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April 21, 2025

VIA ELECTRONIC FILING

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

RE: Petition for Generic Investigation or Rulemaking Regarding "Gas-on-Gas" Competition Between Jurisdictional Natural Gas Distribution Companies

Generic Investigation Regarding Gas-on-Gas Competition Between Jurisdictional Natural Gas Distribution Companies

Docket Nos. P-2011-2277868 and I-2012-2320323

Dear Secretary Homsher:

Enclosed for filing in the referenced matter please find Columbia Gas of Pennsylvania, Inc.'s Prehearing Memorandum.

If you have any questions regarding this filing, please do not hesitate to call me at 724-809-0525.

Very truly yours,

A handwritten signature in blue ink that reads "Theodore J. Gallagher".

Theodore J. Gallagher

enclosure

cc Certificate of Service
Administrative Law Judge Katrina L. Dunderdale (via email – kdunderdal@pa.gov)
Mary Swarner, Legal Assistant (via email – mswarner@pa.gov)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition for Generic Investigation or Rulemaking	:	
Regarding “Gas-on-Gas” Competition Between	:	
Jurisdictional Natural Gas Distribution Companies	:	Docket Nos. P-2011-2277868
Generic Investigation Regarding Gas-on-Gas	:	I-2012-2320323
Competition Between Jurisdictional Natural Gas	:	
Distribution Companies	:	

**PREHEARING MEMORANDUM OF
COLUMBIA GAS OF PENNSYLVANIA, INC.**

TO: ADMINISTRATIVE LAW KATRINA L. DUNDERDALE:

Pursuant to 52 Pa. Code § 5.222(d), Columbia Gas of Pennsylvania, Inc. (“Columbia” or “Company”) hereby submits this Prehearing Conference Memorandum in advance of the prehearing conference scheduled for April 22, 2025.

I. HISTORY OF THIS PROCEEDING

On December 8, 2011, Peoples Natural Gas Company (“Peoples”), the Bureau of Investigation and Enforcement (“BI&E”), the Office of Consumer Advocate (“OCA”), and the Office of Small Business Advocate (“OSBA”) jointly filed a Petition for Generic Investigation or Rulemaking Regarding “Gas on Gas Competition” Between Jurisdictional Natural Gas Distribution Companies (“Joint Petition”). The Joint Petition was filed pursuant to an approved settlement of Peoples’ base rate proceeding at Docket No. R-2010-2201702, whereby Peoples, BI&E, OCA, and OSBA agreed to address “gas-on-gas competition” issues by requesting that the Public Utility Commission (“Commission”) review the effect of distribution rate competition among Natural Gas Distribution Companies (“NGDCs”) on a generic basis for all NGDCs.

The approved partial settlement of Columbia’s base rate proceeding at Docket No. R-2010-2215623 also addressed the issue of gas-on-gas competition and included a similar provision to

the Peoples rate case settlement. Specifically, the Columbia partial settlement provided, in relevant part:

Columbia agrees to join with [BI&E], OCA and/or OSBA in a request that the Commission initiate a generic investigation or rulemaking to address whether flex discounts solely as a result of competition from other NGDCs should be permitted to continue and, if permitted to continue, under what circumstances it will be considered appropriate.

Accordingly, on March 19, 2012, Columbia filed a petition to intervene in the Joint Petition.

On May 4, 2017, the Commission entered an Opinion and Order that permitted gas-on-gas competition to continue under specific conditions and solicited comments and reply comments regarding the execution of uniform tariff provisions that should be utilized to implement gas-on-gas flex rates on a going forward basis.

The remaining procedural history of this matter is accurately summarized in the Secretarial Letter issued on March 28, 2025.

II. SERVICE OF DOCUMENTS

Columbia's attorneys in this proceeding are:

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Columbia requests that Mr. Gallagher be listed as the recipient for service. Columbia also requests that Ms. Tunilo be added to any e-mail distribution lists in this proceeding. Columbia agrees to receive service of documents electronically.

III. ISSUES/PROCEDURE

Columbia has reviewed the procedural recommendation that OCA has included in its

Prehearing Memorandum served today and is amenable to that recommendation.

IV. WITNESSES

Should further testimony be needed in this case, Columbia anticipates that it will introduce the testimony of David Bokash who will testify regarding the Company's flex rate contracts and its position regarding issues in this matter including, but not limited to, the open issues listed in the Commission's Order issued on June 13, 2019. Columbia reserves the right to call additional witnesses, as necessary, to address issues that may arise during the course of this proceeding.

V. PROPOSED SCHEDULE

Consistent with the proposal in OCA's Prehearing Memorandum, Columbia agrees that the procedural schedule should align with OCA's proposed procedure in this case.

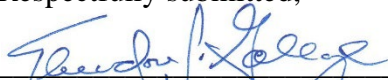
VI. DISCOVERY

Columbia does not propose any modifications to established regulations regarding service and timing of discovery.

VII. SETTLEMENT

Columbia remains open to settlement negotiations in this matter.

Respectfully submitted,



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Date: April 21, 2025

*Attorney for Columbia Gas of
Pennsylvania, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing 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).

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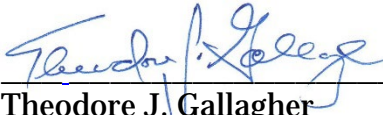
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Date: April 21, 2025



Theodore J. Gallagher