PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Philadelphia Gas Works' Response to the 2026 PAPUC Winter Reliability Data Request

The following is Philadelphia Gas Works' ("PGW" or the "Company") response to the 2026 Pennsylvania Public Utility Commission's ("Commission") Winter Reliability Data Request. The text of the Commission's Data Request is below. It is followed by PGW's response in the next section.

1. Winter Readiness

Provide a summary of your company's winter preventative maintenance program(s) which directly facilitates safe and reliable service to customers, including on-system electric generation customers, over the heating season. Provide a description of any potential best practices including any new leak detection programs.

2. Employee Safety/Readiness

Provide a description of any procedures and/or training protocols your company uses to ensure personnel are adequately prepared and staffed for the heating season. Also, Provide a summary of your organization's participation in emergency preparedness exercises over the past 12 months, whether internal or with external stakeholders. Describe the general scenarios simulated.

3. Communications Outreach

Provide a summary of the communications procedures your company has in place to effectively manage potential crisis events during the heating season. Include a description of outreach activities and any exercises done with local and regional emergency management organizations to coordinate emergency response procedures.

4. Gas Supply and Planning

Describe the methods and protocols your company uses to ensure reliable gas delivery at least cost during the heating season. Include how your company plans to manage peak demand days, capacity planning, interstate supply coordination, storage, curtailment, and weather forecasting. Provide a description of any best practices, including communications and coordination with natural gas suppliers and interruptible service customers on your system ahead of anticipated peak usage.

5. Natural Gas Demand from Electric Generators

Provide your company's view on any potential concerns about fuel availability over the winter heating season given the increased demand for natural gas as an electric generation fuel source and possible increased use of firm gas transportation service, including future competition for gas supplies between your company and natural gas fired electric generators not served by the NGDC and any concerns on the potential for increased demand for gas from electric generators served behind the city-gate of the NGDC. Include any new protocols or plans your company may have in place to manage this new dynamic.

PGW'S RESPONSE:

1. Winter Readiness

PGW submits the following summary of its winter preventive maintenance programs in response to the 2026 PUC Winter Reliability Data Request. The programs summarized below directly facilitate safe and reliable service during the heating season.

- The PGW Gas Processing Department's Preventative Maintenance Program ("PMP") uses a Work Management System to ensure that all process heaters, boilers, vaporizers, valves, safeties, and auxiliary systems are inspected, calibrated, and tested before being put into service for winter operations at PGW's LNG gas plants. Using the PMP, PGW manages resources to ensure that they will provide safe reliable service during the winter months.

- The Gas Processing Department maintains an Emergency Snow Plan. The Gas Emergency Snow Plan coordinates decision making and personnel for the Richmond and Passyunk LNG plants under the direction of a Snow Emergency Coordinator. Its purpose is to minimize the effects of heavy snowfall on plant operations.

- The Gas Processing Department conducts readiness testing on the vaporizers at the Richmond and Passyunk LNG plants in preparation for winter operations.

- The Winter Load Operating Group ("WLOG") meets periodically throughout the year to review design hour load requirements for the high-pressure distribution system. The WLOG reviews plans for various operating scenarios including maximum load or system failure scenarios. The WLOG makes contingency plans to meet customer load requirements for the various system failure scenarios. The WLOG also reviews and discusses any changes made during the year to the distribution system.

- With respect to winter weather and forecasting, PGW receives a 5-week forecast that is updated weekly and a 7-day forecast that is updated 3 times daily.

- PGW's Field Operations Winter Operating Procedure is a five-phase Emergency Response and Manpower Allocation plan that directs allocation of available resources, field crew assignments, and field service technicians to maximize the efficient use of all resources to meet the 24-hour a day, 7-day a week distribution system maintenance and reliability demands. Field Operations management staff meets on a

weekly basis, as well as when needed, to review and discuss the Field Operations Department's manpower allocation requirements.

- PGW has a robust, in-house, fully staffed Damage Prevention program that continues its operation throughout the winter.

- PGW has an industry best-practice Leak Survey program in place that is supplemented by additional survey programs during the winter months (See attached Distribution Department Bulletin #127). Starting on December 1st and continuing through March 31st of each winter season, PGW performs a general winter patrol survey by conducting mobile leakage surveys of all areas of the distribution system in which there is high concentration of cast iron main. PGW also performs a prudent winter Frost Patrol by surveying the top 600 city blocks ranked by the Main Replacement Prioritization ("MRP") software once in December and then every twenty working days following a "Frost event".

- PGW's Fleet Operations Department activates its protocol for installing snow chains/cables on specified emergency response and other vehicles once snow is predicted to accumulate to four or more inches.

- PGW's Fleet Operations Department has a mandatory winter detail schedule for PGW's Fleet mechanics that goes into effect December 5th through March 31st, which provides coverage 24/7 to support all PGW departments that use PGW vehicles.

Information regarding on-system electric generation customers can be found in our response to question number 5.

