



COMMONWEALTH OF PENNSYLVANIA

May 8, 2014

E-FILED

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

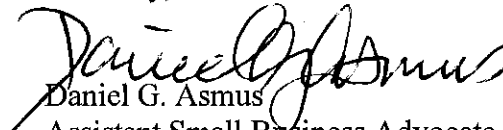
**Re: Supplement No. 210 to Tariff Gas - Pa PUC. No. 9 of Columbia Gas of
Pennsylvania, Inc.
Docket No. R-2014-2407345**

Dear Secretary Chiavetta:

Enclosed for filing is the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

As evidenced by the enclosed certificate of service, all parties have been served as indicated.

Sincerely,


Daniel G. Asmus
Assistant Small Business Advocate
Attorney ID No. 83789

Enclosure

cc: Parties of Record

Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**SUPPLEMENT NO. 210 TO TARIFF GAS :
PA. P.U.C. NO. 9 OF COLUMBIA GAS OF : DOCKET NO. R-2014-2407345
PENNSYLVANIA, INC. :**

**OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding.

Representing the OSBA in this matter is Assistant Small Business Advocate Daniel G. Asmus.

Please address all correspondence as follows:

Daniel G. Asmus, Esquire
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, Pennsylvania 17101
(717) 783-2525
(717) 783-2831 (fax)
dasmus@pa.gov

II. PROCEDURAL BACKGROUND

Columbia Gas of Pennsylvania, Inc. (“Columbia”) filed Supplement No. 210 to Tariff Gas-Pa. P.U.C. No. 9 (“Supplement No. 210”), on February 26, 2014. The proposed Pilot Rider New Area Service (“Pilot Rider NAS”), if approved by the Commission, would provide the Company with an alternative approach for residential customers and developers to pay the upfront deposit charged by Columbia to extend its facilities to provide natural gas service.

OSBA filed a Complaint on March 19, 2014. .

Administrative Law Judge (“ALJ”) Mark A. Hoyer was assigned to this proceeding and issued a Prehearing Conference Order on April 28, 2014, informing the parties that the Initial Prehearing Conference on this case will be held on May 9, 2014.

The OSBA submits this prehearing memorandum in accordance with the Prehearing Conference Order.

III. IDENTIFICATION OF WITNESSES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 – Fax
rdk@indecon.com

The OSBA requests that all parties serve copies of all documents, including discovery,

testimony and briefs, upon Mr. Knecht, simultaneously with service upon the OSBA.¹

IV. IDENTIFICATION OF ISSUES

The OSBA has intervened in this proceeding in order to protect the interests of Columbia's small business customers.

After an initial review of the materials submitted by Columbia, the OSBA has identified the following list of issues that it will evaluate in this consolidated proceeding:

1. Whether small business customers, in general, should be included in the new Pilot Rider NAS.
2. Whether residential developers, the one small business category that is included in the proposed Pilot Rider NAS are appropriately and equitably dealt with in the proposal.

The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

V. DISCOVERY

Discovery has been ongoing for several weeks. The OSBA will cooperate with the ALJ and other parties to arrive at any mutually agreeable discovery modifications.

VI. SERVICE OF DOCUMENTS

The OSBA agrees to accept electronic mail delivery of documents on the due date as satisfying the in-hand requirement, *provided that such documents are followed by hard copy delivery to OSBA by first class mail*. Service by electronic mail *only* is not acceptable. The

¹ The OSBA excepts I&E from this request in acknowledgment of I&E's policy of serving only counsel to the parties, not witnesses.

OSBA requests that such hard copies are also provided to its witness identified above.

In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. The OSBA also requests that all parties serve an electronic copy of all interrogatory responses upon the OSBA and the OSBA witness identified above.

VII. SETTLEMENT

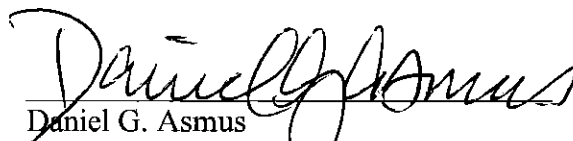
The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

VIII. PROCEDURAL SCHEDULE

The OSBA will work with the ALJ and the parties to arrive at a mutually agreeable schedule.

In light of the Governor's commitment to reduce the operating budget of Commonwealth Offices, the OSBA respectfully requests that the evidentiary hearings take place in Harrisburg.

Respectfully submitted,


Daniel G. Asmus
Attorney ID No. 83789
Assistant Small Business Advocate

For:

John R. Evans
Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Dated: May 8, 2014

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SUPPLEMENT NO. 210 TO TARIFF GAS :
PA. P.U.C. NO. 9 OF COLUMBIA GAS OF : **DOCKET NO. R-2014-2407345**
PENNSYLVANIA, INC. :

CERTIFICATE OF SERVICE

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

Hon. Mark A. Hoyer
Administrative Law Judge
Pa. Public Utility Commission
301 Fifth Avenue - #220
Pittsburgh, PA 15222
(412) 565-3550
(412) 565-5692 (fax)
mhoyer@pa.gov

Nancy J. D. Krajovic, Esquire
Theodore J. Gallagher, Esquire
Columbia Gas of Pennsylvania
121 Champion Way - #100
Canonsburg, PA 15317
(724) 416-6370
(724) 416-6382 (fax)
nkrajovic@nisource.com
tjgallagher@nisource.com

Charis Mincavage, Esquire
Elizabeth P. Trinkle, Esquire
McNees Wallace & Nurice, LLC
P. O. Box 1166
Harrisburg, PA 17108-1166
cmincavage@mwn.com
etrinkle@mwn.com

Patrick M. Cicero, Esquire
Harry S. Geller, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

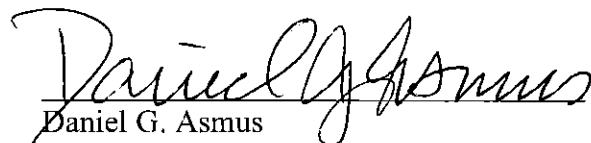
Amy E. Hirakis, Esquire
Candis A. Tunilo, Esquire
Office of Consumer Advocate
555 Walnut Street - 5th Floor
Harrisburg, PA 17101-1923
(717) 783-5048
(717) 783-7152 (fax)
ahirakis@paoca.org
ctunilo@paoca.org
(E-mail and Hand Delivery)

Allison C. Kaster, Esquire
Regina L. Matz, Esquire
Bureau of Investigation and Enforcement
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105
(717) 787-1976
(717) 772-2677 (fax)
akaster@pa.gov
rmatz@pa.gov
(E-mail and Hand Delivery)

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
(First-class Mail Only)

Andrew S. Tubbs, Esquire
Michael W. Hassell, Esquire
Post & Schell, P.C.
17 North Second Street - 12th Floor
Harrisburg, PA 17101-1601
(717) 731-1970
(717) 731-1985 (fax)
atubbs@postschell.com
mhassell@postschell.com

Thomas J. Sniscak, Esquire
William E. Lehman, Esquire
Steven K. Haas, Esquire
Todd S. Stewart, Esquire
Hawke McKeon & Sniscak, LLP
P. O. Box 1778
Harrisburg, PA 17105


Daniel G. Asmus
Assistant Small Business Advocate
Attorney ID No. 83789

Date: May 8, 2014