



COMMONWEALTH OF PENNSYLVANIA

January 11, 2024

E-FILED

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

Re: Peoples Natural Gas Company LLC (Peoples Natural Gas Division and Peoples Gas Division) Base Rate Case Filing Original Tariff GAS – PA PUC No. 48 / Docket No. R-2023-3044549

Dear Secretary Chiavetta:

Enclosed please find the Complaint, 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/ Steven C. Gray

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

Enclosures

cc: Mark Ewen
Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2023-3044549
	:	
Peoples Natural Gas Company LLC	:	
	:	

**COMPLAINT OF THE
SMALL BUSINESS ADVOCATE**

1. The Complainant is:

NazAarah Sabree
Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

2. The name and address of the Complainant's attorney is:

Steven Gray
Senior Supervising
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
sgray@pa.gov

3. The respondent utility is:

Peoples Natural Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212

4. The Complainant is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. This Complaint is filed against the rates, terms, and other provisions of Original Tariff Gas - Pa. P.U.C. No. 48, which was filed on December 29, 2023, by Peoples Natural Gas Company LLC (“Peoples NG” or the “Company”). Peoples NG consists of two divisions – Peoples Natural Gas Division and Peoples Gas Division. The proposed Original Tariff Gas - Pa. P.U.C. No. 48, if approved by the Commission, would result in an overall revenue increase for Peoples NG of approximately \$156.0 million per year. In addition, the December 29th filing included a proposed Weather Normalization Adjustment (“WNA”), which supposedly reflects “normalized weather conditions.” After preliminary review of the materials filed by the Company in support of the proposed Original Tariff Gas - Pa. P.U.C. No. 48, Complainant believes, and therefore avers, that those materials may be insufficient to justify the rate increase requested and that the Company’s present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to small business customers.

6. Complainant believes, and therefore avers, that the Company’s proposed rates, rate design, proposed WNA, and cost and revenue allocation are or may be unjust, unreasonable, and unlawfully discriminatory in violation of, inter alia, Sections 1301 and 1304 of the Public Utility Code, 66 Pa. C.S. §§1301 and 1304, and contrary to appropriate public policy and sound ratemaking considerations, and may not be supported by the materials filed by Peoples NG.

7. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- a. Suspend and investigate the operation of Original Tariff Gas - Pa. P.U.C. No. 48;
- b. At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Original Tariff Gas - Pa. P.U.C. No. 48 to the extent required to ensure that Peoples NG's rates are lawful, just, reasonable, and not unduly discriminatory; and
- c. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

/s/ Steven C. Gray

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

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
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(717) 783-2525
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Dated: January 11, 2024

proposed general rate increase is necessary to ensure that the increase is lawful, just, reasonable, and not unduly discriminatory.


In view of the foregoing, the Small Business Advocate will participate in proceedings before the Commission to investigate the reasonableness of the proposed general rate increase as well as the WNA. The Small Business Advocate will ask the Commission to deny any proposed new rates and other tariff changes that apply to small business customers that are not proven by Peoples NG to be lawful, just, reasonable, and not unduly discriminatory to the Company's small business customers.

Dated: January 11, 2024

VERIFICATION

I, NazAarah Sabree, 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: January 11, 2024



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Peoples Natural Gas Company LLC : **Docket No. R-2023-3044549**
(Peoples Natural Gas Division and :
Peoples Gas Division) Base Rate Case :
Filing Original Tariff GAS – PA PUC :
No. 48 :

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 Charles E. Rainey Jr.
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DATE: January 11, 2024

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