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May 27, 2010

Via Electronic Filing

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

**Re: Petition of Philadelphia Gas Works for Extension of Time
Docket No. P-2010-_____**

Dear Ms. Chiavetta:

Enclosed for filing please find the Petition of Philadelphia Gas Works for an Extension of Time, along with the electronic filing confirmation with regard to the above referenced matter.

Please call the undersigned if you have any questions or concerns regarding this filing.

Sincerely,

Edward G. Lanza
Counsel Philadelphia Gas Works

Enclosure

cc: Certificate of Service
Denise Adamucci, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Philadelphia Gas Works Universal Service
and Energy Conservation Plan 2011-2013

Docket No. P-2010-_____

**PETITION OF PHILADELPHIA GAS WORKS
FOR EXTENSION OF TIME**

Pursuant to Section 1.15 of the Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code § 1.15, Philadelphia Gas Works ("PGW"), hereby petitions for an extension of time to file its updated Universal Service and Energy Conservation Plan 2011-2013 with the Commission. In support thereof, PGW submits the following:

1. Pursuant to the Natural Gas Supply Customer Choice regulations, PGW is required to submit to the Commission for approval an updated Universal Service and Energy Conservation Plan ("Plan") every three years. 52 Pa. Code § 62.4. PGW's next proposed plan, for the period 2011-2013, is due to be filed on June 1, 2010.

2. On October 23, 2009, the Commission issued an Order at Docket No. M-00072021 approving a Settlement Agreement that permitted PGW to amend its 2008-2010 Universal Service Plan to comply with a directive from the Pennsylvania Department of Public Welfare ("DPW") concerning the application of Low Income Home Energy Assistance Program ("LIHEAP") Cash grants to the accounts of customers enrolled in PGW's Customer Assistance Program, the Customer Responsibility Program ("CRP").

3. Pursuant to the Settlement Agreement and the Commission's Order, PGW agreed to file a petition to propose any additional changes to its CRP which it believes are necessary.

This petition will address adjustments to CRP in light of the new DPW requirements regarding the application of LIHEAP Cash Grants.

4. PGW will file within the next seven (7) days, a petition proposing changes to CRP (“the CRP Petition”).

5. Any review of PGW’s overall Universal Service Plan would most efficiently and reasonably be conducted after the Commission rules on the changes proposed in the CRP Petition.

6. Accordingly, PGW respectfully requests that the PUC grant an extension of time in which to file its proposed 2011-2013 Universal Services Plan. Upon final Commission Order approving or rejecting any changes proposed in the CRP Petition, PGW proposes to submit its proposed Plan within 30 days of the entry of such final Order.

7. Further, pursuant to the Commission’s Policy Statement on Customer Assistance Programs (“CAP Policy Statement”), 52 Pa. Code § 69.265(10), PGW would be required to submit both a process evaluation, and an impact evaluation of its customer assistance program to the Commission.

8. Following the expansion or substantial revision of an existing customer assistance program, a one-time process evaluation completed by a third-party should be undertaken during the middle of the second year of the revised program. 52 Pa. Code § 69.265(10)(ii)(A). PGW submits that any such revision evaluation would be most reasonably performed after the changes to CRP, if any, have been fully implemented.

9. Accordingly, PGW respectfully requests that the Commission also extend the time for the filing of a CRP program revision process evaluation to December 1, 2012 – a date which is six (6) months prior to the filing of its Universal Service Plan due on June 1, 2013.

10. In addition, customer assistance program impacts must be evaluated by a third-party at no more than six-year intervals under 52 Pa. Code § 69.265(10)(ii)(B) and submitted to the Bureau of Consumer Services for review and approval. 52 Pa. Code § 69.265(10)(iii). PGW's next impact evaluation under Section 69.265(10)(ii)(B) is due no later than March 22, 2012.¹ PGW submits that such impact evaluation would most reasonably be performed after changes to CRP have been fully implemented and in conjunction with the program expansion evaluation.

11. Similarly, PGW is required to provide the Commission with an impact evaluation for its universal service and energy conservation programs under 52 Pa. Code § 62.6. CRP is a significant component of PGW's overall Universal Service and Energy Conservation Plan.

12. Based on the foregoing, PGW respectfully requests that the Commission extend the time for the filing of the CRP and universal service and energy conservation program impact evaluations to December 1, 2012.

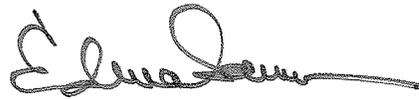
13. PGW has notified OTS, OCA and TURN about the filing of this Petition for Extension of Time, and the parties have not initially objected to the Company's filing of this Petition. However, such lack of objection to the filing of this Petition should not be viewed as any party granting consent to, or expressing any agreement with, any changes that PGW may propose to CRP or its Universal Service and Energy Conservation Plan.

¹ PGW records indicate that the last impact evaluation was filed on March 22, 2006.

WHEREFORE, for the reasons set forth above, Philadelphia Gas Works respectfully requests that the Commission grant this Petition and:

1. Extend the time for the filing of its Universal Service and Energy Conservation Plan 2011-2013 until 30 days after the entry of a final Commission order approving or rejecting changes to CRP.
2. Extend the time for the filing of its CRP process evaluation under 52 Pa. Code § 69.265(10)(ii)(A) to December 1, 2012.
3. Extend the time for the filing of its CRP and universal service and energy conservation program impact evaluations under 52 Pa. Code § 69.265(10)(ii)(B) and 52 Pa. Code § 62.6 to December 1, 2012.
4. Grant other such relief as is just, proper and in the public interest.

Respectfully submitted,



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Dated: May 27, 2010

VERIFICATION

I, Christine Coltro, Vice President of Customer Affairs for Philadelphia Gas Works ("PGW"), hereby state that the facts set forth in the attached Petition for Extension of Time are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter.

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 5/27/10


Cristina Coltro

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Petition for Extension of Time on the persons, listed below in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

VIA ELECTRONIC AND FIRST CLASS MAIL

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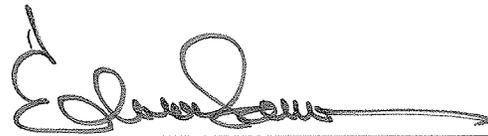
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Date: May 27, 2010