



COMMONWEALTH OF PENNSYLVANIA

April 27, 2022

**E-FILED**

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

**Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.  
2022 Base Rate Filing / Docket No. R-2022-3031211**

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

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

Sincerely,

/s/ Steven C. Gray

Steven C. Gray  
Senior Supervising  
Assistant Small Business Advocate  
Attorney I.D. No. 77538

*Enclosures*

cc: Parties of Record  
Mark Ewen  
Robert D. Knecht

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission** :  
 :  
 v. : **Docket No. R-2022-3031211**  
 :  
**Columbia Gas of Pennsylvania, Inc.** :

**PREHEARING MEMORANDUM  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

**I. INTRODUCTION**

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to these proceedings. Representing the OSBA in the above-referenced matter is Assistant Small Business Advocate Steven C. Gray. Please address all correspondence in this matter as follows:

Steven C. Gray, Esq.  
Senior Supervising  
Assistant Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
(717) 783-2525  
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[sgray@pa.gov](mailto:sgray@pa.gov)

**II. FILING BACKGROUND**

On March 18, 2022, Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”) filed Supplement No. 337 Tariff Gas – Pa. P.U.C. No. 9 (“Supplement No. 337”) with the Commission. The rates set forth in Supplement No. 337, if approved by the

Commission, would increase Columbia's annual revenue by approximately \$82.2 million.

The OSBA filed a Complaint on March 28, 2022.

### **III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES**

Assisting in the development and presentation of the OSBA's case in this proceeding will be:

Robert D. Knecht  
Industrial Economics, Incorporated  
5 Plymouth Road  
Lexington, MA 02421  
(781) 249-9461  
[rdk@indecon.com](mailto:rdk@indecon.com)

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Cambridge, MA 02140  
(617) 354-0074  
[mewen@indecon.com](mailto:mewen@indecon.com)

The OSBA will participate in this proceeding to assure that the interests of small business customers are adequately represented and protected.

After an initial review of the materials submitted by Columbia, the OSBA has identified the following list of issues that it will evaluate in this proceeding:

- 1) Whether the Company's proposed class cost of service study reasonably reflects cost causation, past practice and Commission precedent;
- 2) Whether the Company's revenue allocation proposal reasonably reflects a proper class cost of service study, rate gradualism, credible competitive concerns and other established rate design principles;
- 3) Whether the Company's proposed rate design for Columbia's small business customers is consistent with allocated costs and other established rate design principles;
- 4) Whether the Company's negotiated rate revenues credibly reflect current competitive

market conditions, customer bypass potential and/or other factors that can reasonably affect negotiated rates; and

5) Whether the Company's proposed Revenue Normalization Adjustment for residential customers unreasonably shifts all volume-related business risk to non-CAP residential ratepayers without adequately compensating them for assuming that risk in the form of material reductions to allowed rates of return on equity.

The OSBA reserves the right to pursue additional issues that may arise throughout this proceeding.

#### **IV. SERVICE OF DOCUMENTS**

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date<sup>1</sup> as satisfying the in-hand requirement. At the time of this writing, hard copy delivery of documents to the OSBA is not possible. The OSBA requests that email delivery of documents also be provided to its witnesses identified above.

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

#### **V. DISCOVERY**

The OSBA does not propose any discovery modifications.

#### **VI. SETTLEMENT**

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

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<sup>1</sup> In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

**VII. HEARING AND BRIEFING SCHEDULE**

At the time of this writing, the parties are discussing a proposed procedural schedule.

Respectfully submitted,

/s/ Steven C. Gray

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Steven C. Gray, Esq.  
Senior Supervising  
Assistant Small Business Advocate  
Attorney ID No. 77538

Commonwealth of Pennsylvania  
Office of Small Business Advocate  
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(717) 783-2525  
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Dated: April 27, 2022

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	
v.	:	<b>Docket No. R-2022-3031211</b>
	:	
<b>Columbia Gas of Pennsylvania, Inc.</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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The Honorable Christopher P. Pell  
Deputy Chief Administrative Law Judge  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

DATE: April 27, 2022

/s/ Steven C. Gray

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Steven C. Gray  
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