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April 15, 2015

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania;
Docket Nos. R-2015-2468056 and C-2015-2473682; **PREHEARING
CONFERENCE MEMORANDUM OF THE PENNSYLVANIA STATE
UNIVERSITY**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission the Prehearing Conference Memorandum of The Pennsylvania State University in the above-referenced docket. Copies have been served in accordance with the attached Certificate of Service.

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

Very truly yours,

Thomas J. Sniscak
William E. Lehman

*Counsel for
The Pennsylvania State University*

TJS/das

Enclosures

cc: Hon. Mary D. Long
Per Certificate of Service

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

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 the manner indicated below, and in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Via Electronic and First Class U.S. Mail

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Certificate of Service
Page 2

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Thomas J. Sniscak
William E. Lehman

Dated: April 15, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2015-2468056
	:	C-2015-2473682
Columbia Gas of Pennsylvania, Inc.	:	

**PREHEARING CONFERENCE MEMORANDUM
OF THE PENNSYLVANIA STATE UNIVERSITY**

TO: THE HONORABLE MARY D. LONG:

On April 10, 2015, an Order was issued by the Pennsylvania Public Utility Commission (“Commission”) setting a Telephonic Prehearing Conference in the above-captioned proceeding for Thursday, April 16, 2015 at 10:00 a.m. before the Honorable Mary D. Long. On April 9, 2015, Administrative Law Judge (“ALJ”) Mary D. Long issued a Prehearing Conference Order requiring each party to file a Prehearing Conference Memorandum by April 15, 2015.

The Pennsylvania State University (“PSU”), by and through its attorneys in this matter, Hawke McKeon & Sniscak LLP, hereby submits its Prehearing Conference Memorandum.

I. ACCEPTANCE OF SERVICE

Service of paper documents in this proceeding shall be accepted on behalf of PSU by:

Thomas J. Sniscak, Esquire
William E. Lehman, Esquire
Hawke McKeon & Sniscak LLP
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Counsel for PSU also requests that any electronic service list utilized by the parties in this proceeding include Thomas J. Sniscak (tjsniscak@hmslegal.com) and William E. Lehman (welehman@hmslegal.com). PSU is willing to extend the same courtesy upon request of any other party for any e-mails or electronic service to the parties.

II. SETTLEMENT

There have been no settlement discussions to date, but PSU is willing to participate in settlement discussions with the other parties.

III. DISCOVERY

PSU takes no position on modification of the discovery schedule at this time but is willing to work with the parties on mutually agreeable modifications.

IV. SCHEDULE

PSU is working with the other parties to develop a mutually satisfactory schedule for consideration by Your Honor at the Prehearing Conference.

V. WITNESSES

PSU reserves the right to offer the Direct Testimony of James L. Crist in support of its positions. Mr. Crist's business address, telephone number and e-mail address are:

James L. Crist
Lumen Group, Inc.
4226 Yarmouth Drive, Suite 101
Allison Park, PA 15101
(412) 487-9708
JLCrist@aol.com

PSU requests that copies of all interrogatories, answers to interrogatories, testimony and exhibits submitted (other than Columbia's initial filing materials) be e-mailed directly to Mr. Crist at JLCrist@aol.com.

If called, Mr. Crist may present testimony regarding the revenue required by the Company and the allocation of that revenue to the various tariffs, along with the rate design and operational requirements of specific rate schedules and also may present testimony in response to testimony or exhibits offered by any other party. Mr. Crist may also present testimony regarding Rider CAC, "Choice Administration Charge," which is an additional fee that applies to all customers receiving gas supplies from an alternative provider and the Company's proposed Gas Procurement Charge. Mr. Crist reserves his right to also present testimony on any further issue that may arise as a result of further review of the filing, discovery or testimony or any position taken by any other party to this proceeding.

Additionally, PSU may offer the direct testimony of a member of its Office of Physical Plant - Energy and Engineering Division regarding rate issues created or raised by the filing and its offered supporting information. PSU reserves the right to present additional witnesses should its discovery or its review of responses to the discovery of other parties raise additional issues.

PSU reserves the right to adopt any testimony of other witnesses, in whole or in part, and to offer additional witnesses and exhibits as may be necessary to address the testimony, exhibits, or evidence that may be presented by any party in this proceeding.

VI. ISSUES

At this juncture, and subject to discovery and issues raised by PSU and by other parties, PSU intends to address the issue of whether the service PSU takes under certain rate categories may be burdened with a disproportionate share of the overall increase requested. The Company's cost allocations and multiple Cost of Service Studies appear to be unreasonable and discriminatory as is the proposed distribution of its recommended revenue requirement.

In addition, contrary to Commission policy to encourage competition and develop a healthy alternative gas supply market, the Company has again introduced Rider CAC, "Choice Administration Charge," an additional fee that applies to all customers receiving gas supplies from an alternative provider and places Columbia's own system supply gas in a more favorable position. Furthermore, the Company's proposed Gas Procurement Charge is notably lower than other Pennsylvania natural gas distribution companies and also serves to place Columbia's own system supply gas in a more favorable position.

PSU's position will be finalized in its evidence and briefs submitted under the schedule developed in this case.

VII. EVIDENCE

PSU reserves the right to submit pre-filed direct testimony and associated exhibits addressing the issues identified in the preceding section. PSU may also present additional testimony and exhibits after discovery or in response to testimony or exhibits introduced by any party or witness in this proceeding.

WHEREFORE, The Pennsylvania State University respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,



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*Counsel for
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Dated: April 15, 2015