



COMMONWEALTH OF PENNSYLVANIA

January 13, 2015

**E-Filed**

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

**Re: Petition of Philadelphia Gas Works for Approval of Demand Side  
Management Plan for FY 2016-2020 and Philadelphia Gas Works Universal  
Service and Energy Conservation Plan for 2014-2016 52 Pa. Code §62.4 –  
Request for Waivers  
Docket No. P-2014-2459362**

Dear Secretary Chiavetta:

I am delivering for filing today the Notice of Intervention and Public Statement, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding. As discussed with Commission staff, the legislatively-mandated Public Statement is included behind the Notice of Intervention.

Two copies have been served today on all known parties in this proceeding. A Certificate of Service to that effect is enclosed.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Sharon E. Webb".

Sharon E. Webb  
Assistant Small Business Advocate  
Attorney ID No. 73995

Enclosures

cc: Hon. Charles E. Rainey, Jr.  
Parties of Record  
Robert D. Knecht

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Petition of Philadelphia Gas Works for</b>	:	
<b>Approval of Demand Side Management Plan for</b>	:	
<b>FY 2016-2020</b>	:	
<b>And</b>	:	<b>Docket No. P-2014-2459362</b>
<b>Philadelphia Gas Works Universal Service</b>	:	
<b>and Energy Conservation Plan for 2014-2016</b>	:	
<b>52 Pa. Code §62.4 – Request for Waivers</b>	:	
<b>Docket No. P-2014-2459362</b>	:	

**NOTICE OF INTERVENTION  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Petition of Philadelphia Gas Works (“PGW” or “Company”) for Approval of Demand Side Management Plan for FY 2016-2020 and Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016 52 Pa. Code §62.4 – Request for Waivers Docket No. P-2014-2459362 that was filed with the Pennsylvania Public Utility Commission (“Commission”) on December 23, 2014. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Sharon E. Webb  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Suite 202  
300 North Second Street  
Harrisburg, Pennsylvania 17101  
(717) 783-2525  
(717) 783-2831 (fax)  
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Respectfully submitted,



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Sharon E. Webb  
Assistant Small Business Advocate  
Attorney I.D. No. 73995

For  
John R. Evans  
Small Business Advocate

Office of Small Business Advocate  
Suite 202  
300 North Second Street  
Harrisburg, PA 17101  
(717) 783-2525

Date: January 13, 2015

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Petition of Philadelphia Gas Works for</b>	:	
<b>Approval of Demand Side Management Plan for</b>	:	
<b>FY 2016-2020</b>	:	
<b>And</b>	:	<b>Docket No. P-2014-2459362</b>
<b>Philadelphia Gas Works Universal Service</b>	:	
<b>and Energy Conservation Plan for 2014-2016</b>	:	
<b>52 Pa. Code §62.4 – Request for Waivers</b>	:	
<b>Docket No. P-2014-2459362</b>	:	

**PUBLIC STATEMENT  
OF THE SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interests of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement setting forth concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Pennsylvania Public Utility Commission (“Commission”) or any other agency or court. This public statement relates to the Small Business Advocate’s intervention in the above-captioned Commission proceedings.

On December 23, 2014 Philadelphia Gas Works (“PGW”), filed a Petition for approval of a Demand-Side Management Plan for FY 2016-2020, and Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016 52 Pa. Code § 62.4 – Request for Waivers, initiating the above-captioned proceeding.

The Small Business Advocate is intervening in the above-captioned proceeding in

order to protect the interests of PGW's small business customers. A thorough inquiry by the Commission into all of the elements of PGW's petition is necessary to ensure that PGW's proposals for making and paying for distribution system improvements are in accord with the Public Utility Code and with the Commission's regulations and policies.

In view of the foregoing, the Small Business Advocate is requesting that the petition be subject to investigation and evidentiary hearings before the Commission. The Small Business Advocate will ask the Commission to deny or modify any aspect of the PGW's proposal that is not proven by PGW to be in accord with the Public Utility Code and with the Commission's regulations and policies.

Dated: January 13, 2015

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of Philadelphia Gas Works for :  
Approval of Demand Side Management Plan for :  
FY 2016-2020 :  
And :                   Docket No. P-2014-2459362  
Philadelphia Gas Works Universal Service :  
and Energy Conservation Plan for 2014-2016 :  
52 Pa. Code §62.4 – Request for Waivers :**

**CERTIFICATE OF SERVICE**

I certify that I am serving two copies of the Notice of Intervention and Public Statement, on behalf of the Office of Small Business Advocate, by e-filing, e-mail, and/or first-class mail (unless otherwise noted) upon the persons addressed below:

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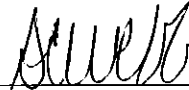
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Assistant Small Business Advocate  
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For:

John R. Evans  
Small Business Advocate

Date: January 13, 2015