

Todd S. Stewart

Office: 717 236-1300 x242

Direct: 717 703-0806 tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

April 6, 2016

## **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, Inc.: Docket No. R-2016-2529660; PETITION TO INTERVENE OF SHIPLEY CHOICE, LLC, AMERIGREEN ENERGY, INTERSTATE GAS SUPPLY, INC AND DOMINION RETAIL, INC.

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of Shipley Choice, LLC, AMERIGreen Energy, Interstate Gas Supply, Inc., and Dominion Retail, Inc. in the abovecaptioned 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 d/b/a Shipley Energy, AMERIGreen Energy, Interstate Gas Supply, Inc. d/b/a IGS Energy and Dominion Retail, Inc. d/b/a Dominion Energy Solutions ("NGS Parties")

TSS/jld Enclosure

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

Carrie B. Wright, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, PO Box 3265
Harrisburg, PA 17105-3265
carwright@pa.gov

Erin L. Gannon, Esquire
Lauren Burge, Esquire
Amy Hirakis, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923
Egannon@paoca.org
lgurge@paoca.org
ahirakis@paoca.org

Michael W. Hassell, Esquire
Lindsay A. Berkstresser, Esquire
Lillian S. Harris, Esquire
Post & Schell, P.C.
17 North Second Street, 12<sup>th</sup> Fl.
Harrisburg, PA 17101
mhassell@postschell.com
lberkstresser@postschell.com
lharris@postschell.com
Counsel for Columbia Gas of Pennsylvania, Inc.

Daniel G. Asmus Small Business Advocate Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101 dasmus@pa.gov

Theodore J. Gallagher, Esquire
Meagan Bielanin Moore, Esquire
Columbia Gas of Pennsylvania, Inc.
121 Champion Way, Suite 100
Canonsburg, PA 15317
tigallagher@nisource.com
mbielanin@nisource.com
Counsel for Columbia Gas of Pennsylvania, Inc.

Andrew S. Tubbs, Esquire
NiSource Corporate Services Company
800 N. Third Street, Suite 204
Harrisburg, PA 17102
astubbs@nisource.com
Counsel for Columbia Gas of Pennsylvania, Inc.

Charis Mincavage, Esquire
Alessandra L. Hylander, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
cmincavage@mwn.com
ahylander@mwn.com
Counsel for CII

Todd S. Stewart

DATED: April 6, 2016

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission,

Docket Nos.: R-2016-2529660

Columbia Gas of Pennsylvania, Inc.

V.

PETITION TO INTERVENE
OF SHIPLEY CHOICE LLC, AMERIGREEN ENERGY,
INTERSTATE GAS SUPPLY, INC. AND
DOMINION RETAIL, INC.

NOW COMES Shipley Choice, LLC d/b/a Shipley Energy ("Shipley"), AMERIGreen Energy ("AMERIGreen"), 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 proceeding pursuant to 52 Pa. Code §5.71, et. seq. As discussed 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. (the "Company") or ("Columbia"). In support of their Petition to Intervene, the NGS Parties state and aver as follows:

1. On or about March 18, 2016, Columbia submitted Supplement No. 241 to its Tariff Gas PA PUC No. 9, which proposes to increase annual revenues by approximately \$55.3 million.

2. The NGS Parties are represented in the above-captioned matter by the following

counsel:

Todd S. Stewart Attorney I.D. No. 75556 Hawke McKeon & Sniscak LLP 100 N. Tenth Street Harrisburg, PA 17101

Phone: (717) 236-1300 Fax: (717) 236-4841

Email: tsstewart@hmslegal.com

3. The NGS Parties currently serve customers throughout the spectrum of customer classes on the Columbia system, including residential, commercial and industrial customers. As

such, they have a direct and immediate interest in any modifications to any tariff which could

impact their ability to serve those customers and they have a clear interest in any tariff

provisions, whether new or existing, that directly have impacted their ability to reasonably and

fairly serve customers on the Columbia system.

4. The NGS Parties are still completing their final review of the rate filing and have

not yet taken any specific positions on any issues. The NGS Parties will be prepared to state

their other positions more fully in time for a prehearing conference.

5. Because the NGS Parties' serve customers on the Columbia system, where they

are all licensed to serve customers, they have a direct and immediate interest that is substantial

and cannot be represented by any other party to this proceeding, and they clearly will be bound

by any decision that the Commission might make with regard to Columbia's requested rate

increase and accompanying tariff changes. Therefore, the NGS Parties request that their

intervention be granted and that they be allowed full party status in this matter.

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WHEREFORE, the NGS Parties hereby petition the Pennsylvania Public Utility Commission to intervene in the above-captioned matter and request full party status.

Respectfully submitted,

Todd S. Stewart

PA Attorney I.D. #75556

Hawke McKeon & Sniscak LLP

100 North Tenth Street Harrisburg, PA 17101

E-mail: tsstewart@hmslegal.com

Telephone: (717) 236-1300 Facsimile: (717) 236-4841

Counsel for Shipley Choice, LLC d/b/a Shipley Energy, AMERIGreen Energy, Interstate Gas Supply, Inc. d/b/a IGS Energy and Dominion Retail, Inc. d/b/a Dominion

Energy Solutions ("NGS Parties")

DATED: April 6, 2016