

COMMONWEALTH OF PENNSYLVANIA



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Consumer Advocate

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February 3, 2026

**Via Electronic Filing**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission v.  
Peoples Natural Gas Company, LLC  
Docket No. R-2026-3060165

Dear Secretary Homsher:

Attached for electronic filing, please find the Office of Consumer Advocate's Formal Complaint and Public Statement in this proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Ryan Morden  
Ryan Morden, Esq.  
Assistant Consumer Advocate  
PA Attorney I.D. # 335679  
Email: RMorden@paoca.org

Enclosures

cc: The Honorable Charles E. Rainey, Jr. (Email Only: crainey@pa.gov)  
Office of Special Assistants (Email Only: ra-OSA@pa.gov)  
Paul Diskin, TUS (Email Only: pdiskin@pa.gov)  
Daniel Searfoorce, TUS (Email Only: dsearfoorc@pa.gov)  
Sean Donnelly, TUS (Email Only: sdonnelly@pa.gov)  
Paul Zander, TUS (Email Only: pzander@pa.gov)  
Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2026-3060165  
 :  
 Peoples Natural Gas Company LLC :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Formal Complaint and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below. This document was filed electronically on the Commission's electronic filing system.

Dated this 3rd day of February 2026.

SERVICE BY E-MAIL ONLY

Allison Kaster, Director  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
akaster@pa.gov

NazAarah Sabree  
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*Small Business Advocate*

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*Counsel for Peoples Natural Gas Co. LLC*

Counsel for:  
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/s/ Ryan Morden  
Ryan Morden, Esq.  
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PA Attorney I.D. # 335679  
Email: RMorden@paoca.org  
  
Harrison W. Breitman, Esq.  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
Email: HBreitman@paoca.org

Dated: February 3, 2026

**Pennsylvania Public Utility Commission**

Formal Complaint Form

**1. COMPLAINANT**

Darryl A. Lawrence, Consumer Advocate

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
Dauphin County

Phone: (717) 783-5048  
Facsimile: (717) 783-7152

**2. RESPONDENT**

Peoples Natural Gas Company, LLC, Docket No. R-2026-3060165

**3. TYPE OF UTILITY**

Gas

**4. COMPLAINT**

- A. On January 30, 2026, Peoples Natural Gas Company, LLC (Peoples or The Company), submitted its pre-filing information in support of its annual reconciliation of purchased gas cost (PGC) rates, pursuant to Sections 53.64 and 53.65 of the Commission’s Rules and Regulations. 52 Pa. Code §§ 53.64-65.
- B. On or about April 1, 2026, Peoples will submit its definitive annual PGC filing to the Commission pursuant to Section 1307(f) of the Public Utility Code, 66 Pa. C.S. Section 1307(f).
- C. Peoples is a natural gas distribution company that serves approximately 700,000 residential, commercial and industrial customers in southwestern and western Pennsylvania, including the following counties: Allegheny, Armstrong, Beaver, Blair, Butler, Cambria, Clarion, Fayette, Greene, Indiana, Jefferson, Lawrence, Mercer, Somerset, Venango, Washington, and Westmoreland.
- D. The Public Utility Code provides that no rates of a natural gas distribution utility shall be deemed just and reasonable unless the Commission finds that the utility is pursuing a least cost fuel procurement policy, consistent with the utility's obligation to provide safe, adequate and reliable service. 66 Pa. C.S. § 1318. The Commission must find, among other things, that the utility has: (1) fully and vigorously

represented ratepayer interests before the Federal Energy Regulatory Commission; (2) taken all prudent steps to negotiate favorable gas supply contracts and to relieve its obligations under contracts that may be adverse to ratepayer interests; (3) taken all reasonable steps to obtain lower cost gas supplies; and (4) not withheld or caused to be withheld gas supplies that should have been utilized as part of a least cost fuel procurement policy. 66 Pa. C.S. § 1318(a)(1-4).

