



COMMONWEALTH OF PENNSYLVANIA

April 17, 2018

E-FILED

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

**Re: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc. /
Docket No. R-2018-2647577**

Dear Secretary Chiavetta:

I am delivering for filing today my Prehearing Memorandum, 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 that reads "Daniel G. Asmus".

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

Enclosures

cc: The Honorable Jeffrey A. Watson
Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2018-2647577
	:	Docket No. C-2018-3000773
Columbia Gas of 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 202
Harrisburg, Pennsylvania 17101
(717) 783-2525
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dasmus@pa.gov

II. FILING BACKGROUND

On March 16, 2018, Columbia Gas of Pennsylvania (“Columbia” or the “Company”) filed Supplement No. 267 to Columbia’s Tariff Gas, Pa. P.U.C. No. 9 (“Supplement No. 267”) with the Commission. The proposed Tariff, if approved by the Commission, would increase the Company’s distribution rates by \$46.9 million per year.

On March 28, 2018, the OSBA filed a Complaint against Supplement No. 267.

On April 10, 2018, Administrative Law Judge (“ALJ”) Jeffrey A. Watson issued a Prehearing Conference Order setting April 18, 2018, as the date for a telephonic Prehearing Conference. On that same date, a Corrected Call-In Telephone Hearing Conference Notice was issued by ALJ Watson. This Prehearing Memorandum is being served on the parties consistent with the Prehearing Conference Order.

III. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES

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 will participate in this proceeding to assure that the interests of small business customers are adequately represented and protected.

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 proceeding:

1. Whether Supplement No. 267 is just, reasonable, and lawful.
2. Whether Supplement No. 267 sets rates in a discriminatory manner for the Company's small business customers.
3. Whether all costs related to universal service programs are allocated to the residential class.
4. Whether test year load forecasts and post-test year capital expenditures are just and reasonable.
5. Whether the merchant function charge, cost allocation, revenue allocation, and rate design for small business customers are just and reasonable.

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

IV. SERVICE OF DOCUMENTS

The OSBA requests that all parties serve a hard copy of any document filed in this case upon the OSBA and the OSBA 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. Service by electronic mail *only* is not acceptable.

V. SETTLEMENT

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

VI. HEARING AND BRIEFING SCHEDULE

At the time of this writing, the parties are pursuing agreement on a proposed procedural schedule. In light of the Governor's commitment to reduce state spending, 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 202
Harrisburg, PA 17101

Dated: April 17, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 :
 v. : **Docket No. R-2018-2647577**
 : **Docket No. C-2018-3000773**
Columbia Gas of Pennsylvania, Inc. :

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).

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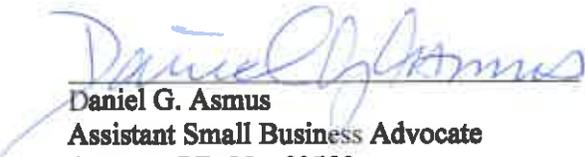
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DATE: April 17, 2018


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