

COMMONWEALTH OF PENNSYLVANIA



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April 4, 2025

Via Electronic Filing

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-2025-3053112

Dear Secretary Chiavetta:

Attached for electronic filing, please find enclosed a copy of the Prehearing Conference Memorandum submitted on behalf of the Office of Consumer Advocate in this proceeding.

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

Respectfully submitted,

/s/ Ryan Morden
Ryan Morden, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 335679
RMorden@paoca.org

Enclosures

cc: The Honorable Eranda Vero (email only: evero@pa.gov)
Parties of Record (per Certificate of Service)

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3053112
	:	
Philadelphia Gas Works	:	
	:	

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Prehearing Conference Memorandum, 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 4th day of April, 2025.

SERVICE BY E-MAIL ONLY

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Counsel for:
Darryl A. Lawrence
Acting Consumer Advocate

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	Docket Nos. R-2025-3053112
v.	:	
	:	
Philadelphia Gas Works	:	

PREHEARING CONFERENCE MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to the Prehearing Conference Order issued on March 28, 2025, in the above-captioned proceeding, by the Honorable Administrative Law Judge (ALJ) Eranda Vero of the Office of Administrative Law Judge (OALJ) of the Pennsylvania Public Utility Commission (Commission), and pursuant to Section 333 of the Public Utility Code (Code), 66 Pa. C.S. Section 333 and the Commission’s regulations at 52 Pa. Code Sections 5.221-5.224, the Pennsylvania Office of Consumer Advocate (OCA) submits the following Prehearing Conference Memorandum.

I. INTRODUCTION AND PROCEDURAL HISTORY

On February 27, 2025, Philadelphia Gas Works (PGW or the Company) filed proposed Supplement No. 176 to PGW’s Gas Service Tariff – Pa P.U.C. No. 2 (Supplement No. 176) and Proposed Supplier Tariff Supplement No. 119 to Gas - Pa. P.U.C. No. 1 (Supplement No. 119) with the Commission. The Company proposes to increase rates to produce additional overall revenues of \$105 million per year, a 15.73% increase in overall distribution revenue requirement.

PGW provides natural gas distribution service to approximately 514,600 residential, commercial, and industrial customers in the City of Philadelphia, Pennsylvania.

Under the Company's proposal, the total bill for a residential customer using an average of 61 thousand cubic feet (MCF) per year would increase from \$92.60 to \$104.61 per month or by 13%. The Company is proposing to increase the average residential monthly customer charge, which is a charge a customer pays no matter how little or how much natural gas they consume, by \$3.25, or by 20%, from \$16.25 to \$19.50. The Company is also proposing to implement a new decoupling alternative ratemaking mechanism called the Revenue Normalization Adjustment (RNA), which the Company intends to use to recover the Company's revenue separate from the volume of gas it sells. In addition to the proposed RNA decoupling mechanism, the OCA will also address and investigate the justness and reasonableness of PGW's current and proposed decoupling mechanism called the Weather Normalization Adjustment (WNA), which the Company intends to use to recover the Company's revenue separate from the volume of gas it sells due to fluctuations in the weather.

Also on February 27, 2025, PGW filed a Petition for Waiver of Statutory Definition of Fully Projected Future Test Year (FPFTY Waiver Petition), requesting that the Commission waive the statutory definition of the Fully Projected Future Test Year (FPFTY) to permit PGW to use an FPFTY beginning on September 1, 2025, and ending August 31, 2026, instead of the FPFTY commencing on November 1, 2025.

Also on February 27, 2025, PGW filed Petition for Waiver Related to the Cap on the Distribution System Improvement Charge (DSIC Waiver Petition), to remove the reconciliation of its Distribution System Improvement Charge (DSIC) from the 7.5% DSIC cap, filed under Docket No. P-2025-3053659. On March 3, 2025, PGW filed a Motion to Consolidate DSIC Petition

(Motion to Consolidate), filed at Docket No. P-2025-3053659, with the above captioned rate case proceeding.

