

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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February 7, 2013

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17101

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

Dear Secretary Chiavetta:

Attached for electronic filing is the Notice of Intervention and Public Statement of the Office of Consumer Advocate in the above-referenced proceeding.

Copies have been served on the parties listed on the attached Certificate of Service.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Erin L. Gannon".

Erin L. Gannon
Assistant Consumer Advocate
PA Attorney I.D. #83487

Attachment

cc: Commissioner Robert F. Powelson, Chairman
Commissioner John F. Coleman, Jr., V. Chairman
Commissioner James H. Cawley
Commissioner Wayne E. Gardner
Commissioner Pamela A. Witmer
Bohdan Pankiw, Law Bureau
David Screven, Law Bureau
Paul Diskin, Bureau of Technical Utility Services
Erin Laudenslager, Bureau of Technical Utility Services

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

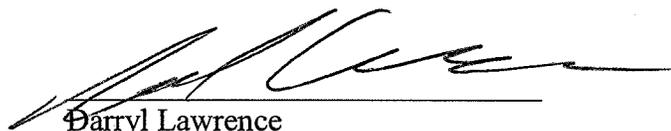
NOTICE OF INTERVENTION

Pursuant to 71 P.S. § 309-1, *et seq.*, and 52 Pa. Code § 5.71(a)(1), 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:

Erin L. Gannon
Assistant Consumer Advocate
Darryl A. Lawrence
Assistant Consumer Advocate

Office of Attorney General
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, Pa 17101-1923

Respectfully submitted,



Darryl Lawrence
Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

Dated: February 7, 2013

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 (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file an Intervention and participate in proceedings before the Commission involving the initial Distribution System Improvement Charge (DSIC) tariff and rate proposed by Philadelphia Gas Works (PGW or the Company) at Docket No. P-2012-2337737.

On January 18, 2013, PGW filed a Petition for Approval of a DSIC and a proposed DSIC tariff, pursuant to 66 Pa. C.S. § 1353. The Company estimates a DSIC rate of \$0.04540 per Ccf for Residential customers. The Consumer Advocate has filed this Intervention with the Commission to ensure that each aspect of PGW's proposed tariff is scrutinized and that the proposed DSIC rate is consistent with Sections 1301, 1351, 1353, 1357 and 1358 of the Public Utility Code, 66 Pa.C.S. §§ 1301, 1351, 1353, 1357, 1358, and sound public policy. A thorough analysis and review are appropriate because the proposed tariff will implement new legislation. It is critical that the DSIC be calculated correctly, recover only costs of DSIC-eligible property, and be applied equally to all customer classes. The OCA, therefore, will seek to ensure that only those costs which comply with the requirements of the Public Utility Code will be paid through a DSIC by the Company's ratepayers. In addition, the OCA will also seek to ensure that any DSIC rate approved by the Commission is not unduly discriminatory or otherwise excessive.

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the foregoing document, Notice of Intervention and Public Statement of the Office of Consumer Advocate, 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 7th day of February 2013.

SERVICE BY EMAIL & FIRST CLASS MAIL

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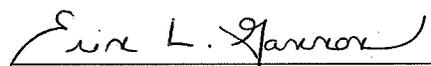
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