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March 10, 2021

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 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:

Enclosed for electronic filing please find Philadelphia Gas Works' Revised Statement in Support of the Joint Petition for Settlement with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely

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

LMB/lww

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

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the PGW's Revised Statement in Support of Joint Petition for Settlement 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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Lauren M. Burge, Esq.

Dated: March 10, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for :
Approval of Demand-Side Management :
Plan for FY 2016-2020 :
: 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 :

**PHILADELPHIA GAS WORKS’
REVISED STATEMENT IN SUPPORT
OF THE
JOINT PETITION FOR SETTLEMENT**

Philadelphia Gas Works (“PGW” or the “Company”) hereby submits this Statement in Support of the Joint Petition for Settlement (“Settlement” or “Joint Petition”) filed in the above-captioned proceeding.¹

The Settlement is joined in by the Office of Consumer Advocate (“OCA”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”). Additionally, the Office of Small Business Advocate (“OSBA”), the Philadelphia Industrial and Commercial Gas Users Group (“PICGUG”), and the Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (“TURN, *et al.*”) do not oppose the Settlement.²

¹ PGW originally submitted its Statements in Support of the Joint Petition for Settlement on March 2, 2021. PGW now submits this Revised Statement in Support as directed by the Administrative Law Judge on March 3, 2021.

² See Joint Petition at 1.

PGW believes that the Settlement is in the best interests of PGW and its customers. The Settlement provides for the continuation of PGW’s Demand Side Management (“DSM”) Program as described in the DSM Implementation Plan for Fiscal Years 2021-2023 (“Implementation Plan”). PGW’s DSM Plan is voluntarily offered by the Company as a service to its customers. By continuing these programs, PGW will continue supporting the deployment of high efficiency natural gas equipment in order to provide PGW customers with the opportunity to reduce gas usage and associated costs, as well as supporting conservation and load management efforts in Philadelphia. These programs not only help program participants save money but they provide benefits to all PGW customers by reducing natural gas costs, reducing carbon emissions and improving load management.

The Settlement terms provide additional benefits specific to low-income customers as part of the DSM, as well as addressing concerns related to participation by small business customers. In addition to the DSM, PGW has a robust Universal Service Energy and Conservation Plan (“USECP”) which specifically focuses on energy conservation and cost reductions for low-income customers. The USECP includes PGW’s Low-Income Usage Reduction Program (“LIURP”), which is the largest natural gas low-income program in the Commonwealth (by multiple millions of dollars), and the second largest of the gas and electric low-income usage reduction programs in the Commonwealth.³ Providing, through this DSM Program, even more opportunities for PGW’s low-income customers to reduce their energy usage makes additional benefits available to the significant number of low-income customers in PGW’s service territory. With respect to customer assistance program (“CAP”) customers who participate in these new, voluntary programs, such

³ Pa. P.U.C. 2019 Report on Universal Service Programs and Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies, at 45-46, *available at* https://www.puc.pa.gov/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2019.pdf.

participation will benefit non-CAP customer by potentially lowering the costs of CAP. Accordingly, the proposed additional benefits to low-income customers as agreed to in this Settlement benefit the overall public interest. The Settlement was reached after the submission of testimony and after a series of negotiations concerning the issues raised by the Implementation Plan. It therefore represents a reasonable resolution of this proceeding, is in the public interest and should be approved expeditiously and without modification.⁴

I. BACKGROUND

On May 7, 2020, PGW filed its voluntary Demand Side Management Implementation Plan for Fiscal Years 2021-2023.⁵ The Implementation Plan described program budgets and implementation details that PGW will follow to implement its EnergySense Demand-Side Management Portfolio from September 1, 2020 to August 31, 2023. This filing was made in accordance with the Commission's November 1, 2016 Final Order in this docket (Docket No. P-2014-2459362) approving PGW's DSM Phase II Plan for Fiscal Years 2016 through 2020, including the provision authorizing the continuation of PGW's DSM programming beyond FY2020 through ongoing triennial update filings. The Implementation Plan became effective as of September 1, 2020. This proceeding was assigned to Administrative Law Judge F. Joseph Brady for hearings and issuance of a Recommended Decision.

⁴ See Joint Petition at ¶¶ 20-21.

