



COMMONWEALTH OF PENNSYLVANIA

February 7, 2013

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 a Distribution System
Improvement Charge
Docket No. P-2012-2337737**

Dear Secretary Chiavetta:

I am delivering for filing today the Notice of Intervention and Public Statement, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding. As discussed with Commission staff, the legislatively-mandated Public Statement is included behind the Notice of Intervention.

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,

A handwritten signature in black ink, appearing to read 'Sharon E. Webb'.

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

Enclosures

cc: Parties of Record
Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works :
for Approval of a Distribution System : **Docket No. P-2012-2337737**
Improvement Charge :

**NOTICE OF INTERVENTION
OF THE SMALL BUSINESS ADVOCATE**

1. The Intervenor is:

Steven C. Gray.
Acting Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
sgray@pa.gov

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

Sharon E. Webb
Assistant Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
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(717) 783-2831 (fax)
swebb@pa.gov

3. The respondent utility is:

Philadelphia Gas Works
800 Montgomery Avenue
Philadelphia, PA 19122

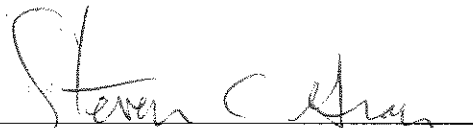
4. The Intervenor is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission ("Commission").

5. This Intervention is filed regarding the Petition of Philadelphia Gas Works for Approval of a Distribution System Improvement Charge ("Petition") that was filed with the Commission on January 18, 2013.

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

- A. Direct the Office of Administrative Law Judge to holding hearings on the *Petition* and prepare an initial decision; and
- B. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,



Steven C. Gray
Acting Small Business Advocate
Attorney ID No. 77538

Office of Small Business Advocate
300 North Second Street, Suite 1102
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(717) 783-2525
(717) 783-2831 (fax)

Dated: February 7, 2013

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of Philadelphia Gas Works :
for Approval of a Distribution System : Docket No. P-2012-2337737
Improvement Charge :**

**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 January 18, 2013, Philadelphia Gas Works (“PGW”), filed a Petition for approval of a distribution system improvement charge, initiating the above-captioned proceeding.

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: February 7, 2013

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for :
Approval of Distribution System : **Docket No. P-2012-2337737**
Improvement Charge :

CERTIFICATE OF SERVICE

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

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Date: February 7, 2013


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