

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

 @pa_oca

 /pennoca

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

May 30, 2019

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

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

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Answer in the above-referenced proceeding. The undersigned certifies that this filing contains no averments or denials of fact subject to verification and penalties under 52 Pa. Code Section 1.36.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/Lauren M. Burge
Lauren M. Burge
Assistant Consumer Advocate
PA Attorney I.D. 311570
E-Mail: LBurge@paoca.org

Enclosures:

cc: Honorable Jeffrey A. Watson
Office of Special Assistants (e-mail only: ra-OSA@pa.gov)
Certificate of Service
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CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following documents, the Office of Consumer Advocate's Answer, 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 30th day of May 2019.

SERVICE BY E-MAIL AND INTER-OFFICE MAIL

Erika L. McLain, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120
Counsel for I&E

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

Sharon Webb, Esquire
Office of Small Business Advocate
Suite 202, Commerce Building
300 N. Second Street
Harrisburg, PA 17101
Counsel for OSBA

Theodore J. Gallagher, Esquire
Columbia Gas of Pennsylvania, Inc.
121 Champion Way, Suite 100
Canonsburg, PA 15317
Counsel for Columbia Gas of Pennsylvania, Inc.

Michael W. Hassell, Esquire
Lindsay A. Berkstresser, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101
Counsel for Columbia Gas of Pennsylvania, Inc.

Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 N. 10th Street
Harrisburg, PA 17101
Counsel for NGS Parties

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18701
Counsel for CAAP

Thomas J. Sniscak, Esquire
William E. Lehman, Esquire
Whitney E. Snyder, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
Counsel for PSU

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

Daniel Clearfield, Esquire
Kristine Marsilio, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
Counsel for Direct Energy

Alan Seltzer, Esquire
John Povilaitis, Esquire
Buchanan Ingersoll & Rooney, PC
409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
Counsel for Columbia Service Partners, Inc.

Elizabeth R. Marx, Esquire
Kadeem G. Morris, Esquire
Patrick M. Cicero, Esquire
John W. Sweet, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
Counsel for CAUSE-PA

/s/Lauren M. Burge
Lauren M. Burge
Assistant Consumer Advocate
PA Attorney I.D. #311570
E-Mail: LBurge@paoca.org

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

Counsel for:
Tanya J. McCloskey

Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
*273419

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Columbia Service Partners, Inc. :
to Amend Orders of Pennsylvania Public :
Utility Commission dated December 16, : Docket No. R-2018-2647577
2018 and January 17, 2019 at Docket No. :
R-2018-2647577 :

ANSWER OF THE
OFFICE OF CONSUMER ADVOCATE
TO THE PETITION OF
COLUMBIA SERVICE PARTNERS, INC.

Pursuant to Section 5.572 of the Pennsylvania Code, 52 Pa. Code § 5.572, the Office of Consumer Advocate (OCA) provides the following Answer to the Petition of Columbia Service Partners, Inc. to Amend Orders of the Public Utility Commission.

I. INTRODUCTION

On May 20, 2019, Columbia Service Partners, Inc. (CSP) filed a Petition to amend two Orders issued by the Pennsylvania Public Utility Commission (Commission) in Columbia Gas of Pennsylvania, Inc.’s (Columbia) base rate case at Docket No. R-2018-2647577. In its December 6, 2018 Opinion and Order in the above-captioned proceeding, the Commission found that Columbia’s current practice of providing “on bill” billing of charges for non-commodity products and services for only two of its former affiliates is discriminatory in violation of Sections 1502 and 2204 of the Public Utility Code. 66 Pa. C.S. §§ 1502, 2204; Order at 44-51. The Commission stated that Columbia must “provide such a service to all entities that provide such non-basic services or must discontinue the ‘on bill’ billing policy. In other words, Columbia must either provide such a service to all entities that provide such non-basic services or must discontinue the

‘on bill’ billing policy.” Order at 50. In its January 17, 2019 Opinion and Order Denying Reconsideration, the Commission maintained its finding and denied Petitions for Reconsideration of its December 6, 2018 Order. Pursuant to the Order, Columbia submitted a Compliance Report on March 18, 2019. The Natural Gas Supplier Parties (NGS Parties) filed Exceptions to this report on March 20, 2019 and Columbia subsequently filed a Response to those Exceptions on March 25, 2019.

Through its Petition, CSP now seeks to amend the Commission’s Orders to allow CSP to continue including charges for non-commodity products and services on Columbia’s customer bills for CSP’s existing customers until those customers terminate service, or, in the alternative, to allow CSP additional time beyond September 2019 to transition its existing customers to another billing format. See CSP Petition at ¶¶ 26-27.

II. ANSWER

The OCA submits that CSP has not provided justification for its proposed amendments to the Commission’s Orders in this proceeding and therefore the Petition should be denied. The Commission’s December 16, 2018 Order was issued over five months ago. CSP should not be allowed to add information in support of its position to the record after it has been closed for many months. CSP also has not provided adequate information regarding its contracts with existing customers, such as the length of those contracts, dates when those contracts will expire, or whether those contracts can be renewed indefinitely. CSP’s proposals lack specificity and are being proposed long after the record in this proceeding has been closed.

Further, Columbia submitted a Compliance Report on March 18, 2019 describing how it would comply with the Commission’s Orders in this proceeding. The NGS Parties filed Exceptions to this report on March 20, 2019 and Columbia subsequently filed a Response to those

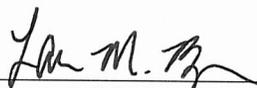
Exceptions on March 25, 2019. This Compliance Report is currently pending, and Commission has not yet ruled on whether Columbia's Compliance Report and proposed method of ending CSP's on-bill billing are acceptable.

The OCA submits that CSP has not provided sufficient information in its Petition to warrant a change to the Commission's order at this stage of the proceedings. For these reasons, the OCA submits that CPS's Petition should be denied.

III. CONCLUSION

For the foregoing reasons, the OCA submits that CSP's Petition should be denied.

Respectfully Submitted,



Lauren M. Burge
Assistant Consumer Advocate
PA Attorney I.D. #311570
E-Mail: LBurge@paoca.org

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

Counsel for:
Tanya J. McCloskey
Acting Consumer Advocate

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 30, 2019

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