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April 27, 2016

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.
Docket No. R-2016-2529660

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Direct Energy's Prehearing Memorandum with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Carl R. Shultz

CRS/lww
Enclosure

cc: Hon. Katrina L. Dunderdale w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Direct Energy's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email and/or First Class Mail

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Dated: April 27, 2016



Carl R. Shultz, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2016-2529660
v.	:	
	:	
Columbia Gas of Pennsylvania, Inc.	:	
	:	

**PREHEARING MEMORANDUM
OF DIRECT ENERGY SERVICES, LLC**

Pursuant to 52 Pa. Code § 5.222 and the Prehearing Conference Notice, and subject to the granting of the Petition to Intervene filed on April 25, 2016 by Direct Energy Business, LLC, Direct Energy Services, LLC, and Direct Energy Business Marketing, LLC (collectively, “Direct Energy”) in the above captioned proceeding, Direct Energy submits this Prehearing Memorandum.

I. REPRESENTATION

Direct Energy’s attorneys in this matter are:

Daniel Clearfield, Esquire
Carl R. Shultz, Esquire
Sarah C. Stoner, Esquire
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II. PRESENTLY IDENTIFIED ISSUES

On March 18, 2016, Columbia Gas of Pennsylvania, Inc. (“Columbia” or “Company”) filed Supplement No. 241 to Tariff Gas-PA. P.U.C. No. 9 to become effective May 17, 2016,

containing proposed changes in rates, rules, and regulations. Proposed Supplement No. 241 to Tariff Gas-PA. P.U.C. No. 9 was suspended by operation of law until December 19, 2016, unless otherwise directed by Order of the Commission.

The Commission's actions regarding the Company's proposals will have a substantial impact on Direct Energy's future involvement in the market. Direct Energy is concerned with the impact of Columbia's proposed rates and programs on the level of retail competition and with Direct Energy's ability to continue to do business in Company's service territory under the resulting rates and programs. Direct Energy is further concerned with charges related to Operational Flow Orders (OFOs) and Operational Matching Orders (OMOs) imposed by Columbia on suppliers.

Direct Energy (a) intends to carefully consider and review any other proposals that may be developed in this proceeding which could directly impact the customers currently served by Direct Energy, and (b) reserves the right to address other issues identified through its continued review and analysis of the filing or raised by other parties.

III. WITNESSES

Direct Energy continues to evaluate whether to present witnesses in this proceeding and will coordinate with other parties with similar concerns concerning any testimony it may present. Nevertheless, to the extent Direct Energy decides to present a witness in this proceeding, it has tentatively identified the following witness:

Orlando (Randy) Magnani
President
Randy Energy Consultants, LLC
19561 Caladesi Drive
Estero, FL 33967

Mr. Magnani will provide testimony related to the above listed issues. Direct Energy reserves the right to address other issues as may be developed during the course of this proceeding. Direct Energy reserves its right to add additional witnesses or change the identity of its witnesses at any time upon appropriate notice to the Presiding Officer and the parties.

IV. LITIGATION AND DISCOVERY RULES

Direct Energy is willing to discuss a procedural schedule and any proposed discovery modifications. Direct Energy does not anticipate any objections (a) to the procedural schedule, subject to the availability of its witness(es) on the hearing dates, and/or (b) to the typical discovery modifications in similar proceedings.

.V. SETTLEMENT

Direct Energy is willing to participate in settlement discussions with any party to narrow the issues in this matter.

Respectfully submitted,



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Date: April 27, 2016

Attorneys for Direct Energy