



COMMONWEALTH OF PENNSYLVANIA

April 11, 2025

**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 of Pennsylvania, Inc /  
Docket No. R-2025-3053499**

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-referenced 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  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: Mark Ewen  
Parties of Record



consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. On March 20, 2025, Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”) filed Supplement No. 392 to Tariff Gas Pa. P.U.C. No. 9 (“Supplement No. 392”) with the Commission.

6. Supplement No. 392, if approved by the Commission, would increase the Company’s total annual operating revenues by approximately \$110.5 million.

7. Columbia states that the total bill for a small commercial customer using 150 therms of gas purchased from the Company, per month, would increase from \$240.61 to \$269.45, or by 11.99%.

8. In its March 20<sup>th</sup> filing, Columbia proposes a return on equity of 11.35%. The Company’s request for a 11.35% return on equity includes a request for recognition of Columbia’s managerial performance as a 25-basis point increase to the Company’s proposed return on equity of 11.10%.

9. Columbia proposes to make its Weather Normalization Adjustment (“WNA”) permanent, and to add a Revenue Normalization Adjustment (“RNA”).

10. Columbia also proposes an Economic Development Distribution Service tariff. The Company claims that the proposed tariff will allow Columbia to enter into individual contracts with new, large volume customers in a manner that will provide for accelerated cost recovery.

11. Columbia also proposes to initiate an Energy Efficiency Program Pilot for small commercial customers.

12. After preliminary review of the materials filed by Columbia 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.

13. Complainant believes, and therefore avers, that Columbia'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 the Company.

14. 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. 392;
- b) At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Supplement No. 392 to the extent required to make certain that Columbia'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/ Steven C. Gray*

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

For:  
NazAarah Sabree  
Small Business Advocate

Commonwealth of Pennsylvania  
Office of Small Business Advocate  
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Harrisburg, PA 17101

Dated: April 11, 2025



in addition to the Company's proposal to make permanent its Weather Normalization Adjustment ("WNA").

In its filing, Columbia states that the total bill for a small commercial customer using 150 therms of gas purchased from the Company, per month, would increase from \$240.61 to \$269.45, or by 11.99%.

Columbia proposes a return on equity of 11.35%. The Company's request for a 11.35% return on equity includes a request for recognition of Columbia's managerial performance as a 25-basis point increase to the Company's proposed return on equity of 11.10%.

Columbia also proposes an Economic Development Distribution Service tariff. The Company claims that the proposed tariff will allow Columbia to enter into individual contracts with new, large volume customers in a manner that will provide for accelerated cost recovery.

Columbia also proposes to initiate an Energy Efficiency Program Pilot for small commercial customers.

The Small Business Advocate has filed a formal Complaint against Columbia's proposed rate increase and other changes to protect the interests of the Company's small business customers.

A thorough inquiry by the Commission into all elements of Columbia's Supplement No. 392 is necessary to ensure that any rate increases, or new programs, 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 Columbia's Supplement No. 392. The Small Business Advocate will ask the Commission to deny any proposed rate increase or other changes in Columbia's present tariffs that apply to small business customers that are not

proven to be lawful, just, reasonable, and non-discriminatory.

Dated: April 11, 2025

**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: April 11, 2025

  
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(Signature)

