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August 14, 2023

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

**VIA ELECTRONIC FILING**

**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:

Attached for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") is the Petition to Intervene on behalf of the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Charis Mincavage'.

Charis Mincavage  
MCNEES WALLACE & NURICK LLC

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

c: F. Joseph Brady, Administrative Law Judge (via e-mail)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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Charis Mincavage

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

Dated this 14<sup>th</sup> day of August, 2023, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PETITION TO INTERVENE OF THE PHILADELPHIA  
INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

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TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to the provisions of 52 Pa. Code §§ 5.71-5.74, the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, PICGUG states as follows:

1. Petitioner is the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG"). The composition of PICGUG is attached hereto as Appendix A. PICGUG reserves the right to modify Appendix A throughout the course of this proceeding, as necessary.

2. The names and address of Petitioner's attorneys are:

Charis Mincavage (Pa. I.D. 82039)  
Adeolu A. Bakare (Pa. I.D. 208541)  
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3. On June 16, 2023, Philadelphia Gas Works ("PGW" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") its Demand-Side Management Program Implementation Plan for Fiscal Years 2024-2026, which details the program budgets and implementation of PGW's EnergySense Demand-Side Management Portfolio from September 1, 2023, through August 31, 2026 ("FY24-26 Plan"). Through the FY24-26 Plan, PGW proposed seven programs comprising its EnergySense Portfolio.

4. On July 27, 2023, PGW filed a letter proposing to delay implementation of the FY24-26 Plan and, instead, maintain its currently effective Plan ("FY21-23 Plan") until the Commission approves implementation of the FY24-26 Plan.

5. PICGUG is an *ad hoc* group of large volume natural gas customers receiving service from PGW under various rate schedules. PICGUG members use substantial volumes of natural gas in their businesses, and natural gas costs comprise a significant element of their respective costs of operation. PGW's FY24-26 Plan may affect several of the Company's rate schedules, including schedules under which PICGUG members receive service. As a result, any PUC determination regarding PGW's FY24-26 Plan may impact PICGUG members' interests.

6. Therefore, consistent with 52 Pa. Code § 5.72(a), PICGUG has a significant interest in this proceeding that is not represented by any other party of record. *See* 52 Pa. Code § 5.72(a). Accordingly, the Commission should grant PICGUG intervenor status in this proceeding.

**WHEREFORE**, the Philadelphia Industrial and Commercial Gas Users Group respectfully requests that the Commission grant this Petition to Intervene and provide PICGUG with full party status.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By  \_\_\_\_\_

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Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

Dated: August 14, 2023



**APPENDIX "A"**

**PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

Einstein Healthcare Network

Newman & Company

Philadelphia College of  
Osteopathic Medicine

Temple University

Thomas Jefferson University