

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA'S
PETITION TO INTERVENE**

NOW COMES, the Community Action Association of Pennsylvania (CAAP), by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter, averring as follows:

1. The Petitioner, Community Action Association of Pennsylvania, is a statewide association representing Pennsylvania's community action agencies that provide anti-poverty planning and community development activities for low-income communities and services to individuals and families.

2. For more than 30 years, one of CAAP's primary missions has been to represent the energy interests of low-income citizens in proceedings before the Pennsylvania Public Utility Commission and as such, CAAP has a direct and substantial interest in this proceeding that cannot be adequately represented by any other party.

3. CAAP is comprised of forty-one member agencies including agencies in the Columbia Gas of Pennsylvania's service areas. Specifically, the agencies listed in Exhibit A attached are members of CAAP and customers of Columbia Gas.

4. CAAP seeks permission to intervene in Columbia Gas of Pennsylvania, Inc.'s request for a general rate increase pursuant to the above-captioned docket number.

5. CAAP has intervened and has been granted intervention and active party status in prior rate and/or acquisition cases before the Pennsylvania Public Utility Commission. CAAP

was granted intervenor status in prior rate cases filed by Columbia Gas of Pennsylvania, Inc. (Docket No. R-2008-2011621, Docket No. R-2012-2321748, Docket No. R-2016-2529660 and Docket No. R-2018-2647577).

6. CAAP seeks permission to intervene in Columbia Gas of Pennsylvania, Inc.'s request for a general rate increase to examine the effect of the proposed rate increase on their customers, particularly low-income customers.

7. CAAP is also intervening to investigate whether the Company's universal service programs are appropriately funded and available and if those programs will be appropriately funded and available if the proposed rate increase is granted.

8. CAAP's participation as an active party in this proceeding is required to protect its substantial interests and the substantial interests of the low-income citizens it represents in ensuring that utility rates remain affordable to its clients. Accordingly, CAAP's participation in this proceeding will serve the public interest.

9. Because CAAP represents low-income citizens in the Company's service areas, the interests of its clients are not protected by any other party to this action.

POSITIONS

10. CAAP takes no position at this time regarding the Company's request for rate increase but CAAP's participation in this proceeding is, in part, to study the effect of the proposed rate increase and structure on the Company's low-income customers and whether the Company's universal service programs will be appropriately funded and available.

11. There is a substantial public interest in ensuring that the Company's universal service programs are appropriately funded and available and the effect, if any, on those programs if the proposed rate increase is approved.

REQUEST FOR RELIEF

WHEREFORE, CAAP respectfully requests that the Commission:

1. Receive for filing and docket this Petition to Intervene and order that CAAP be an active party to such proceedings and be placed on all services lists.

2. Order that the following individuals be designated as CAAP's recipients for service:

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
Phone: (570) 288-6441
Fax: (570) 288-4598
e-mail: jlvullo@bvrrlaw.com
Counsel for CAAP

3. Order that each party to the proceedings provide CAAP's designated recipient with copies of all papers filed.

4. Order that public hearings be conducted in Columbia Gas of Pennsylvania, Inc.'s service territories.

5. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,



JOSEPH L. VULLO, ESQUIRE
I.D. No. 41279
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@bvrrlaw.com
Attorney for Community Action Association
of Pennsylvania

EXHIBIT A

COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA MEMBER AGENCIES

South Central Community Action Program, Inc.
Center for Community Action
Central Pennsylvania Community Action, Inc.
Indiana County Community Action Program, Inc.
Community Action Partnership of Mercer County, Inc.
Community Action Partnership for Somerset County – Tableland Services
Warren/Forest Counties Economic Opportunity Council
Northern Tier Community Action Corporation
Community Support Services of Venango & Crawford Counties
Lawrence County Community Action Partnership
Butler County Community Action & Development
Armstrong County Community Action Agency
Community Services Program of Beaver County
Allegheny County Department of Human Services
Pittsburgh Community Services, Inc.
Westmoreland Community Action
Blue Prints
Fayette County Community Action Agency, Inc.
Community Progress Council
Chester County Department of Community Development
PathStones Corporation

VERIFICATION

I, SUSAN A. MOORE, Executive Director of Community Action Association of Pennsylvania, hereby verify that I am authorized to execute this Verification and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information and belief.

COMMUNITY ACTION ASSOCIATION
OF PENNSYLVANIA

BY: 

SUSAN A. MOORE, Executive Director

Dated: 5/13/2020

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CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Community Action Association of Pennsylvania’s Petition to Intervene upon the following participants this 14th day of May, 2020, via electronic mail:

The Honorable Charles E. Rainey, Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Buildings
Harrisburg, PA 17120
crainey@pa.gov

Daniel G. Asmus
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
dasmus@pa.gov

Erika L. McLain, Esquire
PA Public Utility Commission
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
ermclain@pa.gov

Tanya J. McCloskey, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor – Forum Place
Harrisburg, PA 17101
tmccloskey@paoca.org

Michael W. Hassell, Esquire
Post & Schell, PC
12th Floor
17 North 2nd Street
Harrisburg, PA 17101-1601
mhassell@postschell.com

Amy E. Hirakis, Esquire
NiSource Corporate Services Company
800 North 3rd Street, Suite 204
Harrisburg, PA 17102
ahirakis@nisource.com

Meagan B. Moore, Esquire
NiSource Corporate Services Company
121 Champion Way, Suite 100
Canonsburg, PA 15317
mbmoore@nisource.com



JOSEPH L. VULLO, ESQUIRE
I.D. No. 41279
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@aol.com
Attorney for Community Action Association
of Pennsylvania