



118 Locust Street
Harrisburg PA, 17101

PULP

PENNSYLVANIA
UTILITY LAW PROJECT

March 22, 2017

Via Electronic Filing

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

Re: Philadelphia Gas Works Universal Service Plan for 2017-2020 Submitted in Compliance with 52 Pa. Code § 62.4, Docket No. M-2016-2542415

CAUSE-PA Letter in Lieu of Reply Comments

Dear Secretary Chiavetta,

Please be advised that the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) will not be filing Reply Comments in this proceeding (Docket No. M-2016-2542415). CAUSE-PA notes that its Comments, dated March 7, 2017, are fundamentally consistent with the Comments of the Office of Consumer Advocate (OCA) and the Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (TURN *et al.*). We further note that CAUSE-PA is unable to offer any additional analysis or recommendations with respect to the many outstanding issues identified in its initial Comments because PGW has not responded to CAUSE-PA's request for information. As such, CAUSE-PA stands by its initial Comments and its position with regard to PGW's failure to respond to CAUSE-PA's March 2, 2017 Information Request, which was fully explained in CAUSE-PA's March 22, 2017 Letter to the Commission.

Sincerely,

Elizabeth R. Marx, Esq.
Patrick M. Cicero, Esq.
The Pennsylvania Utility Law Project
Counsel for CAUSE-PA

CC: Certificate of Service
Sarah Dewey, sdewey@pa.gov
Joseph Magee, jmagee@pa.gov
Louise Fink-Smith, Esq., finksmith@pa.gov

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Philadelphia Gas Works Universal Service and :
Energy Conservation Plan for 2017-2020 :
Submitted in Compliance with : Docket No. M-2016-2542415
52 Pa. Code § 62.4 :
:

Certificate of Service

I hereby certify that I have this day served copies of CAUSE-PA’s Letter in Lieu of Reply Comments in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

VIA FIRST CLASS MAIL AND/OR EMAIL

Daniel Clearfield, Esq.
Deanne O’Dell, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market St.
8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
dodell@eckertseamans.com

Brandon J. Pierce, Esq.
Philadelphia Gas Works
800 West Montgomery Ave.
Philadelphia, PA 19122
brandon.pierce@pgworks.com

Christy M. Appleby, Esq.
Darryl Lawrence, Esq.
Office of Consumer Advocate
5th Floor, Forum Place Building
555 Walnut Street
Harrisburg, PA 17101-1921
cappleby@paoca.org
dlawrence@paoca.org

Josie B.H. Pickens, Esq.
Robert W. Ballenger, Esq.
Jenna Collins, Esq.
Community Legal Services, Inc.
North Philadelphia Law Center
1410 West Erie Ave
Philadelphia, PA 19102
jpickens@clsphila.org
rballenger@clsphila.org
jcollins@clsphila.org

Sharon Webb, Esq.
Office of Small Business Advocate
Commerce Building, Suite 202
300 North 2nd Street
Harrisburg, PA 17101
swebb@state.pa.us

Charis Mincavage, Esq.
McNees, Wallace, and Nurick
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
cmincava@mwn.com

Joseph Minott, Esq.
Logan Welde, Esq.
Clean Air Council of Philadelphia
135 South 19th Street
Suite 300
Philadelphia, PA 19103
joe_minott@cleanair.org
lwelde@cleanair.org
email only, as requested by party

Richard Kanaskie, Esq.
Gina Miller, Esq.
Carrie Wright, Esq.
Bureau of Investigation and Enforcement
Pa Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
rkanaskie@pa.gov
ginlauffer@pa.gov
carwright@pa.gov

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



Elizabeth R. Marx, PA ID # 309104
118 Locust Street
Harrisburg, PA 17101
717-236-9486
pulp@palegalaid.net

March 22, 2017