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April 12, 2013

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

**RE:** Pennsylvania Public Utility Commission v. Philadelphia Gas Works; Docket No. R-2008-2073938; **PREHEARING CONFERENCE MEMORANDUM OF INTERSTATE GAS SUPPLY, INC. AND DOMINION RETAIL, INC.**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Prehearing Conference Memorandum of Interstate Gas Supply, Inc. and Dominion Retail, Inc. in the above-captioned docket. Copies of this Memorandum have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart  
*Counsel for Dominion Retail, Inc., Interstate Gas Supply, Inc.,*

TSS/jld

Enclosure

cc: Administrative Law Judge Christopher P. Pell (via email and overnight delivery)  
Per Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA ELECTRONIC & FIRST CLASS MAIL**

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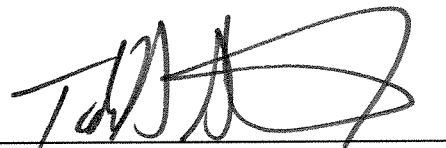
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Todd S. Stewart

Dated: April 12, 2013

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2008-2073938
	:	
Philadelphia Gas Works	:	

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**PREHEARING CONFERENCE MEMORANDUM  
OF INTERSTATE GAS SUPPLY, INC.  
AND DOMINION RETAIL, INC.**

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**NOW COME** Interstate Gas Supply, Inc. (“IGS”) and Dominion Retail, Inc. d/b/a Dominion Energy Solutions (“DES”) and hereby provide the Honorable Presiding Administrative Law Judge with their Prehearing Conference Memorandum as required by the Presiding Administrative Law Judge Christopher P. Pell’s (“ALJ”) Prehearing Conference Order dated April 5, 2013.

IGS/DES respectfully report that significant progress has been made in achieving a settlement in the above-captioned matter. By this Prehearing Memorandum, in addition to providing the information requested by ALJ in his Prehearing Conference Order, IGS/DES request that a further Prehearing Conference be scheduled, in approximately one month’s time, to allow for the Parties to achieve further success in this direction, and further request that until after the date of that Conference, that any further procedural schedule be stayed.

**I. ACCEPTANCE OF SERVICE**

1. Service of all documents in this proceeding shall be accepted on behalf of IGS/DES by the following counsel:

Todd S. Stewart, Attorney I.D. No. 75556  
Hawke McKeon & Sniscak LLP  
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## **II. DISCOVERY**

2. At this plan, IGS/DES do not expect to engage in the discovery process. If that position changes, IGS/DES would expect to do so expeditiously and in conformance with the Commission's regulations.

## **III. SETTLEMENT**

3. IGS/DES are confident that a full settlement in this matter is achievable and have made substantial and significant progress in that direction with a subset of the Parties to this proceeding. IGS/DES look forward to completing that process by reaching out the other parties to the SOLR proceeding as well as the POR collaborative, and developing a proposal that is acceptable to all.

## **IV. SCHEDULE**

4. As a consequence of the substantial progress that already has been achieved with regard to settlement, IGS/DES respectfully submit that establishing a procedural schedule at this time would require the Parties to divert resources away from the current settlement efforts, which have gained momentum in recent weeks, and toward a litigation mode and that such a result is not optimal for any party. Accordingly, IGS/DES respectfully request that a further Prehearing Conference be scheduled in approximately one month to allow the settlement process time to conclude.

**V. ISSUES**

5. The issues in this case continue to be the implementation of a purchase of receivables program, billing system improvements, customer education and other competitive enhancements and the appropriate assignment of the costs of these programs.

**VI. WITNESSES**

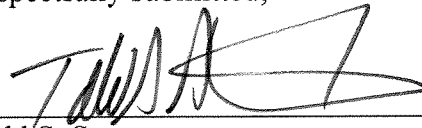
6. If a settlement is not achieved and if required to do so, IGS/DES would expect to support their position through the testimony of at least one witness, who has not yet been identified. If a procedural schedule is imposed that would include submission of testimony, IGS/DES will identify any expected witness as early as practical.

**VIII. EVIDENCE**

7. If necessary, IGS/DES would expect to submit the testimony of one or more witnesses in support of their positions.

**WHEREFORE,** IGS/DES respectfully submit their Prehearing Conference Memorandum and request that an additional Prehearing Conference be scheduled in one month and that the procedural schedule of this proceeding be otherwise stayed until that time.

Respectfully submitted,



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*Counsel for Counsel for Dominion Retail, Inc.  
and Interstate Gas Supply, Inc.*

DATED: April 12, 2013