On March 10, 2025, the OCA filed a Formal Complaint and Public Statement in the above captioned rate proceeding to protect the interests of consumers in the Company's service territory and to ensure that the Company is permitted to implement only a level of rates that is just and reasonable and in accordance with sound ratemaking principles.

On March 10, 2025, the Commission's Bureau of Investigation & Enforcement (I&E) filed a Notice of Appearance. On March 11, 2025, the Office of Small Business Advocate (OSBA) filed a Notice of Appearance. On March 14, 2025, the OSBA filed a Complaint and Public Statement. Also on March 14, 2025, the OCA filed a Notice of Appearance.

On March 19, 2025, the OCA filed a letter with the Commission stating it does not oppose PGW's FPPTY Waiver Petition.

On March 19, 2025, the OCA filed an Answer in opposition to PGW's DSIC Waiver Petition. On March 19, 2025, the OCA filed an Answer in support of PGW's Motion to Consolidate. Also on March 19, 2025, I&E filed an Answer in opposition to PGW's DSIC Waiver Petition.

On March 26, 2025, the Philadelphia Industrial and Commercial Gas Users Group (PICGUG) filed a Complaint.

On March 27, 2025, the Tenant Union Representative Network (TURN) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed a Petition to Intervene.

On March 27, 2025, the Commission issued an Order that initiated an investigation into the lawfulness, justness, and reasonableness of the proposed rate increase in this filing in addition

to the Company's existing rates, rules, and regulations, assigned this matter to the OALJ for further proceedings as appropriate, and suspended the effective date of the tariff until November 28, 2025.

II. ISSUES

Based upon a preliminary analysis of the Company's general rate increase filing, the OCA has compiled a list of issues and sub-issues which it anticipates will be included in its investigation of the Company's rate request. It is anticipated that other issues may arise and may be pursued once the answers to all the OCA's interrogatories have been received and analyzed. The issues and sub-issues set forth below, and others that may develop during discovery, will be analyzed and presented as appropriate by the OCA with the assistance of its expert witnesses:

- A. Revenues and Expenses: The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues. The OCA will seek to ascertain whether or not PGW's claimed expenses are supported, reasonable, and appropriate. Among others, the following issues will be addressed:
- The sales forecast utilized by PGW in order to project future test year and fully forecasted test year sales and revenues;
 - PGW's proposed depreciation expense;
 - PGW's labor expense, information services expense, employee expenses, and risk management expense;
- B. Claimed Cash Requirements: The OCA will examine PGW's claimed cash requirements to determine whether the Company's claims are reasonable and properly supported.
- C. Rate Structure/Rate Design: The OCA will examine PGW's cost of service study, its proposed allocation of any rate increase to the customer classes, and its proposed design

of the rates. The OCA will also evaluate PGW's proposed increase to its customer charge. The OCA will examine other tariff issues raised by the filing.

- D. Weather Normalization Adjustment (WNA): The OCA submits that the continued application of PGW's WNA will result in unjust, unreasonable, and discriminatory rates for consumers.
- E. Revenue Normalization Adjustment (RNA): The OCA submits that the implementation of PGW's proposed RNA will result in unjust, unreasonable, and discriminatory rates for consumers.
- F. Universal Services: The OCA will examine PGW's proposed universal service program costs and cost recovery mechanisms.
- G. Other Issues: The OCA will examine the reasonableness and appropriateness of PGW's proposed tariff changes and will investigate those proposals to ensure that PGW is complying with all prior orders.

The OCA reserves the right to raise additional issues.

III. WITNESSES

The OCA intends to present the direct, rebuttal, and surrebuttal testimonies, as may be necessary, of the below witnesses. Each witness will present testimony in written form and will attach various exhibits, documents, and explanatory information, as may be necessary. In order to expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be mailed and/or emailed directly to the OCA's group email formed particularly for this proceeding.

