

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
	:	Docket Nos. P-2009-2097639
v.	:	R-2009-2139884
	:	
Philadelphia Gas Works	:	ELECTRONICALLY FILED

**INTERVENOR CLEAN AIR COUNCIL’S RESPONSE TO
PHILADELPHIA GAS WORKS’ MOTION TO CONSOLIDATE**

1. Intervenor, the Clean Air Council (“Intervenor” or “the Council”) is a non-profit, member-supported organization with offices located in Philadelphia, Pennsylvania, and Harrisburg, Pennsylvania. The Council’s mission is to protect everyone’s right to breathe clean air. Through public education, community advocacy, and government oversight, the Council seeks to ensure the enforcement of environmental laws.

2. On April 20, 2009, Philadelphia Gas Works (“PGW”) filed a Revised Petition for Approval of Energy Conservation and Demand-Side Management Plan (“Petition”). PGW’s proposed voluntary Demand-Side Management Plan (hereinafter “DSM Plan”) outlines seven portfolio programs that PGW hopes to implement over the course of the next five years. The DSM Plan proceedings are pending before the Commission at Docket No. P-2009-2097639 (the “DSM Plan Proceeding”).

3. Given the Council’s mission of protecting the public’s right to breathe clean air and ensuring the enforcement of environmental laws, the Council intervened in the DSM Plan Proceedings on behalf of the public interest of the residents of the City of Philadelphia, including PGW’s residential customers, as well as the residents of the Commonwealth. The Council generally supports the goals and concepts of the proposed DSM Plan, but intervened to highlight aspects of the DSM Plan that require greater

specificity and to ensure that the implementation of the DSM Plan, as and if approved, will actually achieve its projected goals and maximize its contemplated benefits to the public. All citizens in PGW's service area of the City of Philadelphia, especially low-income residents, have an interest in efficient energy use, cleaner air and an expanded clean energy workforce. These interests extend beyond Philadelphia's municipal boundaries to the greater Philadelphia metropolitan region and indeed to all residents of the Commonwealth.

4. On or about December 18, 2009, PGW submitted its 2009 base rate filing to the Commission, at Docket No. R-2009-2139884 (the "Base Rate Proceeding"). Simultaneously, PGW filed a Motion to Consolidate the DSM Plan Proceeding with the Base Rate Proceeding (the "Motion to Consolidate"). The Motion to Consolidate averred, among other things, that the Council supports the Motion to Consolidate.

5. The Council supports and concurs with the Motion to Consolidate, and asserts that economies, efficiencies, and the public interest will best be served by consolidating the DSM Plan Proceeding with the Base Rate Proceeding.

WHEREFORE, the Clean Air Council respectfully requests that the Commission grant Philadelphia Gas Works' Motion to Consolidate Docket Nos. P-2009-2097639 and R-2009-2139884.

Respectfully submitted,

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Dated: December 29, 2009

CERTIFICATE OF SERVICE

I hereby certify that on this day, I served a true and correct copy of the foregoing document via the PUC's electronic filing and service system upon the following:

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