



April 11, 2025

VIA E-File Only

Secretary Rosemary Chiavetta
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

Petition to Intervene and Answer of CAUSE-PA

Dear Secretary Chiavetta:

Please find the attached **Petition to Intervene and Answer of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,



John W. Sweet, Esq.
Counsel for CAUSE-PA

CC: Certificate of Service

Pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (“PUC” or “Commission”), 52 Pa. Code §§ 5.61-5.76, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby submits its Petition to Intervene and files its Answer in the captioned proceeding. In support thereof, CAUSE-PA states as follows:

1. On March 20, 2025, Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”) submitted a rate filing pursuant to Section 1308(d) of the Public Utility Code, Supplement No. 392 to Tariff Gas Pa. P.U.C. No. 9 (“Supplement No. 392”) in which it proposes to increase rates to its customers by approximately \$110.5 million per year over existing rates. (Filing Cover Ltr. at 1).

2. If the Company’s request is approved as requested, the monthly bill for a residential customer using an average of 70 therms of gas per month would increase from \$138.52 to \$154.29 per month, or by 11.38 percent. (Filing Cover Ltr. at 2).

3. In its proposed rate structure, Columbia also seeks to continue its pattern of shifting its business risk from its shareholders to customers in at least three ways: (1) it seeks an extraordinary increase in its fixed monthly residential customer charge from \$17.25 to \$31.97 per month. This is an increase of 85% or \$14.72 per month (\$176.64 per year). (Columbia St. 6 at 21); (2) The Company also seeks to make permanent its Weather Normalization Adjustment, a charge that generates millions of dollars each year from customers (Columbia St. 1 at 9).; and (3) it seeks to establish a new Revenue Normalization Adjustment Mechanism that would guarantee revenue to the Company regardless of usage (Id.).

4. CAUSE-PA files this Petition to Intervene and Answer because it is concerned about the ability of Columbia's low income customers to endure yet another increase in rates from the Company, as well as the Company's efforts to shift nearly all the risk of reduced natural gas throughput from its shareholders to its customers. CAUSE-PA is deeply concerned that Columbia's proposals will have a disproportionately harmful impact on low income customers and other vulnerable customer groups.

Petition to Intervene

5. Eligibility to intervene in Commission proceedings is governed by 52 Pa. Code § 5.72, which provides in relevant part that “[a] petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought.” 52 Pa. Code § 5.72(a).

6. Section 5.72 further provides that the right or interest may be one “which may be directly affected, and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.” 52 Pa. Code. § 5.72(a)(2).

7. Even though Section 5.72 speaks of the rights of a “person” to intervene, the Commonwealth Court has consistently stated that “an association may have standing as a representative of its members ... as long as an organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action, [i.e., is aggrieved, the organization] has standing.” Energy Cons. Council of Pa. v. Pa. PUC, 995 A.2d 465, 476 (Pa. Commw. 2010) (alteration in original) (citing Tripps Park v. Pa.

PUC, 415 A.2d 967 (Pa. Commw. 1980); Parents United for Better Schools v. School District of Philadelphia, 646 A.2d 689 (Pa. Commw. 1994)).

8. CAUSE-PA is an unincorporated association of low and moderate income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating, and telecommunication services.

9. CAUSE-PA membership is open to moderate and low income individuals residing in the Commonwealth of Pennsylvania who are committed to the goal of helping low income families maintain affordable access to utility services and achieve economic independence.

10. CAUSE-PA is located, c/o the Pennsylvania Legal Aid Network, at 118 Locust Street, Harrisburg, PA 17101.

11. CAUSE-PA has a significant interest in the impact that Columbia's proposed rate increase will have on moderate and low income residential customers. These interests are not adequately represented by other participants in this proceeding.

12. Members of CAUSE-PA are located within Columbia's service territory and will be directly affected by the outcome of this proceeding. Particularly, this proceeding will affect the price that CAUSE-PA members pay for gas service as well as the reliability and quality of that service.

13. In addition, CAUSE-PA has been an active party to Columbia's prior rate proceedings, , as well as other related proceedings, such as its Universal Service and Energy Conservation Plan. The outcome of this proceeding will impact settlements and orders from these prior proceedings, and CAUSE-PA therefore has a significant interest in the impact of Columbia's proposals set forth in this proceeding.

14. CAUSE-PA has standing to intervene because its members have or will suffer a direct, immediate, and substantial injury to an interest as a result of this proceeding. See Energy Cons. Council of Pa., 995 A.2d at 476.

15. CAUSE-PA is represented in this proceeding by:

John W. Sweet, Esq., PA ID: 320182
Ria M. Pereira, Esq., PA ID: 316771
Lauren N. Berman, Esq., PA ID: 310116
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
Telephone: 717-236-9486
Facsimile: 717-233-4088
E-mail: pulp@pautilitylawproject.org

16. Counsel for CAUSE-PA consents to the service of documents by electronic mail to pulp@pautilitylawproject.org, as provided in 52 Pa. Code § 1.54(b)(3).

Answer

17. CAUSE-PA has preliminarily reviewed Columbia's rate filing and objects to Columbia's request on the grounds that the proposed rate increase and rate design will likely result in unjust and unreasonable rates that would impose economic hardship on low and moderate income residential customers.

18. Continued delivery of safe, affordable gas service is of critical importance to the safety, welfare, and economic stability of all Pennsylvanians – particularly those with limited financial means. In recognition of this fact, the law requires that utility services, including natural gas services, will be universally available at an affordable rate, and that all universal service programs be developed, maintained, and appropriately funded to ensure such affordability. See 66 Pa. C.S. § 2203(3), (8).

19. Columbia's general rate increase and its rate design proposals would pose a significant

increase in the costs of basic gas service for its customers, could have a disproportionately and adversely affect households with limited economic means, and will undermine bill savings achieved through adoption of energy efficiency and conservation measures.

20. CAUSE-PA submits that Columbia's Weather Normalization Adjustment (WNA) and proposed Revenue Normalization Adjustment (RNA) mechanisms will have serious, unmitigable, and disproportionately harmful impacts on low and moderate income customers. Based on a preliminary review, CAUSE-PA submits that introduction of the RNA and the continued application of Columbia's WNA may result in unjust, unreasonable, and discriminatory rates for consumers and must be reviewed by the Commission.

21. CAUSE-PA is also concerned whether Columbia's existing and proposed terms and conditions for service are consistent with the billing, collections, and terminations standards set forth under the Public Utility Code and Commission regulations. Further scrutiny is necessary to ensure that services are provided to Columbia's customers in a manner that is fully consistent with statute, regulation, and prevailing Commission policy.

22. CAUSE-PA asserts that these matters, and any future modifications presented by intervening parties, must be thoroughly reviewed and investigated to ensure that all customers are able to access safe, affordable natural gas service within the Columbia service territory.

WHEREFORE, CAUSE-PA respectfully requests that the Commission enter an order granting CAUSE-PA full status as an intervener in this proceeding with active party status.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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Date: April 11, 2025

Verification

I, **Ria M. Pereira**, legal counsel for CAUSE-PA, on behalf of CAUSE-PA, hereby states that the facts contained in the foregoing pleadings are true and correct to the best of my knowledge, information, and belief, that I am duly authorized to make this Verification, 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).



Ria M. Pereira, Esq.

*On behalf of the Coalition for Affordable Utility
Services and Energy Efficiency in Pennsylvania*

Dated: April 11, 2025

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2025-3053499
 :
 Columbia Gas of Pennsylvania, Inc. :

Certificate of Service

I hereby certify that I have this day served copies of the **Petition to Intervene and Answer of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

VIA EMAIL ONLY

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