Revenue Requirement / Accounting	Jennifer Rogers Exeter Associates, Inc. 10480 Little Patuxent Parkway, Suite 300 Columbia, MD 21044 OCA25PGWBRC@paoca.org
Cost of Service / Rate Structure/ Rate Design	Jerome D. Mierzwa Exeter Associates, Inc. 10480 Little Patuxent Parkway, Suite 300 Columbia, MD 21044 OCA25PGWBRC@paoca.org
Bond Rating / Cash Flow	Christopher Walters Brubaker & Associates, Inc. 16690 Swingley Ridge Road, Suite 104 Chesterfield, MO 63017 OCA25PGWBRC@paoca.org
Affordability of Service / Low-Income Customers Assistance Programs	Roger Colton Fisher, Sheehan, and Colton 34 Warwick Road Belmont, MA 02478-2841 OCA25PGWBRC@paoca.org
Customer Service / Tariff / Quality of Service	Barbara Alexander Barbara Alexander Consulting LLC 44 Beech St. Hallowell, ME 04347 OCA25PGWBRC@paoca.org
Alternative Ratemaking	Michael Deupree Acadian Consulting Group 5800 One Perkins Place, Suite 5F Baton Rouge, LA 70808 OCA25PGWBRC@paoca.org

The OCA specifically reserves the right to call additional witnesses, as necessary, and retains the flexibility to have the witnesses above address other areas of this case as the case proceeds. If the OCA determines that additional witnesses will be necessary for any portion of its case, it will notify all parties of record immediately.

IV. PROPOSED SCHEDULE

The OCA worked with the Company and the parties on a procedural schedule that is a reasonable compromise of the parties' competing interests within the time afforded for litigation of this matter. The OCA proposes the following schedule:

Public Input Hearings	Week of May 5, 2025
Other Parties' Direct Testimony	Wednesday, May 21, 2025
Other Parties' Supplemental Direct Testimony Regarding Public Input Hearings	May be needed depending on timing of public input hearings and other party direct testimony
Rebuttal Testimony (all parties and all issues)	Friday, June 20, 2025
Surrebuttal Testimony (all parties and all issues)	Wednesday, July 2, 2025
Written Rejoinder Outline & Witness Cross Examination Matrix	Friday, July 11, 2025 (by Noon)
Evidentiary Hearings (telephonic)	Tuesday, July 15, 2025, through Thursday, July 17, 2025
Main Briefs	Wednesday, July 30, 2025
Reply Briefs	August 8, 2025

The OCA requests that the dates included in any litigation schedule in this matter be considered "in-hand" dates and that electronic service on the due date will satisfy the "in-hand" requirement.

V. SERVICE ON THE OCA

The OCA respectfully requests that the Presiding Officer permit electronic service without the requirement of a follow-up hard copy. The OCA will be represented in this case by the attorneys listed below.

Harrison W. Breitman, Assistant Consumer Advocate

Katherine “Katie” Kennedy, Assistant Consumer Advocate
Ryan Morden, Assistant Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
E-Mail: OCA25PGWBRC@paoca.org

The OCA has created a group e-mail address provided above. This is the only email address that is required for service on the OCA. The OCA’s group email address will provide the emailed materials to all members of the OCA team including the consultants listed above.

The OCA also requests that the ALJ instruct the parties on the record as to whether consumers who have filed formal rate complaints in this proceeding should be included on the official service lists if those complainants have not indicated either at the prehearing conference, or prior to the prehearing conference, that they wish to be active parties to this proceeding.

For the purposes of the Prehearing Conference, Ryan Morden will be the primary attorney speaking on behalf of the OCA.

VI. SETTLEMENT

The OCA will participate in settlement discussions in this matter.

VII. DISCOVERY

In conjunction with its proposed schedule, the OCA proposes the following modifications to the Commission’s procedural rules regarding discovery. The OCA requests that the Presiding Officer direct that the modifications will take effect when addressed during the on the record prehearing conference and apply to all future discovery requests served on and after the date of the prehearing conference Monday, April 7, 2025. The OCA also requests that any outstanding interrogatories or requests for admissions are due no later than 10 calendar days after the Prehearing Conference to the extent such responses are due later than such date, in accordance with Paragraph A below.

