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July 7, 2010

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

VIA HAND DELIVERY

RE: Philadelphia Gas Works' Petition to Modify its Universal Services and Energy Conservation Plans With Respect to the Customer Responsibility Program; Docket No. P-2010-2178610

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") are the original and three (3) copies of the Petition to Intervene of the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG"), in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of this transmittal letter and Petition to Intervene, and kindly return it for our filing purposes.

Sincerely,

McNEES WALLACE & NURICK LLC

By

Carl J. Zwick

Counsel to the Philadelphia Industrial and Commercial
Gas Users Group

CJZ/sds

Enclosures

c: Chief Administrative Law Judge Veronica A. Smith (via Hand Delivery)
Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PHILADELPHIA GAS WORKS' PETITION :
TO MODIFY ITS UNIVERSAL SERVICES :
AND ENERGY CONSERVATION PLANS : DOCKET NO. P-2010-2178610
WITH RESPECT TO THE CUSTOMER :
RESPONSIBILITY PROGRAM :

**PETITION TO INTERVENE OF THE PHILADELPHIA INDUSTRIAL
AND COMMERCIAL GAS USERS GROUP**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to the provisions of 52 Pa. Code §§ 5.71-5.74, the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, PICGUG states as follows:

1. The Petitioner is the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG"). The composition of PICGUG is attached hereto as Appendix "A." PICGUG reserves the right to modify Appendix "A" throughout the course of this proceeding, as necessary.

2. The name and address of Petitioner's attorneys are:

Charis Mincavage (Pa. I.D. 82039)
Carl J. Zwick (Pa. I.D. 306554)
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3. On June 3, 2010, Philadelphia Gas Works ("PGW" or "Company") submitted to the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Petition to Modify its

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Universal Services and Energy Conservation Plans with Respect to the Customer Responsibility Program ("CRP"). Specifically, in the Petition, PGW requests that the Commission approve two modifications to the Company's CRP. First, PGW proposes to set the CRP support levels so that customers will realize the PUC-recommended targeted energy burdens after taking into account the effect of the Low Income Home Energy Assistance Program ("LIHEAP") cash grants, which are now applied to individual CRP recipients. Second, the Company requests to modify the CRP by adding a "conservation incentive" program element.

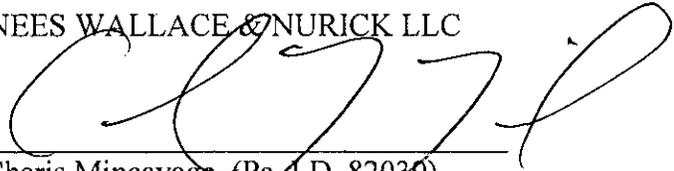
4. PICGUG is an ad hoc group of large volume natural gas customers receiving service from PGW under various rate schedules. PICGUG members use substantial volumes of natural gas in their businesses, and natural gas costs comprise a significant element of their respective costs of operation. PGW's Petition to modify its CRP, as well as the potential proposals that may be set forth by other active parties to the proceeding, may affect several of the Company's rate schedules, including schedules under which PICGUG members receive service. As a result, any PUC determination regarding PGW's Petition to modify its CRP may impact PICGUG member interests.

6. Therefore, consistent with 52 Pa. Code § 5.72(a), PICGUG has a significant interest in this proceeding that is not represented by any other party of record. See 52 Pa. Code § 5.72. Accordingly, the Commission should grant PICGUG intervenor status in this proceeding.

WHEREFORE, the Philadelphia Industrial and Commercial Gas Users Group respectfully requests that the Commission grant this Petition to Intervene and provide PICGUG with full party status.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

~~Charis Mincavage (Pa. I.D. 82039)~~

Carl J. Zwick (Pa. I.D. 306554)

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Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

Dated: July 7, 2010

APPENDIX "A"

PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP

Albert Einstein Healthcare Network, Inc.

Building Owners' and Managers'
Association of Philadelphia

Frankford Hospitals

Magee Rehabilitation Hospital

Philadelphia College of
Osteopathic Medicine

Thomas Jefferson University

Thomas Jefferson University Hospital

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST-CLASS MAIL

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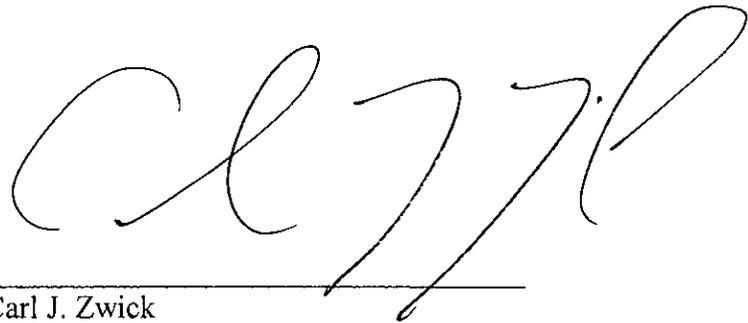
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Carl J. Zwick

Dated this 7th day of July, 2010, in Harrisburg, Pennsylvania.