⁵ PGW originally filed for approval of its initial DSM on March 26, 2009 which was in effect from September 1, 2010 through August 31, 2015. The DSM has been continuously operating since that time. Unlike the electric distribution companies, there are no statutory requirements for natural gas distribution companies like PGW to offer energy conservation programs. See, e.g., *2021 Total Resource Cost (TRC) Test*, Docket No. M-2019-3006868, Final Order entered December 19, 2019 at 10. (“[T]here are several key distinctions between EDC EE&C plans and NGDC EE&C plans. Most notably, there are not statutory requirements for NGDCs to achieve specific savings targets.”) The Commission has also recognized that PGW's DSM is a voluntary program. See *Petition of Philadelphia Gas Works for Approval of Demand Side Management Plan for FY 2016-2020*, Docket No. P-2014-2459362, Tentative Opinion and Order entered Aug. 4, 2016, at 70.

Formal and informal discovery was conducted during this proceeding. PGW submitted direct and rebuttal testimonies, and CAUSE-PA submitted direct and surrebuttal testimonies. None of the other parties submitted testimony. The active parties also engaged in discussions to try to achieve a settlement of some or all of the issues in this case. As a result of these negotiations, the Joint Petitioners were able to reach a Settlement on all issues as set forth in the Joint Petition. The evidentiary hearing scheduled for February 10, 2021 was canceled after the parties reported that a full settlement had been achieved.

II. THE SETTLEMENT IS IN THE PUBLIC INTEREST AND SHOULD BE APPROVED EXPEDITIOUSLY AND WITHOUT MODIFICATION

A. Standard of Review of Settlements

The Commission encourages parties in contested on-the-record proceedings to settle cases.⁶ Settlements eliminate the time, effort and expense the parties must expend litigating a case and at the same time conserves administrative resources. Such savings benefit not only the individual parties, but also the Commission and all ratepayers of a utility, who otherwise may have to bear the financial burden such litigation necessarily entails. The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding.⁷

The focus of inquiry for determining whether a proposed settlement should be recommended for approval is not a “burden of proof” standard, as is utilized for contested matters.⁸

⁶ See 52 Pa. Code § 5.231.

⁷ 52 Pa. Code § 69.401.

⁸ See, e.g., *PUC v. Borough of Schuylkill Haven Water Department*, Docket No. R-2015-2470184, et al., Opinion and Order entered Oct. 22, 2015 adopting the Recommended Decision dated Sept. 1, 2015 at 9-10, 2015 Pa. PUC LEXIS 422; *PUC v. City of Lancaster – Bureau of Water*, Docket Nos. R-2010-2179103, et al., Opinion and Order entered July 14, 2011, at 11; *Warner v. GTE North, Inc.*, Docket No. C-00902815, Opinion and Order entered April 1, 1996, 1996 Pa. PUC LEXIS 78.

Instead, the benchmark for determining the acceptability of a settlement or partial settlement is whether the proposed terms and conditions are in the public interest.⁹

By definition, a “settlement” reflects a compromise of the positions that the parties of interest have held, which arguably fosters and promotes the public interest. When active parties in a proceeding reach a settlement, the principal issue for Commission consideration is whether the agreement reached suits the public interest.¹⁰ In their supporting statements, the Joint Petitioners conclude, after discovery and discussion, that this Settlement resolves all issues in this case, fairly balances the interests of the Company and its ratepayers, is in the public interest, and is consistent with the requirements of the Public Utility Code.

Not every issue was of equal concern to every Joint Petitioner. Accordingly, each of the Joint Petitioners’ statements in support does not necessarily address each and every aspect of the Settlement.

B. Implementation Plan for Fiscal Years 2021-2023

The Settlement avoids further litigation on the DSM Program through FY 2023 as described in the Implementation Plan and as modified by the Settlement. The DSM Program is in the public interest as it provides a host of benefits to both participating customers and PGW customers as a whole. By supporting the deployment of high efficiency natural gas equipment, the program provides PGW customers with reductions in natural gas usage and associated costs, and also supports conservation and load management efforts in Philadelphia. The DSM Program makes high efficiency natural gas equipment more accessible to customers by reducing up-front

⁹ *Id.*; see also *PUC v. Allied Utility Services, Inc.*, Docket No. R-2015-2479955, et al., Opinion and Order entered April 7, 2016 adopting the Recommended Decision dated Feb. 26, 2016 at 8, 2016 Pa. PUC LEXIS 73.

