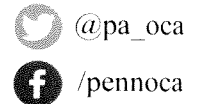


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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



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

March 2, 2020

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

Re: Petition for Expedited Approval of PGW's
Letter Request to Amend its Universal Service
and Energy Conservation Plan Pursuant to
2019 Amendments to Policy Statement at
Docket No. M-2019-3012599
Docket No. P-2020-3018867

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,

Handwritten signature of Christy M. Appleby.

Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org

Enclosures:

cc: Office of Administrative Law Judge (OALJ)
Certificate of Service

*284384

CERTIFICATE OF SERVICE

Re: Petition for Expedited Approval of PGW's :
Letter Request to Amend its Universal : Docket No. P-2020-3018867
Service and Energy Conservation Plan :
Pursuant to 2019 Amendments to Policy :
Statement at Docket No. M-2019-3012599 :

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 2nd day of March 2020.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Richard A. Kanaskie, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

John R. Evans, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

Elizabeth R. Marx, Esquire
Ria M. Pereira, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Lauren M. Burge, Esquire
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street
44th Floor
Pittsburgh, PA 15219

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

Graciela Christlieb, Esquire
Philadelphia Gas Works
800 West Montgomery Ave.
Philadelphia, PA 19122



Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org

Phillip D. Demanchick
Assistant Consumer Advocate
PA Attorney I.D. # 324761
E-Mail: PDemanchick@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: March 2, 2020
*284386

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition for Expedited Approval of PGW's Letter :
Request to Amend its Universal Service and : Docket No. P-2020-3018867
Energy Conservation Plan Pursuant to 2019 :
Amendments to Policy Statement at Docket No. :
M-2019-3012599 :

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:

Christy M. Appleby
Phillip D. Demanchick
Assistant Consumer Advocates
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152

Respectfully Submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CApplby@paoca.org

Phillip D. Demanchick
Assistant Consumer Advocate
PA Attorney I.D. # 324761
E-Mail: PDemanchick@paoca.org

DATED: March 2, 2020
*284380

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

Act 161 of the Pennsylvania 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 Acting Consumer Advocate determined to file a Notice of Intervention and Answer, and to participate in proceedings before the Commission involving the Petition for Expedited Approval of PGW's Letter Request to Amend its Universal Service and Energy Conservation Plan Pursuant to 2019 Amendments to Policy Statement at Docket No. M-2019-3012599

On January 6, 2020, Philadelphia Gas Works (PGW or Company) voluntarily proposed a pilot program implementing new maximum energy burdens (pilot programs) for its Customer Assistance Program (CAP), the Customer Responsibility Program (CRP). PGW proposes to reduce the energy burdens to 6% for customers with income at or below 51-100% and 101-150% of the Federal Poverty Level (FPL) and to 4% for customers with income at or below 0-50% of the FPL. Petition at ¶¶ 5, 8, App. H. PGW also proposes to remove the obligation to pay \$5/month towards pre-program arrears and to modify the consumption limits. Petition at ¶¶ 5, 8, App. H. PGW's proposed Amended Plan indicates that the proposed plan costs will increase from \$68,620,083 in 2020 to \$97,104,143. PGW Amended USECP 2017-2022 at App. A.

The objective of the Acting Consumer Advocate in intervening in this case is to protect the interests of consumers in PGW's service territory. The OCA seeks to ensure that the universal service programs are reasonable and appropriately designed. The OCA will also seek to ensure that the costs that are sought to be recovered are consistent with the Commission regulations, statutes and applicable case law and result in rates that are just and reasonable.