2. Employee Safety/Readiness

Below is a brief description of procedures and training that PGW uses to ensure that its personnel are adequately prepared and the enterprise is adequately staffed for the heating season.

- **Field Personnel Safety —** Prior to the heating season, PGW conducts all-day annual training and safety schools for all Distribution field employees focusing on worker and public safety policies and procedures.

- **Emergency Dispatch —** PGW has a five-phase Emergency Response and Manpower Allocation plan which assures proper allocation of resources, staff, field service technicians, and work crews to meet the 24-hour a day, 7-day a week distribution system demands and maintenance requirements during the Winter period.

- **Gas Processing Department Personnel Training —** Gas Processing personnel are trained initially upon hire and then given re-fresher training annually for PGW safety protocols. There also is training throughout the year to comply with CFR 192 and 193.

- **Customer Service Representative ("CSR") Refresher Training —** PGW's Customer Affairs Department conducts the following initial and annual refresher training for its frontline staff who operate the PGW Call Center:

    - **Emergency Training —** This annual refresher training reviews the proper procedure for managing leak and emergency calls and how and when to issue trouble orders to Field Operations.

    - **Customer Responsibility Program ("CRP") —** This training entails staff being refreshed on when and how to enroll a customer into PGW's low-income program, the Customer Responsibility Program. CRP provides customers with a consistent, discounted bill each month to help them better afford their gas bills and keep their gas service on.

- **High Bill Refresher Training —** To prepare for the heating season, CSRs are refreshed on how to properly review usage patterns and explain customer billing.

- **Payment Arrangement Refresher Training**- This annual training refreshes CSRs on how to determine the most appropriate restoration and payment arrangement terms for customers.

- **A summary of PGW's participation in emergency preparedness exercises**

  -

  - A tabletop exercise was conducted in April 2026 at PGW with participation from the Philadelphia Police Department, the Fire Department, and the City's Office of Emergency Management. The scenario focused on an emergency situation at a major sporting event. The purpose of the exercise was to validate PGW's procedures for responding to a large-scale incident and to confirm how coordination with the City's first responders would operate in preparation for the Semiquincentennial events scheduled for June and July 2026.

  -

  - A tabletop review of the Peak Winter Operations Leak Classification Procedure is performed each year to simulate extreme winter weather conditions and the processes and procedures used to safely utilize Field Operations' manpower and resources throughout the emergency period.

  - The emergency shut down of a Distribution main is explained during Distribution Department Annual Safety School utilizing "grease-off" equipment. This technique may generally be required to promptly stop gas flow due to large fires, washouts, main undermined, excavation damage events, or explosions.

- Each year PGW participates in the City of Philadelphia Office of Emergency Management "Winter Weather Preparedness Workshop".

3. Communications Outreach

Following is a summary of the communication procedures that PGW has in place to effectively manage potential crisis events during the heating season. It includes a description of outreach activities and any exercises done with local and regional emergency management organizations to coordinate emergency response procedures.

- **In the event of an emergency —** PGW makes communication a priority and activates its Crisis Communications Plan, which includes:
  - Notifying key personnel that a potential crisis is in effect, assigning short-term tasks and setting up an initial briefing session;
  - Assigning trained personnel to gather and share relevant information with employees, customers and additional audiences via the appropriate internal and external communications channels;
  - Working collaboratively and effectively through PGW's Corporate Communications & External Affairs and various PGW operating departments via well-defined roles and responsibilities to identify available and needed resources, and utilize the same;
  - Assigning personnel to communicate the variety of communication options through which internal and external audiences can gather information from PGW, share information with PGW and report their concerns to PGW;

- Monitoring the coordination and content of all communications activities with internal and external audiences by the communications team;
- Sharing information with audiences on how PGW is responding to the potential crisis, as warranted;
- Utilizing relationships with local officials, community groups and other entities to share information at the community level;
- Postponing planned communications activities to ensure that our communications channels are devoted to the potential crisis and available to audiences.

- **Additional Emergency Communications —** Communications staff are available 24 hours a day to respond to media inquiries. State legislators and city council members in our service territory receive correspondence along with email follow-up in the event of an emergency. The company's External Affairs Team meets with elected officials and attends community events throughout the city of Philadelphia to share outreach messages on a routine basis.

- **Customer Communications —** Every PGW customer receives our monthly informational bill newsletter, *The Good Gas News,* which shares important safety information and contact numbers. *The Good Gas News* newsletter is also posted on the company website www.pgworks.com each month and delivered electronically to e-bill customers. Our website also features a dedicated section titled "Safety & Reliability" that features gas leak safety information, weatherization tools and instructions on how to contact PGW in the event of an emergency (also available in approximately 60 foreign languages). The home page of the website can also post important customer messages, when necessary.

