

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for	:	
Approval of Demand-Side Management	:	Docket No. P-2014-2459362
Plan for FY 2016-2020	:	
	:	
and	:	
	:	
Philadelphia Gas Works Universal Service	:	
and Energy Conservation Plan for 2014-	:	
2016 52 Pa Code § 62.4 – Request for	:	
Waivers	:	

**Pre-Hearing Memorandum of Tenant Union Representative Network and
Action Alliance of Senior Citizens of Greater Philadelphia**

Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (collectively, TURN *et al.*), through counsel Community Legal Services, Inc., hereby submit the following Pre-Hearing Memorandum pursuant to the Prehearing Conference Order of February 5, 2015.

History of the Proceeding

On December 23, 2014, Philadelphia Gas Works (“PGW”) filed its Petition for Approval of Demand-Side Management Plan for FY 2016-2020 (Petition). The Petition proposes several changes to be introduced in PGW’s second Demand-Side Management Plan for the five years beginning September 1, 2015 (DSM Phase II Plan). The Petition proposes:

- Reduced spending for PGW’s existing DSM programs in the DSM Phase II Plan;
- Elimination of PGW’s Home Rebates program;
- The addition of two new programs, the Low-Income Multifamily Program and the Efficient Fuel-Switching Program in the DSM Phase II Plan; and

- Two new cost elements in the DSM Phase II Plan: a conservation adjustment mechanism, and performance incentives.

On January 13, 2015, TURN et al. filed a Petition to Intervene in the DSM Phase II Plan proceeding.

On February 5, 2015, the Commission issued a Prehearing Conference Order directing counsel to submit prehearing memorandum on or before noon on Friday, February 13, 2015.

1. Proposed Plan and Schedule of Discovery

TURN et al. are willing to participate in discussions with the parties regarding a reasonable schedule for discovery. The schedule should provide adequate time and opportunity for a thorough analysis of the DSM Phase II Plan.

2. Possibility of Settlement

TURN et al. are willing to participate in settlement negotiations concerning all issues raised by this case.

3. Issues to be Presented

PGW's Petition proposes a reduction in spending for PGW's Demand-Side Management programs, including a reduction in spending for PGW's CRP Home Comfort program (a component of PGW's "universal service and energy conservation" programs (USEC), formerly referred to as ELIRP), which provides weatherization treatments to the highest usage customers in PGW's Customer Assistance Program, the Customer Responsibility Program (CRP). TURN et al. intend to examine several issues, including, but not limited to:

- PGW's proposed reduction in CRP Home Comfort spending, and the purported basis therefor, as well as alternatives to reduced spending on that USEC program;

- How PGW will incorporate multifamily weatherization as a USEC component of DSM, as ordered by the Commission;
- PGW's proposals to phase out its Home Rebates program, which provides incentives to single-family residential customers for implementing conservation projects in their homes; and
- PGW's two new cost elements, a conservation adjustment mechanism and performance incentives.

TURN et al. reserve the right to raise other issues that may arise in the course of this proceeding.

4. Amount of Hearing Time Needed

At this time, because the parties are engaged in preliminary discovery and discussions pursuant of PGW's DSM Phase II Plan pursuant to PGW's proposed collaborative procedure (Petition at ¶53), it is not possible to estimate the amount of hearing time that will be needed in the event PGW's proposed collaborative procedure is unsuccessful and an on-the-record proceeding is commenced.

5. Witnesses

At this time, TURN et al. do not intend to present a witness. TURN et al. reserve the option to call witnesses as appropriate to reply to other parties' testimony.

6. Schedule for submission of testimony, hearings and briefs

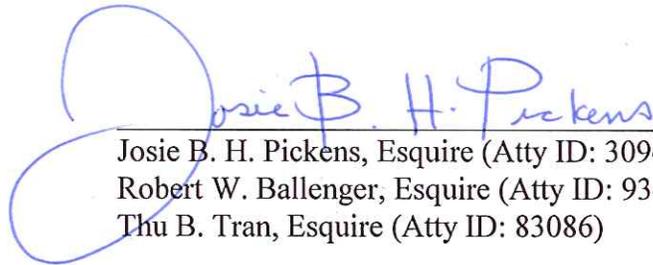
TURN et al. are willing to participate in discussions with the parties regarding a reasonable schedule for submission of testimony, hearings and briefs.

Service on TURN et al.

TURN et al. will be represented in this case by Josie B. H. Pickens, Esquire, Robert W. Ballenger, Esquire, and Thu B. Tran, Esquire, who will accept electronic delivery of documents. One hard copy of all documents should also follow by first class mail to TURN et al. as follows:

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Respectfully submitted,



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February 13, 2015