:
:
:

Docket No. C-2026-3062736

VERIFICATION

I, Eric Haskins, 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).

Date: 09/04/2026



Eric Haskins
Regulatory Manager – Appalachia
Expand Energy Corporation

EXHIBIT A – Collis Emails

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

Exhibit B – Emails with Complainant and Presiding Officer

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
(717) 580-5305 | gbibikos@gabibikos.com
[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

From: George A. Bibikos gbibikos@gabibikos.com 
Subject: Re: Kelsey Collis v. Expand Energy Corporation, Docket No. C-2026-3062736
Date: August 27, 2026 at 9:53 AM
To: evero@pa.gov
Cc: kelseycollis7297@gmail.com
Bcc: George A. Bibikos gbibikos@gabibikos.com



**(e-file) Expand - Collis -
Bibikos Appearance (Limited)...**
685 KB



Dear Judge Vero and Ms. Collis:

I've attached a notice of limited appearance filed on behalf of Expand Energy Corporation this morning. Service via this email only.

As noted in the notice of limited appearance and in my email from August 14, 2026, the Commission does not have jurisdiction over Expand in this consumer complaint case because Expand is not a public utility and the claims are otherwise not within the Commission's jurisdiction to resolve. (In addition, the basis for the complaint - transferring gas royalty interests to Ms. Collis - has been resolved by the parties.)

Given that, I ask for Your Honor's guidance.

I would like to request a status conference with Your Honor and Ms. Collis in the short term if at all possible as I understand that there is a hearing scheduled for September 23, 2026, that should be cancelled given the jurisdictional issue.

Expand would prefer that Ms. Collis withdraw her complaint to avoid the time and expense of motions practice, but if Your Honor prefers that, please let me know, and Expand will plan to move for a continuance of the hearing and file a dispositive motion.

Thank you for your consideration of this message. Please reply to confirm receipt.

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

GA BIBIKOS LLC
relentless. advocacy. period.

George A. Bibikos | Managing Member
5901 Jonestown Rd. #6330 | Harrisburg, PA 17112
(717) 580-5305 | gbibikos@gabibikos.com
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On Aug 21, 2026, at 2:24PM, George A. Bibikos <gbibikos@gabibikos.com> wrote:

Your Honor and Ms. Collis:

I am following up to confirm receipt of my message from last Friday. Thank you. Enjoy your weekends.

George

<1CRA6RC9-F798-4181-8F98-546431RR1C19.nnd>

https://www.puc.pa.gov/external/copy.php

George A. Bibikos | Managing Member
5901 Jonestown Rd. #6330 | Harrisburg, PA 17112
(717) 580-5305 | gbibikos@gabibikos.com
[Web](#) | [X](#) | [LinkedIn](#) | [At the Well Weekly](#)

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

Begin forwarded message:

From: "George A. Bibikos" <gbibikos@gabibikos.com>
Subject: Kelsey Collis v. Expand Energy Corporation, Docket No. C-2026-3062736
Date: August 14, 2026 at 8:44:50 AM EDT
To: evero@pa.gov
Cc: kelseycollis7297@gmail.com

<FW EXTERNAL Re Expand Energy copy.pdf>

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.

Very truly yours,

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

<1CBA6BC9-F798-4181-8E98-546431BB1C19.png>

George A. Bibikos | Managing Member
5901 Jonestown Rd. #6330 | Harrisburg, PA 17112
(717) 580-5305 | gbibikos@gabibikos.com
[Web](#) | [X](#) | [LinkedIn](#) | [At the Well Weekly](#)

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

From: George A. Bibikos gbibikos@gabibikos.com 
Subject: Kelsey Collis v. Expand Energy Corporation, Docket No. C-2026-3062736
Date: September 1, 2026 at 2:47 PM
To: pmcneal@pa.gov
Bcc: George A. Bibikos gbibikos@gabibikos.com



**(e-file) Expand - Collis -
Bibikos Appearance (Limited)...**
685 KB



**Kelsey Collis v. Expand Energy
Corporation, Docket No. C-...**
121 KB



**Re: Kelsey Collis v. Expand
Energy Corporation, Docket ...**
961 KB



Dear Ms. McLean:

George Bibikos here. I'm forwarding emails and documents that I sent and/or served on ALJ Vero over the past week regarding the above-captioned consumer complaint filed against my non-utility client. I have not had any response from Judge Vero or the complainant, so I got concerned my emails have not been going through. I reached out to the OALJ's office in Philly and the helpful person there suggested I re-forward the emails and documents to you. As you'll see in the communications to Judge Vero, the complainant, and the Commission, I'm attempting to resolve this case informally with the complainant and the ALJ given lack of Commission jurisdiction over my client and the complainant's claims. There's a hearing scheduled for September 23.

