

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560

 @pa_oca

 /pennoca

FAX (717) 783-7152
consumer@paoca.org

June 5, 2020

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 2021-2023

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:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Laura J. Antinucci
Laura J. Antinucci
Assistant Consumer Advocate
PA Attorney I.D. # 327217
E-Mail: LAntinucci@paoca.org

Enclosures:

cc: The Honorable Christopher Pell (**email only**)
The Honorable Marta Guhl (**email only**)
Certificate of Service

*289682

CERTIFICATE OF SERVICE

Re: Petition of Philadelphia Gas Works :
for Approval of Demand-Side Management :
Plan For FY 2021-2023 :
: 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 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention 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:

Dated this 5th day of June 2020.

SERVICE BY E-MAIL ONLY

Carrie B. Wright, Esquire
Gina L. Miller, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Sharon E. Webb, Esquire
Daniel G. Asmus, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923

Deanne M. O'Dell, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101

Joline Price, Esquire
Elizabeth R. Marx, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Charis Mincavage, Esquire
Adeolu A. Bakare, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Josie B. H. Pickens, Esquire
Robert W. Ballenger, Esquire
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102

Joseph Otis Minott, Esquire
Ernest Logan Welde, Esquire
Clean Air Council
135 South 19th Street, Suite 300
Philadelphia, PA 19103

/s/ Laura J. Antinucci

Laura J. Antinucci

Assistant Consumer Advocate

PA Attorney I.D. # 327217

E-Mail: LAntinucci@paoca.org

Darryl A. Lawrence

Senior Assistant Consumer Advocate

PA Attorney I.D. # 93682

E-Mail: DLawrence@paoca.org

Counsel for:

Office of Consumer Advocate

555 Walnut Street

5th Floor, Forum Place

Harrisburg, PA 17101-1923

Phone: (717) 783-5048

Fax: (717) 783-7152

Dated: June 5, 2020

*289683

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Philadelphia Gas Works :
For Approval of Demand-Side Management :
Plan For FY 2021-2023 :
: 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 :

NOTICE OF INTERVENTION
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code § 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Darryl A. Lawrence
Senior Assistant Consumer Advocate
Laura J. Antinucci
Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Telephone: (717) 783-5048
Fax: (717) 783-7152

Respectfully Submitted,

/s/ Laura J. Antinucci
Laura J. Antinucci
Assistant Consumer Advocate
PA Attorney I.D. # 327217
E-Mail: LAntinucci@paoca.org

Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

DATED: June 5, 2020

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

Act 161 of the General Assembly, 71 P.S. § 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Office of Consumer Advocate (OCA) determined to Intervene in Philadelphia Gas Works' (PGW or the Company) Petition for Approval of Demand Side Management Implementation Plan for FY 2021-2023 (Petition or Implementation Plan).

On May 7, 2020, PGW filed its Implementation Plan which details the program budgets and implementation of PGW's EnergySense Demand-Side Management Portfolio from September 1, 2020 to August 31, 2023. Within the 2021-2023 Implementation Plan, PGW proposes to continue four of the existing five Demand-Side Management (DSM) programs: (1) Residential Equipment Rebates Program; (2) Commercial Equipment Rates Program; (3) Residential Constructions Grant Program; and (4) the online Smart Thermostat Marketplace Program. Petition at 15. PGW also proposes to "wind-down" and end the Efficient Building Grants and Efficient Construction Grants for commercial/multifamily customers, with a brief wind-down period in FY 2021 to pay grants for projects approved in Phase II. Id. PGW estimates that the Implementation Plan programs will cost \$7,105,159 from FY 2021 – FY 2023 and projects 169,517 MMBtu of natural gas savings throughout FY 2021 – FY 2023 and 2,995,516 MMBtu of lifetime natural gas savings. Id. at 7-8.

The OCA determined to intervene in this proceeding to protect the interests of PGW's customers; to ensure that any increase in rates resulting from the adoption of the proposed

programs and any related expenses are just and reasonable; and to ensure that any resulting benefits of the program are captured and properly matched to the costs.

The OCA intends to review PGW's proposed plan including the cost-effectiveness of the programs, and specifically, the newly proposed online Smart Thermostat Marketplace rebate offering program. The OCA will seek to ensure that any costs that are sought to be recovered are consistent with Commission regulations, statutes and applicable case law and result in rates which are just and reasonable.

289678.docx