



COMMONWEALTH OF PENNSYLVANIA

April 11, 2018

**E-FILED**

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

**Re: Philadelphia Gas Works Large Customer Transportation Service Tariff /  
Docket No. R-2018-3000739**

Dear Secretary Chiavetta:

I am delivering for filing today my Notice of Intervention, 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,

A handwritten signature in blue ink, appearing to read "S. Webb".

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

***Enclosures***

cc: The Honorable Charles E. Rainey, Jr.  
Robert D. Knecht  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Philadelphia Gas Works Large  
Customer Transportation Service  
Tariff** : **Docket No. R-2018-3000739**  
:

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

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Philadelphia Gas Works. (“PGW” or “Company”) Supplement No. 111 to Philadelphia Gas Works Tariff - Pa. P.U.C. No. 2 relative to the Company’s proposed Large Customer Transportation Service Tariff (“Rate LT”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on March 23, 2018. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

**Sharon E. Webb**  
Assistant Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, Pennsylvania 17101  
(717) 783-2525  
(717) 783-2831 (fax)  
[swebb@pa.gov](mailto:swebb@pa.gov)

Respectfully submitted,



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**Sharon E. Webb**  
**Assistant Small Business Advocate**  
**Attorney I.D. No. 73995**

**For: John R. Evans**  
**Small Business Advocate**

**Office of Small Business Advocate**  
**300 North Second Street, Suite 202**  
**Harrisburg, PA 17101**  
**(717) 783-2525**

**Date: April 11, 2018**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Philadelphia Gas Works Large** :  
**Customer Transportation Service** : **Docket No. R-2018-3000739**  
**Tariff** :

**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 (“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 Public Utility Commission (“Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of an intervention relative to the proposed March 23, 2018, tariff filing of Philadelphia Gas Works. (“PGW” or the “Company”).

The Small Business Advocate files this intervention relative to the Company’s proposed Large Transportation Service Tariff in order to protect the interests of the Company’s small business customers. A thorough inquiry by the Commission into all of the elements of the Company’s proposed tariff is necessary to ensure that the proposed tariff 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 tariff. 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 PGW to be lawful, just, reasonable, and not unduly discriminatory to the Company's small business customers.

Dated: April 11, 2018

**VERIFICATION**

I, John R. Evans, 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: April 11, 2018

  
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(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Philadelphia Gas Works Large** :  
**Customer Transportation Service** : **Docket No. R-2018-3000739**  
**Tariff** :

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (*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.  
Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[crainey@pa.gov](mailto:crainey@pa.gov)  
(Email and Hand Delivery)


Paul Diskin, Director  
Bureau of Technical Utility Services  
Pennsylvania Public Utility Commission  
400 North Street  
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(Counsel for OCA)  
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213 Market Street, 8<sup>th</sup> Floor  
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(Counsel for PGW)

Richard Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)  
(Counsel for BIE)  
(Email and Hand Delivery)

DATE: April 11, 2018

  
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Sharon E. Webb  
Assistant Small Business Advocate  
Attorney I.D. No. 73995