I'm prepared to file this week a motion to dismiss on jurisdictional grounds and to cancel the hearing pending a ruling, but I wanted to try one last time to see if Judge Vero is willing to schedule a conference to see if we can sort it out with the complainant without having to go through motions practice or a hearing that in the end will be unnecessary and wasteful.

Thanks for your time. I'd be grateful for a quick reply to this email just to confirm you received it.

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

GA BIBIKOS LLC
relentless. advocacy. period.

George A. Bibikos | Managing Member
5901 Jonestown Rd. #6330 | Harrisburg, PA 17112
(717) 580-5305 | gbibikos@gabibikos.com
[Web](#) | [X](#) | [LinkedIn](#) | [At the Well Weekly](#)

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

Exhibit C – Notice of Limited Appearance & Exhibits

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

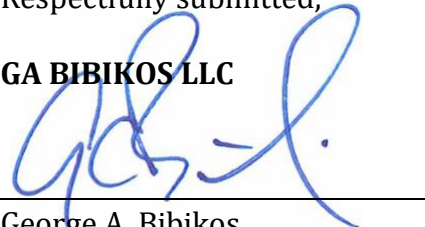
NOTICE OF LIMITED APPEARANCE

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:

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Very truly yours,

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



George A. Bibikos | Managing Member
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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

Tab C - Affidavit

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kelsey Collis	:	
	:	
<i>Complainant,</i>	:	
	:	
vs.	:	Docket No. C-2026-3062736
	:	
Expand Energy Corporation,	:	
	:	
<i>Respondent.</i>	:	

AFFIDAVIT

I, Eric Haskins, declare as follows.

1. I am the Senior Manager – Regulatory for Appalachia for Expand Energy Corporation (which I refer to as “EXE” or “Expand” in this affidavit).
2. I am over the age of 18 and have personal knowledge of the following facts.
3. I am authorized to make these statements on behalf of Expand.
4. I have reviewed the complaint, answer, and documents attached to both.
5. Expand is the country’s largest producer of natural gas.
6. Expand is engaged in the production of natural gas in Pennsylvania.
7. Expand is not engaged in local gas distribution service to or for the public for compensation or otherwise engaged in any public utility services.
8. Expand is not certificated to provide public utility service in Pennsylvania.
9. Expand and complainant (as heir to her mother’s estate) are parties to an oil and gas lease.
10. Ms. Collis requested that Expand transfer royalties to her as heir/successor in interest following probate of her mother’s estate.

11. Ms. Collis filed a formal complaint with the Commission in April 2026 requesting transfer or royalty interests, fines, and emotional-distress damages.

12. Pursuant to her prior request, Expand already had transferred royalty interests to Ms. Collis in or about February 2026.

13. Ms. Collis expressly acknowledged that Expand's transfer of her royalty interest is complete.

14. Ms. Collis requested EXE's assistance drafting something to notify the commission that her complaint was resolved in or about May 2026, which EXE provided.

15. However, Ms. Collis informed Expand on August 12, 2026, that she intended to proceed with the claims for fines and emotional distress damages caused by Expand and other companies for alleged delays in transferring gas royalty interests to her.

16. Expand is neither affiliated with nor has any control over the other companies to which Ms. Collis referred.

17. My understanding is that, in any event, at least one of the companies that Ms. Collis identified also already has transferred her royalty interests.

18. I understand there's a scheduled hearing on September 23, 2026.

19. As the person who most likely would attend any hearing scheduled in this matter on EXE's behalf in the event the case is not dismissed, I am unavailable on September 23, 2026, due to pre-existing family medical appointments that I am unable to reschedule.

* * *

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 09/04/2026


Eric Haskins
Regulatory Manager – Appalachia
Expand Energy Corporation