



COMMONWEALTH OF PENNSYLVANIA

March 27, 2024

E-FILED

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

**Re: Pennsylvania Public Utility Commission v. Columbia Gas Company 1307(f) / Docket
No. R-2024-3046519**

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/ Steven C. Gray

Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission : **Docket No. R-2024-3046519**
:
v. :
Columbia Gas of Pennsylvania, Inc. :

**COMPLAINT OF THE
SMALL BUSINESS ADVOCATE**

1. The Complainant is:

NazAarah Sabree
Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525

2. The name and address of the Complainant's attorneys are:

Steven C. Gray
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
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(717) 783-2525
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3. The respondent utility is:

Columbia Gas of Pennsylvania Inc.
800 N. Third Street
Suite 204
Harrisburg, PA 17102

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. On March 15, 2024, Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”) filed Supplement No. 373 to its Tariff Gas – Pa. P.U.C. No. 9 (“Supplement 373”) with the Pennsylvania Public Utility Commission (“Commission”). If approved by the Commission, Columbia’s overall annual revenue would increase by approximately \$124.1 million. In addition, Columbia proposes to alter its Weather Normalization Adjustment methodology to the detriment of the Company’s ratepayers. Furthermore, Columbia proposes a Municipal Levelization Charge which purports to alter bills throughout the Company’s service territory. According to the March 15th filing, Supplement 373 would increase small business rates by over 13%.

6. After preliminary review of the materials filed by the Company in support of the Supplement 373, Complainant believes, and therefore avers, that those materials may be insufficient to justify the rate increase requested and that the Columbia’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 Columbia’s small business customers.

7. Complainant believes, and therefore avers, that Columbia’s proposed tariff changes, proposed rates, rate design, 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, furthermore, are contrary to appropriate public policy, sound ratemaking considerations, and may not be supported by the materials filed by Columbia.

8. The OSBA also files this Complaint to ensure that the Company will provide a formal payment assistance plan for its small business customers.

9. 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 373;
- b. At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Supplement 373 to the extent required to make certain that Columbia's rates are lawful, just, reasonable, and not unduly discriminatory to small business customers; and
- c. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

/s/ Steven C. Gray

Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525

Dated: March 27, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission : **Docket No. R-2024-3046519**
:
v. :
Columbia Gas of Pennsylvania, Inc. :

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission (“Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a complaint against the proposed base rate tariff filing of the Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”), which would increase the annual operating revenue of Columbia by approximately \$124.1 million per year, make significant changes to the Company’s Weather Normalization Adjustment methodology, add a so-called Municipal Levelization Charge, and increase small business rates by over 13 percent.

The Small Business Advocate files this formal complaint against the Company’s proposed base rate tariff filing to protect the interests of Columbia’s small business customers. A thorough inquiry by the Commission into all elements of the Company’s proposed tariff filing

is necessary to ensure that the tariff filing is lawful, just, reasonable, and not discriminatory to Columbia's small business customers.

In view of the foregoing, the Small Business Advocate will participate in this proceeding before the Public Utility Commission to investigate the reasonableness of the proposed base rate tariff filing. The Small Business Advocate will ask the Commission to deny any proposed new rates and other tariff changes that apply to small business customers that are not proven by Columbia to be lawful, just, reasonable, and not discriminatory to the Company's small business customers.

Dated: March 27, 2024

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: March 27, 2024



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission : **Docket No. R-2024-3046519**
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Columbia Gas of Pennsylvania, Inc. :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey Jr.
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DATE: March 27, 2024

/s/ Steven C. Gray

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