



COMMONWEALTH OF PENNSYLVANIA

May 4, 2020

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. 2020
Base Rate Filing / Docket No. R-2020-3018835**

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,

/s/ Daniel G. Asmus

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

Enclosures

cc: Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2020-3018835
	:	
Columbia Gas of Pennsylvania, Inc.	:	

**COMPLAINT OF THE
SMALL BUSINESS ADVOCATE**

1. The Complainant is:

John R. Evans
Small Business Advocate
Forum Place
555 Walnut St., 1st Floor
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

2. The name and address of the Complainant's attorneys are:

Daniel G. Asmus, Esquire
Assistant Small Business Advocate
Steven C. Gray
Senior Supervising Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
5655 Walnut St., 1st Floor
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
dasmus@pa.gov
sgray@pa.gov

3. The respondent utility is:

Columbia Gas of Pennsylvania, Inc.
121 Champion Way, Suite 100
Canonsburg, PA 15317

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 rates, terms and other provisions of Supplement No. 307 to Tariff Gas Pa. P.U.C. No. 9 (“Supplement No. 307”), which was filed on April 24, 2020, by Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”). The proposed Tariff, if approved by the Commission, would increase the Company’s distribution rates by \$100.4 million per year. After preliminary review of the materials filed by the Company in support of the proposed Supplement No. 307, Complainant believes, and therefore avers, that those materials may be insufficient to justify the rate increase requested and that the Company’s present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to small business customers.

6. Complainant believes, and therefore avers, that Columbia’s proposed rates, rate design, and cost and revenue allocation are or may be unjust, unreasonable, and unlawfully discriminatory in violation of, inter alia, Sections 1301 and 1304 of the Public Utility Code, 66 Pa.C.S. §§1301 and 1304, and contrary to appropriate public policy and sound ratemaking considerations, and may not be supported by the materials filed by the Company.

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

- a. Suspend and investigate the operation of Supplement No. 307;
- b. At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Supplement No. 307 to the extent required to ensure that Columbia's rates are lawful, just, reasonable and not unduly discriminatory; and
- c. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

/s/ Daniel G. Asmus

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

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

Dated: May 4, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2020-3018835
	:	
Columbia Gas of Pennsylvania, Inc.	:	

**PUBLIC STATEMENT OF
OFFICE 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. 307 to Tariff - Gas – Pa. P.U.C. No. 9 (“Supplement No. 307”) of Columbia Gas of Pennsylvania, Inc. (“Columbia”).

Columbia’s proposed Supplement No. 307 would increase by \$100.4 million the amount of base rate revenues collected from all customers, including small business customers.

The Small Business Advocate is filing a formal Complaint against Columbia’s proposed rate increase in order to protect the interests of Columbia’s small business

customers. A thorough inquiry by the Commission into all elements of Columbia's request for a rate increase is necessary to ensure that Columbia's rates, including any new rates that may result from this proceeding, are just and reasonable.

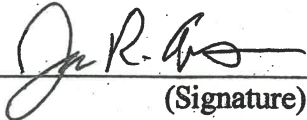
In view of the foregoing, the Small Business Advocate will participate in proceedings before the Commission to investigate the reasonableness of the rates in Columbia's proposed Supplement No. 307. The Small Business Advocate will ask the Commission to deny any proposed rate increase or other changes in Columbia's present tariffs that apply to small business customers that are not proven by Columbia to be lawful, just, reasonable and non-discriminatory.

Dated: May 4, 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: 05/04/20



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
: **Docket No. R-2020-3018835**
v. :
: **Columbia Gas of Pennsylvania, Inc.** :

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).

The Honorable Charles E. Rainey Jr.
Chief Administrative Law Judge
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121 Champion Way, Suite 100
Canonsburg, PA 15317
mbmoore@nisource.com

/s/ Daniel G. Asmus

DATE: May 4, 2020

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