



June 2, 2020

**VIA Email**

The Honorable Katrina Dunderdale  
Administrative Law Judge  
Piatt Place, Suite 220  
301 Fifth Avenue  
Pittsburgh, PA 15222  
[kdunderdal@pa.gov](mailto:kdunderdal@pa.gov)

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

*CAUSE-PA Letter in Lieu of Answer in Support of I&E's Expedited Motion*

Dear Judge Dunderdale:

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) files this Letter in lieu of an Answer to the Expedited Motion of the Bureau of Investigation and Enforcement (I&E) to Extend the Statutory Suspension Period During the Emergency Interruption of Normal Operations of the Pennsylvania Public Utility Commission, filed May 29, 2020, at the above referenced docket. In support thereof, CAUSE-PA asserts as follows:

CAUSE-PA agrees with I&E's requested extension of the procedural schedule and suspension date and its arguments in support thereof. Like I&E, all offices of counsel for CAUSE-PA, the Pennsylvania Utility Law Project, are closed. CAUSE-PA shares the concerns of I&E that it will be difficult to investigate and analyze the requested base rate increase within the statutory timeframe. These challenges may present insurmountable logistical issues that will necessarily impact the ability of CAUSE-PA and its counsel to protect the rights of its members and the vulnerable low and moderate income consumers that CAUSE-PA seeks to protect through intervention in this proceeding.

CAUSE-PA also shares I&E's concerns that the current schedule may overlap with procedural schedules in the four other active rate cases in which CAUSE-PA's counsel also represents intervening parties.<sup>1</sup> CAUSE-PA has very limited resources and a limited pool of witnesses with the technical expertise to enter testimony in such proceedings. I&E's requested extension will help ensure that CAUSE-PA's witness, Mitchell Miller, will be able to conduct a proper review of Columbia's filing and that he will not be required to prepare for multiple hearings on different cases in a short period of time.

CAUSE-PA further notes that its ability to fully participate in this proceeding is critically important to protect the rights of its low income members, who are impacted most profoundly by the health and economic impacts of the pandemic. Unemployment rates have already far surpassed anything we have experienced in modern history, and continue to grow exponentially each week. With supplemental unemployment and other stimulus benefits set to expire in July, the level of economic devastation and poverty created by the pandemic will continue to grow. Thus, a robust examination of Columbia's request to increase rates – and the ability of its low-income programs and policies to provide universally accessible services in light of the rate increase – is particularly important under these circumstances.

Finally, CAUSE-PA shares I&E's concerns that the current schedule does not provide ample time to schedule public input hearings and provide the public with adequate notice to register and participate. Due to restrictions at the Pennsylvania Public Utility Commission, all public input hearings are being held either electronically or telephonically and require advanced registration from any member of the public who wishes to testify or even listen to the hearing. This change, in and of itself, could potentially have a chilling effect on the public's ability to attend and/or testify at the hearing. It is vital that the public be given ample notice so they have the ability to be heard.

Due to the current economic landscape, it is essential that the public have an opportunity to be heard about the impact that the rate increase will have on their lives. This is particularly important for low-income households who already struggle to pay their bills each month, even in the best of times. We are in the midst of one of the greatest crises in modern history, and low-income and minority communities have been particularly hard hit. It is thus crucial that the Commission protect the due process rights of these vulnerable households and ensure that they have the opportunity to be heard before any decision is made as to any change in rates.

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<sup>1</sup> CAUSE-PA has intervened in rate cases for UGI Utilities, Inc.; Philadelphia Gas Works, and Pennsylvania American Water. CAUSE-PA's counsel, the Pennsylvania Utility Law Project, also represents Pittsburgh United in the ongoing rate case for Pittsburgh Water and Sewer Authority.

For these reasons, CAUSE-PA supports I&E's motion to extend the procedural schedule. Approval of this motion will allow the parties to conduct a more thorough review of the case, will prevent the overextension of expert witnesses, and will protect the due process rights of vulnerable consumers by ensuring that they have a meaningful opportunity to be heard.

Thank you for your time and consideration. A copy of this letter had been served on all parties. Pursuant to the Commission's Emergency Order issued on March 20, 2020, and as indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

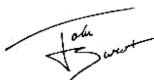
A handwritten signature in black ink, appearing to read "John W. Sweet". The signature is written in a cursive style with a horizontal line above the name.

John W. Sweet, Esq.  
*Counsel for CAUSE-PA*

CC: Secretary Rosemary Chiavetta (Via E-File)  
Chief Administrative Law Judge Charles Rainey (Via Email: [crainey@pa.gov](mailto:crainey@pa.gov))  
Dan Pallas (Via Email: [dpallas@pa.gov](mailto:dpallas@pa.gov))  
Certificate of Service

**Verification**

I, **John W. Sweet, Esq.**, legal counsel for the Coalition for Affordable Utility Services and Energy Efficiency (“CAUSE-PA”), on behalf of CAUSE-PA, hereby state that the facts contained in the foregoing pleadings are true and correct to the best of my knowledge, information, and belief, that I am duly authorized to make this Verification, 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 10 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



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John W. Sweet, Esq.  
On behalf of the Coalition for Affordable Utility Services  
and Energy Efficiency in Pennsylvania (CAUSE-PA)

June 2, 2020

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**Certificate of Service**

I hereby certify that I have this day served copies of the **Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) Letter in Lieu of Answer in Support of the Expedited Motion of the Bureau of Investigation and Enforcement (BIE) to Extend the Statutory Suspension Period During the Emergency Interruption of Normal Operations of the Pennsylvania Public Utility Commission** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 and consistent with the Commission’s March 20 Emergency Order at Docket M-2020-3019262.

**VIA Email**

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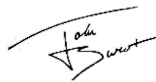
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Respectfully Submitted,  
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**June 2, 2020**