- A. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within five (5) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
- F. Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.
- G. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

After rebuttal is served, the OCA proposes that the deadlines should be reduced as follows:

- A. Answers to interrogatories and responses to requests for document production, entry for inspection, or other purposes shall be served within five (5) calendar days of service of the interrogatories or requests for production.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within two (2) calendar days of service; unresolved objections shall be served on the propounding party in writing within three (3) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of written objections.

- D. Answers to motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admission shall be deemed admitted unless answered or objected to within three (3) calendar days of service.
- F. Discovery requests and discovery related pleadings (such as objections, motions, and answers to same) served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day preceding a holiday shall be deemed to have been served on the next business day.

VIII. PREHEARING PROCEDURES

The OCA requests that the ALJ in their Prehearing Conference Order and Evidentiary Hearing Notice clarify that:

A. Evidentiary hearing exhibits need not include all pre-served testimony which is circulated to the ALJ and parties in this proceeding in accordance with the above-referenced procedural schedule. However, such pre-served testimony may be identified for movement into the record at the hearing through an inventory of pre-served testimony which is provided as a hearing exhibit.

B. Evidentiary hearing exhibits may be provided to the ALJs and parties by 10 am the day before the start of evidentiary hearings with the exception of hearing exhibits related to rejoinder which may be provided by the end of the day on same day.

IX. PUBLIC INPUT HEARINGS

The OCA will be prepared to discuss public input hearings at the prehearing conference. Given the magnitude of the requested rate increase, the size of the customer base, and the requests for public input hearings and complaints received thus far in this matter, the OCA respectfully requests that both in-person and telephonic public input hearings be held for the Company's customer base impacted by this rate filing.

Attached as Appendix A is the OCA's proposed draft Notice for the Public Input Hearing (to be completed with details as determined by the presiding ALJ). The OCA requests the following:

A. Given the size of the customer base and service territory, a total of four (4) Public Input Hearings be held, two in-person and two telephonic.

B. The in-person public input hearings include a combination of daytime and evening hearings at a location with accessible and free parking or easy access to public transportation.

C. The telephonic public input hearings include a combination of daytime and evening hearings.

D. Pre-registration be either encouraged or required for telephonic hearings only, and if required, pre-registration be required by 10:00 a.m. on the day of the telephonic Public Input Hearing at which the witness seeks to testify.

E. Hearing exhibits for telephonic Public Input Hearings be required to be submitted to the ALJs by 10:00 a.m. the day before the Public Input Hearing at which the witness seeks to testify.

F. The Commission's notice of the Public Input Hearings will include the phone numbers and access codes necessary for participants to use to fully access all telephonic Public Input Hearings.

G. The Company will be required to, at a minimum, generate a notice of the Public Input Hearings that contains all relevant information as to date, time, location, and phone numbers and access codes and further be required to advertise the notice: (1) in the general readership section (not legal section) of local newspapers within the service territory; (2) on its website; and (3) in social media posts which the Company utilizes to advertise generally.

H. That the other parties involved in the proceeding, including the OCA, be permitted to review these public input announcements prior to their publication and distribution and have input into which publications the ads are placed.

X. COMMON BRIEFING OUTLINE

The OCA requests that, when the ALJ issue their Instructions for Briefs, the common outline provided by the ALJs will include Roman numeral-level headers for an Overall Position on Rate Increase section following the Summary of Argument section, as well as Alternative Ratemaking, Customer Service / Quality of Service, Customer Assistance Programs, and Tariff Issues (not otherwise briefed) sections of the brief which follow Rate Structure / Rate Design and

precede the Conclusion. The OCA's proposals for the common briefing outline are attached as Appendix B to this Prehearing Memorandum.

Respectfully submitted,

/s/ Ryan Morden

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DATED: April 4, 2025

Counsel for:

Darryl. A. Lawrence

Acting Consumer Advocate

OCA APPENDIX A

NOTICE OF IN-PERSON AND TELEPHONIC PUBLIC INPUT HEARINGS

For Philadelphia Gas Works Rate Increase Requests

Docket No.
R-2025-3053112

The Pennsylvania Public Utility Commission (PUC) will conduct 4 Public Input Hearings concerning the general rate increase requests filed by Philadelphia Gas Works on February 27, 2025, seeking to increase gas distribution rates by \$105 million per year. The in-person and telephonic hearings will be held at the following times and places:

Presiding Officer: Administrative Law Judge Eranda Vero

IN-PERSON PUBLIC INPUT HEARINGS

Pre-registration is not required.

