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March 27, 2015

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania;
Docket No. R-2015-2469665; **PETITION TO INTERVENE OF SHIPLEY
ENERGY COMPANY, INTERSTATE GAS SUPPLY, INC AND
DOMINION RETAIL, INC.**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of Shipley Energy Company, Interstate Gas Supply, Inc., and Dominion Retail, Inc. in the above-captioned docket. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart
*Counsel for Shipley Choice, LLC Interstate
Gas Supply, Inc. and Dominion Retail, Inc.*

TSS/jld
Enclosure
cc: Per Certificate of Service

CERTIFICATE OF SERVICE

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

VIA ELECTRONIC AND FIRST CLASS MAIL

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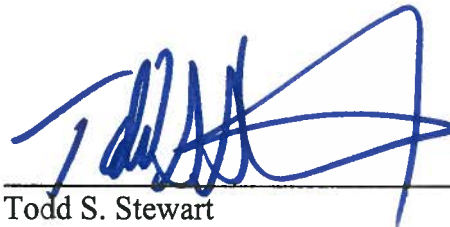
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Todd S. Stewart

DATED: March 27, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,
et al.,

v.

Columbia Gas of Pennsylvania, Inc.

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Docket No.: R-2015-2469665

**PETITION TO INTERVENE
OF SHIPLEY ENERGY COMPANY,
INTERSTATE GAS SUPPLY, INC. AND
DOMINION RETAIL, INC.**

NOW COMES Shipley Choice, LLC d/b/a Shipley Energy Company (“Shipley”), Interstate Gas Supply, Inc. d/b/a IGS Energy (“IGS”) and Dominion Retail, Inc. d/b/a Dominion Energy Solutions (“DES”)(collectively “NGS Parties”), and hereby petition the Pennsylvania Public Utility Commission (“Commission”) to intervene in the above-captioned annual filing made pursuant to 66 Pa. Code §1307(f). As discussed more fully below, the NGS Parties all are licensed natural gas suppliers (“NGS”) providing natural gas supply service using the jurisdictional facilities of Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”). In support of their Petition to Intervene, the NGS Parties state and aver as follows:

1. On or about February 27, 2015, Columbia submitted its pre-filing information in anticipation of its annual 1307(f) proceeding with the Commission, as required. On or before April 1, 2015, Columbia is expected to submit its annual filing under the same section.

2. The NGS parties are represented in the above-captioned matter by the following counsel:

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3. The NGS Parties currently serve customers across all customer classes on the Columbia system, including residential, small and large commercial and industrial customers. As such, the NGS Parties have a direct and immediate interest in the manner in which natural gas costs, capacity costs and all other costs related to natural gas supply are reconciled and priced on the Columbia system as these form the basis of the priced-to-compare against which they compete. The NGS Parties also have a direct interest in the outcome of any proceeding involving Columbia's tariff, which reflects any such charges, as such changes are likely to have a direct impact on their ability to compete and serve customers on the Columbia system.

4. In its Order resolving Columbia's 2014 1307(f) case,¹ the Commission required that Columbia include specific information with regard to the sharing mechanism and other information about Columbia's off system sales revenue and the sources thereof. Specifically, the Commission required Columbia to include information responsive to the following questions in this year's filing:

- Are transportation and storage assets equally allocated between CHOICE and PGC customers, taking into account base-load assignment of firm transportation given to, and paid for by NGSs? If not, describe and specifically quantify any differential.

¹ *Pennsylvania Public Utility Commission, et al v. Columbia Gas of Pennsylvania, Inc.*, Docket No. R-2014-2408268 (Opinion and Order entered September 18, 2014)

- Do both NGSs and PGC customers pay a roughly equal load-weighted share of total system storage and transportation costs, taking into account NGS-assigned capacity and balancing service costs? If not, specifically quantify this differential.
- Can Columbia definitely identify any off-system sales that do not involve the use of its transportation and storage assets? If so, describe and specifically quantify each of these transactions.
- Under Columbia's AMAs, are the underlying released transportation and storage assets paid for by CHOICE and PGC customers in proportion to their load? If not, describe and specifically quantify any differential.
- Under Columbia's released capacity transactions, are the released transportation and storage assets paid for by CHOICE and PGC customers in proportion to their load? If not, describe and specifically quantify any differential.
- Under Columbia's off-system sales transactions, are the underlying transportation and storage assets paid for by CHOICE and PGC customers in proportion to their load? If not, describe and specifically quantify any differential.²

The NGS Parties intend to fully pursue the manner in which those off system sales revenues are shared, as between shopping and non-shopping customers, based upon the information provided by Columbia in its filing. While the NGS Parties currently are reviewing other portions of Columbia's 1307(f) filing, they have not yet taken any firm positions on other issues, but will be prepared and more fully state their positions and will notify Presiding Administrative Law Judge and Parties of such intention in the immediate future.

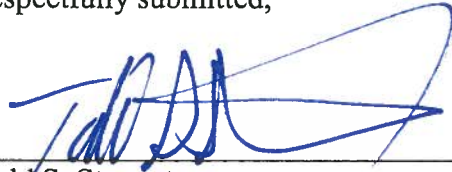
5. Because they serve customers on the Columbia system and have a direct and immediate interest in the outcome of the determination of the appropriate cost for natural gas supply and related services, the NGS Parties' intervention satisfies the requirements of 52 Pa. Code § 5.71, *et seq.*, in that their interest is immediate and substantial, it cannot be represented by any other party, and the NGS Parties clearly will be bound by any decision of the Commission with regard to Columbia's 1307(f) filing. Accordingly, the NGS Parties request

² *Pennsylvania Public Utility Commission, et al v. Columbia Gas of Pennsylvania, Inc.*, Docket No. R-2014-2408268 (Opinion and Order entered September 18, 2014, pp. 32-33)

that their intervention be granted and that they be granted full party status in the above-captioned matter.

WHEREFORE, the NGS Parties hereby petition the Pennsylvania Public Utility Commission to intervene in the above-captioned matter as full parties.

Respectfully submitted,



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DATED: March 27, 2015