


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560

 @pa_oca

 /pennoca

FAX (717) 783-7152
consumer@paoca.org

September 22, 2020

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

Re: Peoples Natural Gas Company LLC
Universal Service and Energy Conservation
Plan for 2019-2024
Docket No. M-2018-3003177

Peoples Gas Company LLC
Universal Service and Energy Conservation
Plan for 2019-2024
Docket No. M-2020-3021343

Petition of Peoples Natural Gas Company
LLC –to Modify the Budget for the
Equitable Division
Docket No. P-2019-3007044

Amendment to Peoples Natural Gas
Company LLC Universal Service and
Energy Conservation Plan for 2015-2018
Docket No. P-2020-3017641

Peoples Natural Gas Company LLC
Universal Service and Energy Conservation
Plan for 2015-2018
Docket No. M-20142432515

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceedings.

Rosemary Chiavetta, Secretary
September 22, 2020
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Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAappleby@paoca.org

Enclosures:

cc: Office of Administrative Law Judge (**email only**)
Office of Special Assistants (**email only**: ra-OSA@pa.gov)
Bureau of Technical Utility Services (**email only**)
Jennifer Johnson, Bureau of Consumer Services (**email only**)
Louise Fink Smith, Law Bureau (**email only**)
Certificate of Service

*296537

CERTIFICATE OF SERVICE

Re: Peoples Natural Gas Company LLC :
Universal Service and Energy Conservation : Docket No. M-2018-3003177
Plan for 2019-2024 :
:
Peoples Gas Company LLC :
Universal Service and Energy Conservation : Docket No. M-2020-3021343
Plan for 2019-2024 :
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Petition of Peoples Natural Gas Company :
LLC –to Modify the Budget for the : Docket No. P-2019-3007044
Equitable Division :
:
Amendment to Peoples Natural Gas :
Company LLC Universal Service and : Docket No. P-2020-3017641
Energy Conservation Plan for 2015-2018 :
:
Peoples Natural Gas Company LLC :
Universal Service and Energy Conservation : Docket No. M-20142432515
Plan for 2015-2018 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 22nd day of September 2020.

SERVICE BY E-MAIL ONLY

Richard A. Kanaskie, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

John R. Evans, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923

Elizabeth R. Marx, Esquire
PA Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Jennifer Petrisek, Esquire
Peoples Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAAppleby@paoca.org

Counsel for:
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: September 22, 2020
*296540

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Peoples Natural Gas Company LLC	:	
Universal Service and Energy Conservation	:	Docket No. M-2018-3003177
Plan for 2019-2024	:	
	:	
Peoples Gas Company LLC	:	
Universal Service and Energy Conservation	:	Docket No. M-2020-3021343
Plan for 2019-2024	:	
	:	
Petition of Peoples Natural Gas Company	:	
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Equitable Division	:	
	:	
Amendment to Peoples Natural Gas	:	
Company LLC Universal Service and	:	Docket No. P-2020-3017641
Energy Conservation Plan for 2015-2018	:	
	:	
Peoples Natural Gas Company LLC	:	
Universal Service and Energy Conservation	:	Docket No. M-20142432515
Plan for 2015-2018	:	

NOTICE OF INTERVENTION
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code § 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Christy M. Appleby
Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152

Respectfully Submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org

DATED: September 22, 2020
*296550

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. § 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file a Notice of Intervention and Answer, and to participate in proceedings before the Commission involving the Universal Service and Energy Conservation Plans for Peoples Natural Gas Company and Peoples Gas Company (collectively Peoples or Companies).

On July 2, 2018, the Companies filed their proposed Universal Service and Energy Conservation Plan for 2019-2021 (USECP). By Commission Order, the USECP was subsequently extended until 2024. On January 6, 2020, the Companies also proposed to modify their USECP to make changes, including to the energy burdens, in response to the Commission's *Final CAP Policy Statement and Order* at Docket No. M-2019-3012599. The Companies also proposed in an April 24, 2020 filing further modifications to the Customer Assistance Program (CAP), Emergency Furnace and Service Line Repair (EFSLR) program, Hardship Fund budgets and Hardship Fund enrollment projections. On August 17, 2020, the Commission issued its Tentative Order regarding the Companies' Universal Service and Energy Conservation Plans and proposed amendments to the Universal Service and Energy Conservation Plans.

The objective of the Acting Consumer Advocate in intervening in this case is to protect the interests of consumers in the Peoples' service territories. The OCA seeks to ensure that the universal service programs are reasonable and appropriately designed. The OCA will also seek to ensure that the costs that are sought to be recovered are consistent with the Commission regulations, statutes and applicable case law and result in rates that are just and reasonable.