Date: [Here]

Time: [Here]

Location: [Here]

Date: [Here]

Time: [Here]

Location: [Here]

TELEPHONIC PUBLIC INPUT HEARINGS

Pre-registration is [encouraged/required]. Read below.

Date: [Here]

Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Date: [Here]

Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Toll-free Conference Number: xxx.xxx.xxxx

PIN Number: xxxxxxxx

- You must dial the toll-free Conference number above
- You must enter the PIN number above when instructed
- You must speak your name when prompted, and press #
- Then, the telephone system will connect you to the hearing

PRE-REGISTRATION FOR TELEPHONIC PUBLIC INPUT HEARINGS: To testify at the telephonic Public Input Hearings, pre-registration is [encouraged/required] by [day of the hearing] at 10AM. Failure to pre-register could result in you not being called to testify by the PUC judge. To pre-register to testify by telephone, please contact the PUC Judge's Legal Assistant, [name], by email at [email address] or by phone at [xxx.xxx.xxxx] and provide the requested information.

NEED ASSISTANCE WITH PRE-REGISTRATION? If you need assistance pre-registering to testify, you may have someone register for you, but they will need to provide the PUC Judge all the information listed above. Additionally, if more than one person in your household would like to testify, one person may pre-register for other individuals in the same household by providing the PUC Judge's Legal Assistant with the above-listed information for each individual.

REQUESTS FOR INTERPRETERS: If you require an interpreter, please pre-register as soon as possible. If you register too close to the hearing date, we may not have enough time to arrange for an interpreter. If you request an interpreter, the PUC will make reasonable efforts to have one present. AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

HEARING EXHIBITS: If you have any hearing exhibits to which you will refer during the hearing, please email them to the PUC Judge's Legal Assistant, [name], at [email address]. The PUC Judge will forward your exhibits to all the parties. Exhibits for the public input hearing must be received by the PUC Judge by [the day before the hearing] at 10AM.

QUESTIONS? The Pennsylvania Office of Consumer Advocate (OCA) represents the interests of utility customers before the PUC. If you have questions about the public input hearings or the Company's requested rate increase, please contact the OCA toll free at 1-800-684-6560 or by email at consumer@paoca.org. Additionally, the OCA can help customers pre-register for the Public Input Hearings.

The Pennsylvania Office of Small Business Advocate (OSBA) is an independent state agency that represents the interests of small business consumers with 1-250 employees and which receives public utility service under a small commercial, small industrial, or small business rate classification. Please contact the OSBA if you are a small business owner/representative and have questions or need help with this proceeding: by email osba@pa.gov or telephone (717) 783-2525.

OTHER WAYS TO BE HEARD: If you want to be heard about the proposed rate increase but do not want or cannot testify at the Public Input Hearings, you may file a formal complaint or comment to the proposed rate increase. Please visit the PUC's website to use the applicable form available at <https://www.puc.pa.gov/complaints/formal-complaints/>

OCA APPENDIX B

OCA's Proposed Common Briefing Outline For General Rate Increase Proceeding

- I. Introduction and Procedural History
- II. Legal Standards
- III. Summary of Argument
- IV. Argument
 - A. Revenue Requirement
 - B. Expenses
 - C. Rate Structure
 - D. Customer Service
 - E. Low Income Customer Service
 - F. Alternative Ratemaking
 - G. Miscellaneous Issues
- V. Conclusion

Note: Appropriate modifications may be made. For instance, a party might add "Affiliated Interest Expenses" as a major topic heading or might brief only rate structure and not use other topic headings. A summary and alternatives should be provided under "Rate Structure" but the "Rate Base" and "Rate Structure" formats shown may be modified, as appropriate. Additional subheadings should be used, as appropriate.