



COMMONWEALTH OF PENNSYLVANIA

November 19, 2019

E-FILED

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

Re: The Hancock Telephone Company Supplement No. 70 to Tariff No. 1 / Docket No. R-2019-3013413

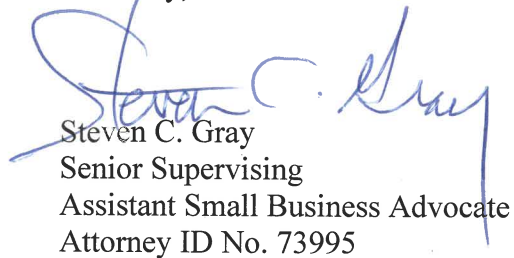
Dear Secretary Chiavetta:

Enclosed please find the Complaint, 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,


Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney ID No. 73995

Enclosures

cc: Joseph Gillan
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY
COMMISSION**

v.

HANCOCK TELEPHONE CO.

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DOCKET NO. R-2019-3013413

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**COMPLAINT OF
SMALL BUSINESS ADVOCATE**

1. The Complainant is:

John R. Evans
Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525

2. The name and address of the Complainant's attorney is:

Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525

3. The respondent utility is:

Hancock Telephone Company
34 Read Street
P.O. Box 608
Hancock, NY 13783

4. The Complainant is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. This complaint is filed against the proposed Supplement No. 70 to Telephone – PA P.U.C. No. 1 that was filed by The Hancock Telephone Company (“Hancock” or the “Company”) on October 8, 2019. According to the filing, Hancock proposes to raise business local access line rates by \$2.25.

6. Upon preliminary review of the materials filed by Hancock support of its October 8, 2019, filing, the Complainant believes, and therefore avers, that those materials may be insufficient to justify the rate adjustments, and that Hancock’s proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to Hancock’s small business customers.

7. Upon preliminary review of the materials filed by Hancock in support of its October 8, 2019, filing, the Complainant also believes, and therefore avers, that the proposed rate increases for Hancock’s business customers may be unjust, unreasonable, and in violation of 66 Pa. C.S. § 1301. Specifically, Hancock’s only basis for the proposed business local access line rate increase is to “bring Pennsylvania customer rates closer to our New York customer rates.”

8. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- a. Suspend and investigate the operation of Hancock's October 8, 2019, Tariff filing;
- b. At the conclusion of such investigation, reject the proposed tariff changes in the October 8, 2019, Tariff filing to the extent required to ensure that Hancock's rates are lawful, just, reasonable, and not unduly discriminatory to any class of customers; and
- c. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,



Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney I.D. No. 77538

For:
John R. Evans
Small Business Advocate

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

Dated: November 19, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY
COMMISSION** :

v. :

DOCKET NO. R-2019-3013413

HANCOCK TELEPHONE CO.

**PUBLIC STATEMENT OF
SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interests of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). The Act further provides that the Small Business Advocate issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by the 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 a Complaint against proposed Supplement No. 70 to Tariff Telephone – PA P.U.C. No. 1 (“Supplement No. 70”) of The Hancock Telephone Company (“Hancock”) that was filed with the Commission on October 8, 2019.

Hancock’s proposed Supplement No. 70 would to raise business local access line rates by \$2.25. Hancock’s only basis for the proposed business local access line rate increase is to “bring Pennsylvania customer rates closer to our New York customer rates.” Hancock’s proposed business rate increase appears to violate Pennsylvania Law that requires all rates be just and reasonable.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Commission to investigate the reasonableness of the proposed rates in Supplement

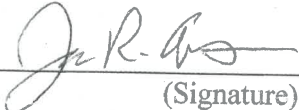
No. 70. The Small Business Advocate will ask the Commission to deny any rate increase to Hancock's small business customers that are not proven by Hancock to be lawful, just, reasonable and non-discriminatory.

Dated: November 19, 2019

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: 11/19/19



(Signature)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

DOCKET NO. R-2019-3013413

HANCOCK TELEPHONE CO.

CERTIFICATE OF SERVICE

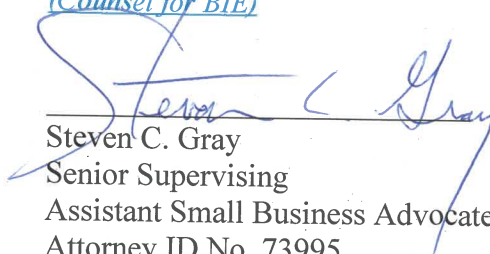
I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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

Tanya J. McCloskey, Esquire
Acting Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
tmccloskey@paoca.org
(Counsel for OCA)

Richard Kanaskie, Esquire
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
rkanaskie@pa.gov
(Counsel for BIE)

DATE: November 19, 2019


Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney ID No. 73995