¹⁰ *See, e.g., PUC v. York Water Co.*, Docket No. R-00049165, Opinion and Order entered Oct. 4, 2004 adopting the Recommended Decision dated Aug. 30, 2004.

costs of installing this equipment, and thereby helps reduce customer bills, reduce carbon emissions, and improve load management. Approval of the Implementation Plan and the Settlement will result in continued financial and customer satisfaction benefits for PGW's customers, while providing economic and environmental benefits for PGW ratepayers.

The DSM Program's approved overall budget for FY 2021 to FY 2023 is approximately \$7.1 million,¹¹ but is projected to result in a net benefit of \$11.4 million with a benefit-cost ratio of 2.10.¹² This indicates that the Program will provide significant benefits in excess of the costs to PGW customers. The program is also projected to provide natural gas savings of 169,517 MMBtu in FY 2021-2023, and lifetime natural gas savings of nearly three million MMBtu over the life of the measures installed as part of the program.¹³ The measures will result in savings to electricity and water usage as well.¹⁴ While the voluntary DSM Program is limited in scope and therefore can provide direct benefits to only a subset of PGW's 500,000 customers, it nonetheless provides reasonable benefits to both participating customers and PGW's customers as a whole.

For these reasons, the DSM Program is in the public interest, and continuation of these programs pursuant to the Implementation Plan and the Settlement is also in the public interest. Therefore, the Settlement should be approved without modification.

¹¹ Implementation Plan at 7, Table 1. (Note that figures may be updated in the updated plan that will be filed after the Commission issues a final Order.)

¹² Implementation Plan at 9, Table 8. (Note that figures may be updated in the updated plan that will be filed after the Commission issues a final Order.)

¹³ Implementation Plan at 8, Tables 3 and 4. (Note that figures may be updated in the updated plan that will be filed after the Commission issues a final Order.)

¹⁴ Implementation Plan at 8-9, Tables 5-7. (Note that figures may be updated in the updated plan that will be filed after the Commission issues a final Order.)

C. Low-Income Programming

In addition to PGW's robust Universal Service and Energy Conservation Plan, which includes a significantly funded weather conservation programs for low-income customers¹⁵ and which is considered in PGW's Universal Service Plan proceeding, as well as changes included in the originally filed Implementation Plan which would increase incentives among all customers, including low-income customers,¹⁶ PGW has agreed as part of the Settlement to provide additional benefits specific to low-income customers as part of its voluntary DSM Program.¹⁷ These benefits will provide free smart thermostats to low-income customers, as well as increased incentive rebates for low-income customers installing certain energy efficient equipment in their homes. The Settlement also provides for additional reporting on low-income participation in these programs as part of PGW's Annual Reports regarding the DSM Program.

1. Low-Income Smart Thermostats

Under the Settlement, PGW will provide low-income customers with a smart thermostat at no cost.¹⁸ In implementing this program, PGW will work with one or more vendors to determine participant eligibility and conduct outreach to underserved populations, including those for whom English is not the primary language when possible.¹⁹ When installing the thermostat, the vendor(s)

¹⁵ See PGW St. No. 1-R at 4-8.

¹⁶ PGW's new programs are being made available to low-income customers. A goal of PGW's marketing strategy for DSM has been to increase awareness of available incentives across the full spectrum of PGW classes and the move toward a more prescriptive model for DSM to increase access to incentives among all customers, including low-income homeowners and affordable housing providers. See PGW St. No. 1-R at 26-27.

¹⁷ As more fully explained in the Rebuttal Testimony of Denise Adamucci, PGW's Low Income Usage Reduction program ("LIURP") was a part of PGW's initial voluntary DSM plan but removed by the Commission and became a part of PGW's USECP starting in 2017. PGW St. No. 1-R at 11-16.

¹⁸ Joint Petition at ¶ 13.

