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July 27, 2023

Via Electronic Filing

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

Re: Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2024-2026
Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016;
52 Pa. Code § 62.4 – Request for Waivers – Docket No. P-2014-2459362

Dear Secretary Chiavetta:

On June 16, 2023, Philadelphia Gas Works (“PGW” or “Company”) filed its Demand Side Management Implementation Plan for Fiscal Years 2024-2026 (“FY24-26 Plan”) in the above-referenced docket, which described program budgets and implementation details that PGW will follow to implement its EnergySense Demand-Side Management Portfolio from September 1, 2023 to August 31, 2026. **Through this letter, PGW proposes to delay implementation of the FY24-26 Plan and instead maintain its currently effective Plan (“FY21-23 Plan”) until it receives Commission approval to implement the FY24-26 Plan.**

On July 5, 2023, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) filed a Petition to Intervene and Answer to PGW’s FY24-26 Implementation Plan. Similarly, the Office of Consumer Advocate (“OCA”) filed an Answer on July 6, 2023.¹ Each of these Answers requested that PGW’s FY24-26 Plan be referred to the Office of Administrative Law Judge (“OALJ”) for hearings.

Pursuant to prior Commission orders,² the FY24-26 Plan is currently scheduled to go into effect on September 1, 2023. The new programming included in the FY24-26 Plan will require significant investment by PGW to implement, including issuing RFPs, website and other IT buildout, etc. Given that OCA and CAUSE-PA have requested that the FY24-26 Plan be

¹ Tenant Union Representative Network (“TURN”) also filed a Petition to Intervene on July 26, 2023.

² See the Tentative Opinion and Order entered August 4, 2016 and the Final Opinion and Order entered November 1, 2016 at the above-referenced docket.

referred to OALJ for hearings, PGW is concerned that it may spend significant resources to implement these plan changes when further changes may be required by any final order in this proceeding. For this reason, PGW proposes to continue its current DSM programming under the FY21-23 Plan until a final order is issued approving implementation of the FY24-26 Plan. PGW has conferred with the parties in this proceeding and all active parties have indicated that they do not oppose this proposal.³

Please contact me with any questions or concerns.

Sincerely,

/s/ Lauren M. Burge
Lauren M. Burge, Esq.

cc: Hon. F. Joseph Brady w/enc.
Cert. of Service with enc.

³ OCA, CAUSE-PA, the Bureau of Investigation and Enforcement (“I&E”), the Office of Small Business Advocate (“OSBA”), Tenant Union Representative Network (“TURN”), and the Philadelphia Industrial and Commercial Gas Users Group (“PICGUG”) have all indicated their non-opposition to PGW’s proposal. Clean Air Council did not respond to PGW’s correspondence; however, they were not an active party in the FY21-23 proceeding and have not been an active party in the FY24-26 proceeding to date.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing **Letter** upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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Dated: June 27, 2023

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