



COMMONWEALTH OF PENNSYLVANIA

March 19, 2020

E-FILED

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

Re: Petition for Expedited Approval of PGW's Letter to Request to Amend its Universal Service and Energy Conservation Plan Pursuant to 2019 Amendments to Policy Statement / Docket No. P-2020-3018867

Dear Secretary Chiavetta:

Enclosed please find the 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 "Sharon E. Webb".

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

Enclosures

cc: Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition for Expedited Approval of Philadelphia :
Gas Works' Letter to Amend its Universal :
Service and Energy Conservation Plan Pursuant : **Docket No. M-2019-3012599**
To 2019 Amendments to Policy Statement : **Docket No. P-2020-3018867**
:

**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 Philadelphia Gas Works Letter Request to Amend its Universal Service and Energy Conservation Plan Pursuant to 2019 Amendments to Policy Statement at Docket No. M-2019-3012559. 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
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, Pennsylvania 17101
(717) 783-2525
(717) 783-2831 (fax)
swebb@pa.gov

Respectfully submitted,



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

For:
John R. Evans
Small Business Advocate

Office of Small Business Advocate
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(717) 783-2525
(717) 783-2831 (fax)

Date: March 19, 2020

**OBEOFRE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition for Expedited Approval of Philadelphia :
Gas Works' Letter to Amend its Universal :
Service and Energy Conservation Plan Pursuant : **Docket No. M-2019-3012599**
To 2019 Amendments to Policy Statement : **Docket No. P-2020-3018867**
:

**PUBLIC STATEMENT OF
THE 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, 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 setting forth 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 Pennsylvania 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 Notice of Intervention and an Answer in the above-captioned proceeding.

This proceeding involves a request by Philadelphia Gas Works (“PGW” or the “Company”) to amend two of its universal service and energy conservation programs for low income residential customers, specifically the Customer Assistance Program (“CAP”) Customer Responsibility Program (“CRP”). PGW has requested expedited approval of the proposed changes in order to implement a pilot program as part of the implementation of its customer information system (“CIS”) replacement project. Although only residential customers can participate in PGW’s CRP and CAP programs,

business customers pay a portion of the costs of the PGW's universal service programs.

The Commission's decision in the above-captioned proceeding will affect the rates of small business customers. Therefore, the Small Business Advocate will participate in the instant proceeding before the Commission to protect the interests of PGW's small business customers.

Dated: March 19, 2020

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: 03/19/2020



(Signature)

Petition for Expedited Approval of PGW's :
Letter to Request to Amend its Universal :
Service and Energy Conservation Plan : **P-2020-3018867**
Pursuant to 2019 Amendments to Policy : **M-2019-3012599**
Statement :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*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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The Honorable Charles E. Rainey Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
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DATE: March 19, 2020



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