¹⁹ Joint Petition at ¶ 13(a).

will also educate customers on how to use the smart thermostat and how to achieve savings using the thermostat.²⁰ The \$60,000 annual budget for this program will be part of the existing overall budget for the Residential Equipment Rebate Program.²¹ PGW anticipates serving between 363 to 600 customers, depending on the cost of the thermostats and whether the thermostat is installed by the vendor or the individual customer.²²

PGW's original Implementation Plan offers rebate-discounted ENERGY STAR certified smart thermostats to eligible PGW customers, including residential (regardless of household income) and commercial customers.²³ The Implementation Plan projected that the program would incentivize the installation of 6,625 thermostats in the FY 2021 to FY 2023 period (or 2,072 to 2,277 thermostats per year). Overall, the Smart Thermostat program is projected to reduce energy use and costs to customers in the program by approximately 6.4% to 11.5% compared to manual or conventional programmable thermostats.²⁴ The program will also produce benefits for all PGW gas customers, with annualized gas savings of 34,089 MMBtu.²⁵

As part of the Settlement, 363 to 600 smart thermostats will be provided at no cost to low-income customers. Low-income customers remain eligible to receive the rebate-discounted smart thermostats, but the free smart thermostats will increase accessibility of this measure for low-income customers. As noted above, smart thermostats are projected to provide savings of 6.4% to

²⁰ *Id.*

²¹ Joint Petition at ¶ 13(b).

²² *Id.*

²³ Implementation Plan at 23. Low-income customers are eligible to receive the discounted smart thermostats as part of the original Implementation Plan.

²⁴ Implementation Plan, Appendix D, Technical Reference Manual at 6.

²⁵ Implementation Plan at 23.

11.5% of heating costs,²⁶ which can be expected to be particularly impactful for this group of customers. With the Settlement modification, approximately 14% to 21% of the smart thermostats provided each year under the program will be specifically allocated to be provided for free to low-income customers. This is on top of any low-income customer participation in the rebate-discounted program. Additionally, the DSM Program itself is designed to provide energy savings opportunities more broadly to all PGW's customer classes (though some programs are available to all residential customers, including low-income customers) while PGW's USECP offers a variety of other benefits specifically for low-income customers including: (1) the Home Comfort Program, PGW's LIURP program which provides free, in-home weatherization and energy conservation and education for eligible, high use single-family low-income customers; and (2) the Low Income Multi-family Efficiency ("LIME") pilot program which provides weatherization and energy conservation and education for multi-family properties

The Settlement terms provide additional benefits for low-income customers by providing free smart thermostats, which will help manage their gas usage and decrease their bills, particularly during the heating season. Incorporating the Settlement terms into the DSM expands the opportunity for low-income customers to participate. Reduced energy usage lowers costs for both the low-income consumers and those who pay for the costs of the low-income programs. This supports the public interest and should be approved without modification.

2. Increased Equipment Rebate Incentives for Low-Income Customers

The Settlement also provides for low-income customers to be provided with higher rebate incentives to replace certain equipment in their homes with more efficient units.²⁷ Customers

²⁶ Implementation Plan, Appendix D, Technical Reference Manual at 6.

²⁷ Joint Petition at ¶ 17.

eligible for these increased incentives include those have been enrolled with PGW’s Customer Responsibility Program within the last year, have received a Utility Emergency Services Fund (“UESF”) grant in the last year, or have received LIHEAP funds that have been assigned to PGW within the last year.²⁸ This program will also include nonprofits and affordable housing agencies that are installing these units in the homes of low-income customers.²⁹ PGW will award the increased incentives for the first 400 pieces of equipment to be approved per year, and eligible equipment includes residential furnaces, residential boilers, combi-boilers, and tankless water heaters.³⁰ The table included in Paragraph 17 of the Joint Petition describes the enhanced rebate incentives available to low-income customers, which in some instances covers an amount equal to or near 100% of the unit’s incremental cost.

The Settlement terms add to the Residential Equipment Rebates (“RER”) Program described in the Implementation Plan, which provides rebates on high efficiency gas appliances and heating equipment.³¹ The original rebates are available to all firm-rate PGW customers, including low-income customers.³² The RER Program originally aimed to issue rebates for 4,310 pieces of equipment from FY 2021 to FY 2023 with each covering from 50% to 75% of the incremental cost between standard efficiency and high efficiency equipment models for customers, and producing annualized gas savings of 50,297 MMBtu.³³ The average customer is projected to

²⁸ *Id.*

²⁹ *Id.*

³⁰ *Id.*

³¹ Implementation Plan at 15-17.

³² Implementation Plan at 16.

