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August 15, 2023

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**RE: Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2024-2026; 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 ("PUC" or "Commission") is the Prehearing Memorandum on behalf of the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Charis Mincavage'.

Charis Mincavage
MCNEES WALLACE & NURICK LLC

Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

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

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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Charis Mincavage

Counsel to the Philadelphia Industrial and
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Dated this 15th day of August, 2023, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for	:	
Approval of Demand-Side Management	:	
Plan for FY 2024-2026	:	
	:	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	:	

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

Pursuant to the August 3, 2023, Prehearing Conference Order issued by Administrative Law Judge ("ALJ") F. Joseph Brady, 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 June 16, 2023, Philadelphia Gas Works ("PGW" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") its Demand-Side Management Program Implementation Plan for Fiscal Years 2024-2026, which details the program budgets and implementation of PGW's EnergySense Demand-Side Management Portfolio from September 1, 2023, through August 31, 2026 ("FY24-26 Plan"). Through the FY24-26 Plan, PGW proposed seven programs comprising its EnergySense Portfolio.

On July 27, 2023, PGW filed a letter proposing to delay implementation of the FY24-26 Plan and, instead, maintain its currently effective Plan ("FY21-23 Plan") until the Commission approves implementation of the FY24-26 Plan.

On August 14, 2023, PICGUG filed a Petition to Intervene in this proceeding. A description of PICGUG is set forth in Paragraph 4 of its Petition to Intervene. PICGUG's Petition to Intervene is pending and awaits disposition by the ALJ.

A Prehearing Conference has been scheduled in this proceeding for August 16, 2023.

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 anticipates pursuing these issues during this proceeding, as necessary, and reserves the right to raise further issues and to respond to matters raised by other parties.

III. PROPOSED WITNESSES

PICGUG is currently evaluating whether it will sponsor testimony in this proceeding. If PICGUG opts to sponsor testimony, PICGUG will immediately inform the ALJ and the parties of any intended witnesses and their areas of testimony. PICGUG also 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, including the amount of hearing time needed.

PICGUG will also cooperate with the ALJ and the parties to develop appropriate discovery rules in accordance with the Commission's regulations and any ALJ directives.

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: August 15, 2023