



September 9, 2020

**VIA eFILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**Re: Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2021-2023**

**Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016 52 Pa Code § 62.4 — Request for Waivers**

Dear Secretary Chiavetta:

Enclosed please find the Prehearing Memorandum, on behalf of Tenant Union Representative Network (TURN), in the above-captioned proceeding. Copies have been served on the parties of record in accordance with the Certificate of Service. If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

Josie B. H. Pickens, Esquire (Attorney ID: 309422)  
Robert W. Ballenger, Esquire (Attorney ID: 93434)  
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Enc.

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for	:	
Approval of Its Demand-Side Management	:	
Plan for FY 2021-2023	:	
	:	P-2014-2459362
Philadelphia Gas Works Universal Service	:	
and Energy Conservation Plan for 2014-2016	:	
52 Pa Code § 62.4 — Request for Waivers	:	

**CERTIFICATE OF SERVICE**

I hereby certify that this day I have served a copy of the Prehearing Memorandum of Tenant Union Representative Network upon the parties listed below, in accordance with the requirements of 52 PA. Code § 1.54.

**Via Email Only**

The Honorable F. Joseph Brady  
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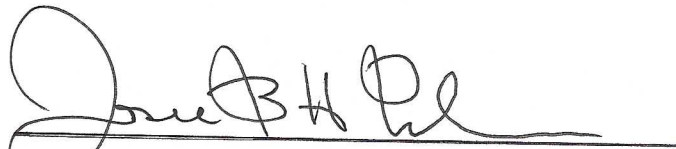
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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Josie B. H. Pickens", written over a horizontal line.

Josie B. H. Pickens, Esquire (Attorney ID: 309422)  
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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Philadelphia Gas Works Universal Service	:	
and Energy Conservation Plan for 2014-2016,	:	
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**Prehearing Memorandum of the Tenant Union Representative Network**

On September 2, 2020, Administrative Law Judge F. Joseph Brady issued a Prehearing Conference Order setting a telephonic prehearing conference for Thursday, September 10, 2020 at 10:00am and requiring parties to file a Prehearing Memorandum no later than 12:00 pm on Wednesday, September 9, 2020. In response, the Tenant Union Representative Network (“TURN”), through its attorneys at Community Legal Services, Inc., hereby files this Prehearing Conference Memorandum.

**I. Background**

On May 7, 2020, Philadelphia Gas Works (PGW) filed its EnergySense Demand Side Management Portfolio Implementation Plan for Fiscal Years 2021-2023 (DSM III). On August 31, 2020, the Commission’s Office of Administrative Law Judge issued a Telephonic Prehearing Conference Notice, scheduling a Call-In Telephonic Prehearing Conference before Administrative Law Judge (ALJ) F. Joseph Brady for September 9, 2020. On September 2,

2020, the Call-In Telephonic Prehearing Conference was rescheduled for September 10, 2020.

Also, on September 2, 2020, TURN filed a Petition to Intervene in this proceeding.

**II. Discovery**

TURN will work with the parties to develop appropriate modifications to discovery rules that support the prompt and robust exchange of all relevant information.

**III. Settlement**

TURN is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourage the parties to engage in settlement early in the process.

**IV. Issues to be Presented**

TURN has reviewed PGW's filing and intends to examine whether PGW's DSM programs effectively reduce household consumption and ultimately increase the affordability of gas bills. TURN also intends to examine whether PGW's DSM programs are adequately funded and available to low-income Philadelphia tenants, including tenants who may reside in multi-family dwellings where PGW has proposed to curtail offerings in the future. TURN reserves the right to examine any other issues that arise in the course of this proceeding.

**V. Witnesses and Testimony**

TURN reserves the right to call witnesses as may be warranted upon proper notice to Your Honor and the parties.

**VI. Proposed Schedule**

TURN is prepared to work with Your Honor and the parties to establish a reasonable litigation schedule. The schedule should provide adequate time and opportunity for a thorough analysis of PGW's filing and any discovery requests.

**VII. Evidentiary Hearings**

In light of the ongoing COVID-19 pandemic, TURN submits that a telephonic or remote process should be established for any evidentiary hearings that are scheduled in this proceeding.

**VIII. Service on TURN**

TURN is represented by the attorneys at Community Legal Services, Inc. Electronic service of all documents should be served on TURN as follows:

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Robert W. Ballenger, Esquire  
Kintéshia Scott, Esquire

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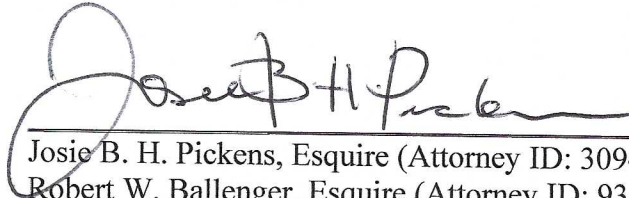
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WHEREFORE, TURN respectfully submits this Prehearing Conference

Memorandum.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Josie B. H. Pickens". The signature is written in a cursive style with a large initial "J".

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Robert W. Ballenger, Esquire (Attorney ID: 93434)

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