



COMMONWEALTH OF PENNSYLVANIA
OFFICE OF SMALL BUSINESS ADVOCATE

August 20, 2012

HAND DELIVERY

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

RECEIVED
2012 AUG 20 PM 3:12
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SECRETARY'S BUREAU

**Re: Petition for Generic Investigation or Rulemaking Regarding "Gas-On-Gas"
Competition Between Jurisdictional Natural Gas Distribution Companies
Docket No. P-2011-2277868**

Dear Secretary Chiavetta:

I am delivering for filing today the original of the Public Statement, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

Two copies have been served today on all known parties in this proceeding. A Certificate of Service to that effect is enclosed.

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

Sincerely,

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

Enclosures

cc: Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition for Generic Investigation or	:	
Rulemaking Regarding “Gas-On-Gas”	:	
Competition Between Jurisdictional Natural	:	Docket No. P-2011-2277868
Gas Distribution Companies	:	

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest 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 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating 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 (the “Commission”) or any other agency or court.

This public statement relates to the Joint Petition filed by the Office of Small Business Advocate (“OSBA”), Bureau of Investigation and Enforcement (“BI&E”), Office of Consumer Advocate (“OCA”), Peoples TWP LLC (“Peoples TWP”), and Peoples Natural Gas Company (“Peoples”) (together, “Joint Petitioners”) on December 8, 2011. The Joint Petition requests that the Commission institute an investigation or rulemaking, pursuant to Sections 5.41 and 5.43 of the Commission’s regulations, 52 Pa. Code §§ 5.41 and 5.43, to address distribution rate discounting among natural gas distribution companies (“NGDCs”) with overlapping service territories, often referred to as “gas-on-gas” competition.

The OSBA is participating as a party to the Joint Petition in order to protect the interests of the Commonwealth’s small business customers. The OSBA will participate in the proceeding

before the Commission to investigate competition among NGDCs, flexing of distribution rates to meet such competition, and the treatment of flexed revenues for ratemaking purposes in future ratemaking proceedings.

Dated: August 14, 2012

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition for Generic Investigation or Rulemaking:

Regarding "Gas-On-Gas Competition" : **Docket No. P-2011-2277868**
Between Jurisdictional Natural Gas :
Distribution Companies :

CERTIFICATE OF SERVICE

I certify that I am serving two copies of the Public Statement, on behalf of the Office of Small Business Advocate, by e-mail and first-class mail (unless otherwise noted) upon the persons addressed below:

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