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September 9, 2020

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 2021-2023; 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 is the Prehearing Memorandum of the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") in the above-referenced proceeding.

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this filing upon request.

Sincerely,

McNEES WALLACE & NURICK LLC

By 

Jo-Anne Thompson

Counsel to the Philadelphia Industrial and Commercial Gas Users Group

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

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## 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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Jo-Anne S. Thompson

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

Dated this 9<sup>th</sup> day of September, 2020, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for	:	
Approval of Demand-Side Management	:	
Plan for FY 2021-2023	:	
and	:	
Philadelphia Gas Works Universal	:	Docket No. P-2014-2459362
Service and Energy Conservation Plan	:	
for 2014-2016, 52 Pa. Code § 62.4 -	:	
Request for Waivers	:	

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**PREHEARING MEMORANDUM OF THE PHILADELPHIA  
INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

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As requested by Administrative Law Judge ("ALJ") F. Joseph Brady in his September 2, 2020, Prehearing Conference Order, the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") hereby submits this Prehearing Memorandum in the above-captioned proceeding.

**I. HISTORY OF THE PROCEEDING**

On May 7, 2020, Philadelphia Gas Works ("PGW" or "Company") filed its Implementation Plan, which details the program budgets and implementation of PGW's EnergySense Demand-Side Management Portfolio from September 1, 2020 to August 31, 2023. ("2020 DSM Plan"), with the Pennsylvania Public Utility Commission ("PUC" or "Commission"). Within the 2021-2023 Implementation Plan, PGW proposes to continue four of the five existing DSM programs.

On September 9, 2020, PICGUG filed a Petition to Intervene in this proceeding. A description of PICGUG is set forth in Paragraph 4 of PICGUG's Petition to Intervene. PICGUG's Petition to Intervene awaits disposition by the ALJ.

A Prehearing Conference is scheduled in this proceeding for September 10, 2020.

## **II. ANTICIPATED ISSUES AND SUB-ISSUES**

PICGUG is monitoring PGW's cost recovery mechanisms and proposed revenue adjustments. PICGUG will address any rate design and cost allocation issues that may arise. PICGUG also reserves the right to raise further issues and to respond to issues raised by other parties.

## **III. PROPOSED WITNESSES**

PICGUG is still evaluating whether it will present any witnesses in this proceeding. If PICGUG determines that it will present such witnesses, PICGUG will inform the ALJ and the other parties as soon as possible. PICGUG intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions and reply exceptions, if necessary.

## **IV. PROPOSED SCHEDULE AND DISCOVERY RULES**

PICGUG will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJ. In addition, PICGUG will defer to the parties at the Prehearing Conference regarding the amount of hearing time needed.

**V. POSSIBILITY OF SETTLEMENT**

PICGUG is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By  \_\_\_\_\_

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Dated: September 9, 2020