



COMMONWEALTH OF PENNSYLVANIA

October 9, 2018

E-FILED

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

Re: Implementation of Act 58 of 2018 / Docket No. M-2018-3003269

Dear Secretary Chiavetta:

In lieu of formal comments, the Office of Small Business Advocate (“OSBA”) submits this letter in support of the Commission’s proposed interpretation and implementation of Act 58 of 2018, which added Section 1330 to the Public Utility Code. Most importantly, the OSBA agrees with the Commission’s proposal to require utilities seeking to obtain Commission approval of an alternative rate or rate mechanism to do so through a Section 1308(d) base rate proceeding.

The OSBA notes that Section 1330 does not specify the consumer protections that are necessary for any alternative rate or rate mechanism to be found to be just, reasonable and in the public interest. The OSBA respectfully suggests that any utility seeking approval for such a mechanism include in its filing the consumer protections proposed and benefits to consumers.

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

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Rose Triscari".

Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921

cc: See Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Implementation of Act 58 of 2018

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Docket No. M-2018-3003269

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (*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).

Tanya J. McCloskey, Esquire
Acting Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
tmccloskey@paoca.org
(Counsel for OCA)
(Email and Hand Delivery)

Kriss Brown, Esquire
Law Bureau
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
kribrown@pa.gov

Richard Kanaskie, Esquire
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
rkanaskie@pa.gov
(Counsel for BIE)
(Email and Hand Delivery)

DATE: October 9, 2018


Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921