

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560

FAX (717) 783-7152
consumer@paoca.org

May 25, 2018

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:

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

Copies have been served per the attached Certificate of Service.

Respectfully Submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAappleby@paoca.org

Attachment

cc: Honorable Darlene Heep, ALJ
Certificate of Service

*250232

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, 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 25th day of May 2018.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Richard A. Kanaskie, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

Brandon J. Pierce, Esquire
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

Daniel Clearfield, Esquire
Carl Shultz, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101

Sharon Webb, Esquire
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101

Charis Mincavage, Esquire
Adeolu A. Bakare, Esquire
Alessandra L. Hylander, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. #85824
E-Mail: CAappleby@paoca.org

Counsel for the Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: May 25, 2018
*250233

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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

NOTICE OF INTERVENTION
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code §§ 5.71-74, 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:

Christy M. Appleby
Assistant Consumer Advocate
Darryl A. Lawrence
Senior Assistant Consumer Advocate
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, Pa. 17101-1923
Telephone: (717) 783-5048
Fax: (717) 783-7152

Respectfully Submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org
Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

DATE: May 25, 2018
250206.docx

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 (PUC or Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file a Notice of Intervention and participate in proceedings before the Commission involving Philadelphia Gas Works' Large Customer Transportation Service Tariff at Docket No. R-2018-3000739

On March 23, 2018, Philadelphia Gas Works (PGW or Company) filed its Supplement No. 111 to Philadelphia Gas Works Gas Service Tariff – Pa. P.U.C. No. 2 (Supplement No. 111). The Company filed Supplement No. 111 pursuant to Paragraph 23 of the Company's Settlement in its base rate proceeding at Docket No. R-2017-2586783. The Settlement provided that the Company would file a new Large Customer Transportation Service Tariff (Rate LT). Supplement No. 111 proposes the creation of Rate LT for existing or new Interruptible Transportation customers. The Commission suspended the operation of the Tariff Supplement No. 111 on May 17, 2018.

The objective of the Consumer Advocate in intervening in this case is to protect the interests of consumers in PGW's service territory and to ensure that any new rates resulting from the implementation of Rate LT are just and reasonable and appropriately designed. The OCA will seek to ensure that any costs that are sought to be recovered are consistent with Commission regulations, states and applicable case law and the resultant rates are just and reasonable.