

COMMONWEALTH OF PENNSYLVANIA



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Consumer Advocate

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June 29, 2023

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

Re: Columbia Gas of Pennsylvania, Inc. Universal  
Service and Energy Conservation Plan for  
2024-2028 Submitted in Compliance with  
52 Pa. Code § 62.4  
Docket No. M-2023-3039487

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 proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby  
Christy M. Appleby  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
CAppleby@paoca.org

Enclosures:

cc: The Honorable Charles E. Rainey, Jr. (**email only:** [crainey@pa.gov](mailto:crainey@pa.gov))  
Bureau of Technical Utility Services (**email only:** [pdiskin@pa.gov](mailto:pdiskin@pa.gov))  
Office of Special Assistants (**email only:** [ra-OSA@pa.gov](mailto:ra-OSA@pa.gov))  
Norma Bowman, BCS (**email only:** [nobowman@pa.gov](mailto:nobowman@pa.gov))  
Christina Chase-Pettis, Office of Communications (**email only:** [cchasepett@pa.gov](mailto:cchasepett@pa.gov))  
Stephanie Wilson, Law Bureau (**email only:** [stephwilson@pa.gov](mailto:stephwilson@pa.gov))  
Louise Fink Smith, Law Bureau (**email only:** [finksmith@pa.gov](mailto:finksmith@pa.gov))  
Certificate of Service

\*348507

CERTIFICATE OF SERVICE

Columbia Gas of Pennsylvania, Inc. Universal :  
Service and Energy Conservation Plan for : Docket No. M-2023-3039487  
2024-2028 Submitted in Compliance with :  
52 Pa. Code § 62.4 :

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 29<sup>th</sup> day of June 2023.

**SERVICE BY E-MAIL ONLY**

Richard A. Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
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*Counsel for Columbia Gas of PA, Inc.*

/s/ Christy M. Appleby  
Christy M. Appleby  
Senior Assistant Consumer Advocate  
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Harrison W. Breitman  
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Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Dated: June 29, 2023  
\*348505

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Columbia Gas of Pennsylvania, Inc. :  
Universal Service and Energy Conservation Plan : Docket No. M-2023-3039487  
For 2024-2028 Submitted in Complaint with :  
52 Pa. Code § 62.4 :

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NOTICE OF INTERVENTION  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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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  
Senior Assistant Consumer Advocate  
Harrison W. Breitman  
Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> 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: [CAappleby@paoca.org](mailto:CAappleby@paoca.org)

DATED: June 29, 2023

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 Consumer Advocate determined to file a Notice of Intervention, and to participate in proceedings before the Commission involving the Universal Service and Energy Conservation Plan for Columbia Gas of Pennsylvania, Inc. (Columbia or Company)

On April 5, 2023, Columbia filed its proposed Universal Service and Energy Conservation Plan for 2024-2028 (USECP or Plan). In its proposed USECP, Columbia proposes changes to its Plan, including changes to the energy burdens, in order to implement some of the changes identified in the Commission's revised CAP Policy Statement. The Company also proposes updates to its payment plan options; to change the requirements for identity verification to the ratepayer only; to eliminate the process of aggregate shopping of natural gas supplied to all CAP customers, due to the lack of interest from natural gas suppliers; and to eliminate the Remedial Energy Efficiency Program. On June 15, 2023, the Commission issued its Order Directing Supplemental Information and Establishing Comment Period.

The objective of the Consumer Advocate in intervening in this case is to protect the interests of consumers in Columbia's service territory. The OCA seeks to ensure that the universal service programs are reasonable and appropriately designed and funded. 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.