



July 31, 2020

Via Efiling

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Philadelphia Public Utility Commission v. Philadelphia Gas Works
Docket No. R-2020-3017206**

Dear Secretary Chiavetta:

The Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (collectively, TURN *et al.*) submit this letter in support of the Petition of the Office of Consumer Advocate (OCA) for Interlocutory Review and Answer to Material Question in the above referenced case. As with the Petition for Interlocutory Review and Answer to Material Question submitted by TURN *et al.*, TURN *et al.* submits that the ALJs erred in finding that the language access considerations raised by Mr. Colton are not relevant to an examination of the quality of service provided by PGW.

As noted in TURN *et al.*'s Petition, "[t]he customer service a utility provides to its customers must be relevant to a request to increase rates. The law cannot impose an obligation on customers to pay for the cost of service without a reciprocal obligation of the utility to satisfy

Center City Office: 1424 Chestnut St. | Philadelphia, PA 19102-2505 | Telephone: 215-981-3700 clsphila.org

North Philadelphia Law Center: 1410 West Erie Ave. | Philadelphia, PA 19140-4136 | Telephone: 215-227-2400



standards of reasonable service.”¹ The stricken sections of Mr. Colton’s testimony are directly responsive to PGW’s claims of improved customer service and consistent with the Commission’s own recognition of the importance of language access as a matter of customer service.²

For the same reasons set forth in TURN *et al.*’s Brief³ regarding Mr. Geller’s Direct Testimony, the Commission should grant interlocutory review, answer OCA’s material question in the affirmative, and reinstate the stricken portions of Mr. Colton’s Direct Testimony.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joline R. Price'.

Joline R. Price, Esquire
Attorney ID No. 315405

Enclosures

Cc: Certificate of Service

¹ Petition of TURN *et al.* for Interlocutory Review and Answer to Material Question (July 15, 2020) at 2 (internal citations omitted). As noted in TURN *et al.*’s Petition, in previous PGW rate cases, the Commission has found that customer service issues are relevant, and implemented conditions on PGW as a part of approving a rate increase. See Pennsylvania Public Utility Commission *et al.* v. Philadelphia Gas Works, Docket No. R-00005654 (Order entered Nov. 22, 2000), 94 Pa. P.U.C. 479.

² See, e.g., 52 Pa. Code § 56.91 (b) (17), 52 Pa. Code § 56.201 (requiring utilities to provide information in other languages in certain circumstances).

³ See Brief of TURN *et al.* in Support of Their Petition for Interlocutory Review and Answer to Material Question (July 27, 2020).

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2020- 3017206
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Office of Consumer Advocate	:	C-2020-3019161
Office of Small Business Advocate	:	C-2020-3019100
Philadelphia Industrial and Commercial Gas User Group	:	C-2020-3019430
	:	
v.	:	
	:	
Philadelphia Gas Works	:	

Certificate of Service

I hereby certify that I have this day served copies of the Letter of TURN *et al.* in Support of the Petition of the Office of Consumer Advocate for Interlocutory Review and Answer to Material Question upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code §1.54 in the manner and upon the persons listed below.

VIA EMAIL

The Honorable Darlene Heep
Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
dheep@pa.gov

The Honorable Marta Guhl
Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
mguhl@pa.gov

Gregory J. Stunder, Esq.
Graciela Christlieb, Esq.
Craig Berry, Esq.
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122
Greg.Stunder@pgworks.com
Graciela.christlieb@pgworks.com
Craig.Berry@pgworks.com

Daniel Clearfield, Esq.
Sarah Stoner, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
sstoner@eckertseamans.com

Lauren M. Burge, Esq.
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com

Darryl A. Lawrence, Esq.
Christy M. Appleby, Esq.
Santo G. Spataro, Esq.
Laura Antinucci, Esq.
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
OCAPGW2020@paoca.org

Sharon E. Webb, Esq.
Daniel G. Asmus, Esq.
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov
dasmus@pa.gov

John W. Sweet, Esq.
Elizabeth R. Marx, Esq.
Ria M. Pereira, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

Carrie B. Wright, Esq.
Bureau of Investigation & Enforcement
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105
carwright@pa.gov

Cassandra R. McCrae, Esq.
Devin McDougall, Esq.
Earthjustice
1617 John F. Kennedy Blvd, Suite 1130
Philadelphia, PA 19103
cmccrae@earthjustice.org
dmcdougall@earthjustice.org

Joseph Otis Minott, Esq.
Ernest Logan Welde, Esq.
Clean Air Council
135 South 19th Street, Suite 300
Philadelphia, PA 19103
joe_minott@cleanair.org
lwelde@cleanair.org

Todd S. Stewart, Esq.
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
Tsstewart@hmslegal.com

Charis Mincavage, Esq.
Adeolu A. Bakare, Esq.
Jo-Anne Thompson, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
jthompson@mcneeslaw.com

Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
rdk@indecon.com



Joline R. Price, Esquire
Attorney ID: 315405
Attorney for TURN *et al.*
COMMUNITY LEGAL SERVICES, INC.
jprice@clsphila.org
(215) 981-3756

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