



COMMONWEALTH OF PENNSYLVANIA

July 22, 2022

E-FILED

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

**Re: Pennsylvania Public Utility Commission v. Leatherstocking Gas Company, LLC
/ Docket No.: R-2022-3032764**

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/ Sharon E. Webb

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

Enclosures

cc: Parties of Record

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. 17 to Leatherstocking Gas Company LLC’s Gas Service Tariff –Pa. P.U.C. No. 1 (“Supplement No. 17”), which was filed on July 1, 2022. The proposed Tariff, if approved by the Commission, would increase the retail distribution rates of (“Leatherstocking” or the “Company”) by \$701,000. After preliminary review of the materials filed by the Company in support of the proposed Tariff, 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 Leatherstocking’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 Leatherstocking.

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. 17 to Leatherstocking's Gas Service Tariff –Pa. P.U.C. No. 1;
- B. At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Supplement No. 17 to Leatherstocking's Gas Service Tariff –Pa. P.U.C. No. 17 to the extent required to insure that Leatherstocking'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/ Sharon E. Webb

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

For: NazAarah Sabree
Small Business Advocate

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Dated: July 22, 2022

the Company in support of its request for a rate increase indicates that the costs claimed by the utility for ratemaking purposes may be excessive. A thorough inquiry by the Commission into all elements of Leatherstocking's request for a rate increase is necessary to ensure that Leatherstocking's rates, including any new rates that may result from this proceeding, are just, reasonable, and non-discriminatory.


In view of the foregoing, the Small Business Advocate will participate in proceedings before the Commission to investigate the reasonableness of the proposed rates in Leatherstocking's Tariff No. 1 ("Supplement No. 17"). The Small Business Advocate will ask the Commission to deny any proposed rate increase or other changes in Leatherstocking's present tariffs that apply to small business customers that are not proven by the Company to be lawful, just, reasonable and non-discriminatory.

Dated: July 22, 2022

VERIFICATION

I, NazAarah Sabree, 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: July 22, 2022



(Signature)