- **Philadelphia Resident Emergency Communications —** In the event of an emergency, PGW makes communication a priority by offering a variety of communication options

to customers and Philadelphia residents. Customers can contact the Customer Call Center and the automated Interactive Voice Response (IVR) phone system to report an odor or suspicion of a gas leak 24 hours a day, 7 days a week.

- **Employee Communications —** PGW uses a mobile and computer-based notification system which allows PGW to contact all employees quickly and efficiently with a consistent message. This notification system can contact employees at home, work, by text message, cell phone or through email.

- **First Responder Communications —** PGW works with and communicates closely with the Philadelphia Fire Department and Philadelphia Police Department on training and response procedures surrounding the response to emergency gas leaks, water main breaks, Carbon Monoxide alarms, Fire and "Foreign" Odor reports.

- **Emergency Management Outreach and Exercise Activities —** PGW assists the Philadelphia Office of Emergency Management ("OEM") with both their Excessive Heat and Severe Winter Weather response plans and coordinates with OEM on evacuation planning. PGW has a representative working with the City of Philadelphia Critical Infrastructure Working Group. PGW also attends the Delaware Valley Intelligence Center's ("DVIC") briefings and receives real time updates from the DVIC as needed. PGW works closely with and participates in exercises with the U.S. Department of Homeland Security Protective Services Division on several major events.

- **PUC-Mandated Cold Weather Survey —** Each October, PGW began conducting its annual Cold Weather Survey. The annual Cold Weather Survey consists of PGW surveying all residential customers whose gas service was terminated during the year, and the service is still off. As part of this survey, PGW makes four attempts (including one in person visit by a PGW contractor) to provide terminated customers with information on how they can restore their service. PGW also surveys how the affected customers plan on heating their homes during the winter season. The survey results

are then gathered and submitted to the PUC no later than December 15th. A resurvey is also conducted the following January.

LIHEAP and CRISIS Outreach — Each year PGW conducts various forms of outreach to customers who may qualify to receive LIHEAP and/or CRISIS grants.

4. Gas Supply and Planning

Below is a description of methods and protocols that PGW uses to ensure reliable natural gas delivery at least cost during the heating season. Descriptions of methods to manage peak demand days, capacity planning and interstate supply coordination, storage, curtailment and weather forecasting are included.

- ***Peak Design Day Evaluation —*** PGW models project customer gas requirements for a design (coldest) hour, design day and design winter. These gas requirements form the basis for capacity commitments for pipeline supply, storage, and transportation contracting.

- ***System Supply Requirement Review —*** PGW's supply portfolio is split into four distinct categories. First, the Company has entered into long-term gas deals which allows PGW to procure gas at least cost. Second, the Company enters into winter-only baseload supply contracts. Third, PGW's contracts with suppliers that allow for daily volumetric changes and are priced via the gas daily pricing index. Fourth, the company utilizes one unbundled pipeline storage service along with five bundled storages and our LNG facilities to cover winter demand over pipeline entitlements, as an additional source of supply to help keep costs low.

- ***Interstate Supply and Capacity Arrangements —*** Enbridge and Williams pipelines represent the only interstate pipeline facilities with physical connections to the PGW service territory. These supply contracts also recognize pipeline receipt and delivery rights. By sourcing supply in this manner, PGW not only ensures security of supply

from the pipelines but also can take advantage of varying basis differentiated pricing in the market.

- ***Utility and Contract Storage Inventory Delivery Plans*** **—** PGW utilizes bundled storage and LNG to meet operational requirements and to accomplish other cost saving initiatives.

- ***Emergency Curtailment Plans*** **—** PGW utilizes a three-phase Emergency Curtailment Plan: first Contractual Load Shedding, next Voluntary Usage Reductions, and last Mandatory Usage Reductions.

- ***Weather and Forecasting*** **—** PGW receives a 5-week forecast that is updated weekly and a 7-day forecast that is updated 3 times daily.

- ***Communications and Coordination with natural gas suppliers*** **—** For its third-party suppliers (Choice Program), PGW utilizes the Choice Electronic Bulletin Board ("EBB") to send message to its Choice suppliers in order to make sure they are aware of any anomalies which may affect their gas deliveries to the PGW City Gate. These could be weather related or pipeline related. To date, PGW has not had to interrupt its IT suppliers or FT suppliers.

5. Natural Gas Demand from Electric Generators

Following is PGW's response to the PUC question on Natural Gas Demand from Electric Generators.

Currently, within the Philadelphia Gas Works' service territory there is only one electric generation facility that generates electricity for sale that uses natural gas as its primary fuel source. This facility nominates purchases and transports gas to the city gate using its own contracts. PGW takes the gas at the city gate and transports this gas to the electric generation facility on PGW's gas distribution system. This customer's natural gas nominations and purchases are independent of the PGW contracts for natural gas

purchases for its other customers and will have no effect on PGW's fuel availability or PGW's ability to deliver gas to our firm customers even under design conditions. PGW is not aware of any future natural gas fired generation that would impact PGW's ability to serve its customers.