



COMMONWEALTH OF PENNSYLVANIA

January 12, 2023

**E-FILED**

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

**Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works /  
Docket No: (R-2022-3036472)**

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum, 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.

*Enclosures*

cc: Robert D. Knecht  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission** :  
 :  
 v. : **Docket No. R-2022-3036472**  
 :  
**Philadelphia Gas Works** :

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**OFFICE OF SMALL BUSINESS ADVOCATE  
PREHEARING MEMORANDUM**

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**I. INTRODUCTION**

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Representing the OSBA in this matter is Assistant Small Business Advocate Sharon E. Webb. Please address all correspondence as follows:

Sharon E. Webb  
Assistant Small Business Advocates  
Office of Small Business Advocate  
555 Walnut Street, 1<sup>st</sup> Floor  
Forum Place  
Harrisburg, Pennsylvania 17101  
(717) 783-2525  
(717) 783-2831 (fax)  
[swebb@pa.gov](mailto:swebb@pa.gov)

## **II. FILING BACKGROUND**

Philadelphia Gas Works (“PGW”) filed Tariff Gas Pa. P.U.C. No 2, Supplement No. 156 on November 1, 2022, to modify the expiration date on which PGW’s Rate GTS-F would terminate, and temporarily extend the termination date pending a decision by the Commission in the complaint proceeding at Docket No. C-2021-3029259, or April 30, 2023, whichever occurs first.

On November 11, 2022, Vicinity Energy of Philadelphia, Inc. (“VEPI”) and Grays Ferry Cogeneration Partnership, LLC (“Grays Ferry”) (collectively “Vicinity”) filed complaints, Docketed at C-2022-3036774, and C-2022-3036783, against PGW’s November 1<sup>st</sup> Tariff filing. Subsequently, on January 9, 2023, Vicinity filed a Joint Petition for Leave to Withdraw the Complaints.

The OSBA filed a Notice of Intervention on January 11, 2022.

## **III. IDENTIFICATION OF WITNESSES**

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mr. Robert D. Knecht  
Industrial Economics Incorporated  
5 Plymouth Road  
Lexington, MA 02421  
(781) 249 9461  
[rdk@indecon.com](mailto:rdk@indecon.com)

The OSBA requests that all parties provide courtesy copies of all documents, including discovery, testimony and briefs, to Mr. Knecht, simultaneously with service upon the OSBA.

#### **IV. IDENTIFICATION OF ISSUES**

The OSBA is participating in the case to assure that the interests of small business customers of PGW are adequately represented and protected.

#### **IV. SERVICE OF DOCUMENTS**

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date<sup>a</sup> as satisfying the in-hand requirement. The OSBA requests that email delivery of documents also be provided to its witnesses identified above.

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

#### **V. SETTLEMENT**

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

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<sup>a</sup> In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

**VI. HEARING AND BRIEFING SCHEDULE**

The OSBA will cooperate with the other parties to develop a procedural schedule.

Respectfully submitted,

/s/ Sharon E. Webb

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

For:  
Office of Small Business Advocate

Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

Dated: January 12, 2023

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission**

v.

**Philadelphia Gas Works**

:  
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: **Docket No. R-2022-3036472**  
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**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).

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Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
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DATE: January 12, 2023

/s/ Sharon E. Webb

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Assistant Small Business Advocate  
Attorney ID No. 73995