- E. The Consumer Advocate is empowered to represent the interests of Pennsylvania consumers before the Pennsylvania Public Utility Commission (the “Commission”) pursuant to Act 1976-161 of the General Assembly, as amended, 71 Pa. Stat. Ann. Sections 309-1, *et seq.*
- F. After initial review of Peoples’ filing information, the Consumer Advocate files this Formal Complaint in order to ensure that the Company's proposed PGC rate is consistent with a least cost fuel procurement policy and does not result in rates or charges that are excessive, unjust or unreasonable, discriminatory or otherwise contrary to Commission Regulations or policy.

## 5. RELIEF

The Consumer Advocate respectfully requests that the Commission:

- A. Hold evidentiary hearings before the Office of Administrative Law Judge, as mandated by Section 1307(f) of the Public Utility Code;
- B. Hold at least one public input hearing, if there is sufficient public interest in holding one;
- C. Deny any rate or tariff changes, which are not the result of a least cost fuel procurement policy as defined by the standards set forth in Section 1318 of the Public Utility Code, 66 Pa. C.S. Section 1318, and as defined by other applicable ratemaking standards;
- D. Ensure that the Company's PGC customers are only allocated those costs that should be borne by them;
- E. Deny any rate or tariff that is unjust, unreasonable, unduly discriminatory or contrary to sound ratemaking principles; and;
- F. Grant such other relief that the Commission may deem to be necessary, just or proper.

## 6. VERIFICATION

**Verification:**

***I, Darryl A. Lawrence, Consumer Advocate, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).***

/s/Darryl A. Lawrence  
**(Signature)**

2/3/2026  
**(Date)**

**7. LEGAL REPRESENTATION**

Harrison W. Breitman, Senior Assistant Consumer Advocate, PA Bar No. 320580  
Ryan Morden, Assistant Consumer Advocate, PA Bar No. 335679

555 Walnut Street, 5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Dauphin County

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**PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)**

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file a Formal Complaint in the proceedings before the Commission involving the proposed purchased gas cost rate change by Peoples Natural Gas Company, LLC (Peoples or The Company) at Docket No. R-2026-3060165.

On January 30, 2026, pursuant to Sections 53.64 and 53.65 of the Commission's Rules and Regulations, 52 Pa. Code Sections 53.64-65, Peoples submitted its pre-filing information in support of its annual reconciliation of purchased gas cost (PGC) rates. On or about April 1, 2026, Peoples will submit its definitive annual PGC filing to the Commission pursuant to Section 1307(f) of the Public Utility Code. 66 Pa. C.S. § 1307(f).

The Office of Consumer Advocate (OCA) has filed this Formal Complaint to ensure that the Commission examines Peoples PGC filing and that any implemented PGC rate is consistent with the least cost fuel procurement obligation under the Public Utility Code. A thorough analysis and review are appropriate because Section 1318 of the Public Utility Code mandates that purchased gas costs cannot be determined to be just and reasonable unless such rates result from a least cost fuel procurement policy. 66 Pa. C.S. §1318(a). The OCA will seek to ensure that only those purchased gas costs which meet the requirements of Section 1318 will be paid by Peoples' ratepayers. The OCA will also seek to ensure that the rates approved by the Commission are otherwise just and reasonable, and not unduly discriminatory or excessive.



Commonwealth of Pennsylvania  
**Pennsylvania Public Utility Commission**  
 Harrisburg, PA 17105-3265  
**EFILING - FILING DETAIL**

<b>Date Created</b>	<b>Filing Number</b>
2/3/2026	2946803

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

**Representing:** Office of Consumer Advocate

**Case Description:**

**Transmission Date:** 2/3/2026 11:54 AM

**Filed On:** 2/3/2026 11:54 AM

**eFiling Confirmation Number:** 2946803

File Name	Document Type	Upload Date
OCA Formal Complaint - Peoples 2026 1307(f).pdf	Formal Complaint	2/3/2026 11:54:17 AM

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg PA 17120 a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

**No paper submission is necessary for filings under 250 pages.**

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