³³ Implementation Plan at 15.

save \$250 on heating costs annually from the purchase of high efficiency equipment. The Settlement terms will provide increased rebate amounts under this program specifically for low-income customers. This is in the public interest as it can be expected to make this high efficiency equipment more accessible to low-income customers, and will help participants reduce their natural gas usage and thus reduce their bills. Providing 400 increased incentives to low-income customers per year will result in approximately 39% of rebates being awarded in FY 2022 and FY 2023 as increased incentive rebates to low-income customers under this program, in addition to low-income participants in the original program.³⁴

3. Annual Reports

As part of the Settlement, PGW will provide reporting on participation in the low-income thermostat program and low-income equipment rebates as part of its Annual Reports, including a variety of specific data points.³⁵ Three months prior to filing any extension, revision or new DSM Plan, PGW will hold a collaborative to discuss participation rates in these programs and potential modifications, as well as provide additional data regarding customer participation.³⁶ These additional reporting requirements will allow the interested parties and the Commission to gain additional understanding of how the programs are being implemented and identify the customers who have received benefits.

³⁴ Under the Settlement terms, PGW projects that it will provide an estimated 1,013 RER rebates per year in FY 2022 and FY 2023 (Implementation Plan at 17) with up to 400 of those being provided as increased incentives to qualifying low-income customers.

In the past, PGW has awarded an average of 615 rebates per year. PGW expects higher participating in the current phase of the DSM Program, which includes more rebate offerings.

³⁵ Joint Petition at ¶¶ 13(c); 17; 18.

³⁶ Joint Petition at ¶ 19.

PGW will also convene a stakeholder meeting to discuss implementation concerns related to the COVID-19 pandemic.³⁷ PGW will commit to holding this stakeholder meeting within 30 days of receiving a final Order in this proceeding.

In sum, PGW submits that these terms are in the public interest because they will provide additional benefits to low-income customers. The Settlement would allow hundreds of low-income customers to access smart thermostats and other efficient equipment to help them conserve energy and better manage their natural gas bills, which is particularly important at a time when many customers have been affected by the COVID-19 pandemic. PGW submits that the Settlement's low-income additions are in the public interest and should be approved without modification.

C. Small Business Participation

The Settlement also includes terms related to small business participation in the DSM programming. These terms address concerns raised by OSBA, and seek to ensure that small business customers receive benefits from the DSM program that are commensurate with small business' funding of the programs, and to ensure that program budgets are appropriately limited and that costs do not outweigh the benefits of the programs. Through the Settlement, PGW committed to maintaining incentive spending for the Commercial Equipment Rebate ("CER") Program below 55% of the Total Resource Cost during FY 2021-2023, and will report on this in its FY 2023 Annual Report.³⁸ This will ensure that the program benefits outweigh the costs and that small business customers continue to benefit from the program. PGW will also work to provide CER benefits to small business customers that are reasonably commensurate to small businesses'

³⁷ Joint Petition at ¶ 12.

³⁸ Joint Petition at ¶ 14.

share of the GS-Commercial Class load.³⁹ The Annual Reports will also provide data on small business participation in the CER Program.⁴⁰ Finally, total spending on the CER Program in FY 2021 to FY 2023 will not exceed its budget by more than 15%.⁴¹

PGW submits that these terms are in the public interest. This settlement language will help ensure that small businesses benefit from the DSM programming and that budgets for these programs are appropriately maintained. Additionally, reporting on total spending and small business participation rates will allow the interested parties to assess the success of these programs. Therefore, the Settlement terms are in the public interest and should be approved without modification.

³⁹ Joint Petition at ¶ 15.

⁴⁰ *Id.*

⁴¹ Joint Petition at ¶ 16.

III. CONCLUSION

The Settlement represents a reasonable resolution of all issues raised by the active parties in this proceeding. Its terms are in the public interest and modifies PGW's originally submitted Plan in ways that will enhance the meaningful benefits that will be delivered to PGW's customers and particularly low income customers. The Settlement also reduces the administrative burden on the Commission and the litigation costs of all of the active parties. Accordingly, for the reasons set forth above and in the Joint Petition, PGW submits that the Settlement is in the public interest and should be approved without modification.

Therefore, PGW respectfully requests that the ALJ and the Commission expeditiously review and approve the Settlement without modification, and take any other action deemed to be in the public interest.

Respectfully submitted,



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Dated: March 10, 2021

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