



COMMONWEALTH OF PENNSYLVANIA

September 1, 2020

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 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:

Enclosed please find the Notice of Intervention, Public Statement, and Verification, 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/ Sharon E. Webb

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

Enclosures

cc: Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**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 2021-2023 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 May 7, 2020. 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
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Office of Small Business Advocate
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Respectfully submitted,

/s/ Sharon E. Webb

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

For
John R. Evans
Small Business Advocate

Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525

Date: September 1, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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| Docket No. P-2014-2459362 | : | |

**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 May 7, 2020 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. While the case caption reflects a period of 2016-2020, the text of the petition reveals that the petition is actually

for the period 2021-2023.

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: September 1, 2020

VERIFICATION

I, John R. Evans, hereby state that the facts set forth herein above 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).

Date: 09/01/2020



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

The Honorable F. Joseph Brady
Administrative Law Judge
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DATE: September 1, 2020

/s/ Sharon E. Webb

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