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August 16, 2016

**Via Electronic Filing**

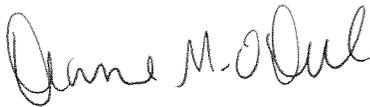
Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

Re: Petition of Philadelphia Gas Works for Approval of Demand Side Management 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 – Docket No. P-2014-2459362

Dear Secretary Chiavetta:

On August 15, 2016, we filed on behalf of Philadelphia Gas Works' ("PGW") its Comments with regard to the above-referenced matter. We found a typographical error on page 6, n 21. Enclosed is a corrected page 6. Please remove page 6 from the original filing and replace with this corrected page 6. Copies of the corrected page 6 to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell  
DMO/lww  
Enclosure

cc: Hon. Christopher Pell w/enc.  
Hon. Marta Guhl w/enc.  
Cert. of Service w/enc.

average cost per job to determine the first step of the Commission's calculation.<sup>17</sup> In its calculations, the Commission utilizes 71,625 as the Total LIURP Eligible Customers for PGW.<sup>18</sup> As explained more fully below, PGW respectfully requests that the Commission replace this number with the more updated number of 35,000 provided in the record of this proceeding<sup>19</sup> and consistent with PGW's most recently filed Universal Service and Energy Conservation Plan 2017-2020 ("PGW 2017-2020 USECP").<sup>20</sup> Alternatively, the Commission could replace this number the most current number of CRP customers as of June 30, 2016 who have not yet received LIURP weatherization treatments.<sup>21</sup> Though not PGW's preferred revision, at least this alternate number utilizes accurate, updated information and is calculated consistent with the number relied upon by the Commission in its Tentative Order.

**(a) Utilizing 35,000 as the Total Number of Eligible Customers**

PGW recognizes that replacing the Total Number of Eligible Customers used for PGW with 35,000 is less than that proposed by the Commission and would result in a nominal downward adjustment of the calculation of PGW's LIURP budget. However, there are several sound reasons to make this adjustment.

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<sup>17</sup> Tentative Order at 66. PGW Total LIURP Eligible Customers (71,625) \* state average job completion rate (2.5%) = 1,790.625 jobs. 1,790.625 jobs \* PGW average cost per job (\$3,605) = \$6,455,203.

<sup>18</sup> Tentative Order at 67.

<sup>19</sup> PGW Exh. TML-4 (Phase II: Five-Year Implementation Plan dated December 2014, revised April 16, 2015) at 88. The number was updated through June 2014 and factored in the application of usage requirements that had not been applied to the outdated 71,625 number provided in the 2014-2016 USECP.

<sup>20</sup> Philadelphia Gas Works Universal Service and Energy Conservation Plan 2017-2010, Docket No. M-2016-2542415 dated May 1, 2016 at 12 ("PGW 2017-2020 USECP")

<sup>21</sup> The ALJ Recommended Decision determined that LIURP participation should not be expanded to include customers who are not participants in CRP. RD at 139-140. The Commission affirmed this decision.

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's Corrected Page 6 to Comments upon the parties and persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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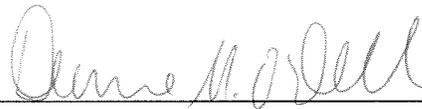
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Date: August 16, 2016