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January 3, 2011

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

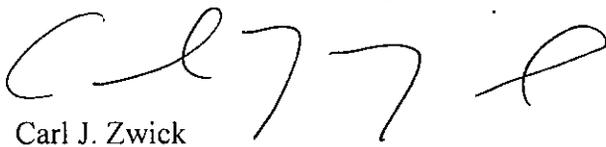
Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") are the original and three (3) copies of the Prehearing Conference Memorandum 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 an extra copy of this transmittal letter and Prehearing Conference Memorandum, and kindly return them for our filing purposes. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Carl J. Zwick

Counsel to the Philadelphia Industrial and Commercial Gas Users Group

CJZ/lmc
Enclosure

c: Administrative Law Judge Christopher Pell (via E-mail and First-Class Mail)
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	:	

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

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

The Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") hereby submits this Prehearing Conference Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

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 Universal Services and Energy Conservation Plans with Respect to the Customer Responsibility Program ("CRP"). On July 7, 2010, PICGUG filed a Petition to Intervene in this proceeding. A description of PICGUG is set forth in Paragraph 4 of PICGUG's Petition to Intervene. PICGUG's Petition to Intervene is pending and awaits disposition by Administrative Law Judge ("ALJ") Christopher P. Pell.

II. ANTICIPATED ISSUES AND SUB-ISSUES

Because any changes to the Company's CRP may affect several of the Company's rate schedules, including schedules under which PICGUG members receive service, PICGUG is concerned with all modifications to the CRP proposed in this proceeding. PICGUG anticipates pursuing these issues during this proceeding as necessary and reserves the right to raise further issues and to respond to all matters raised by other parties.

III. PROPOSED WITNESSES

PICGUG is in the process of evaluating whether it will sponsor testimony in this proceeding. In the event that PICGUG decides to sponsor testimony, it will immediately inform the parties and the ALJ of any intended witnesses and topics 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

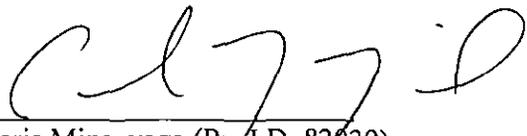
PICGUG will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any ALJ directives.

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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Counsel to the Philadelphia Industrial and Commercial Gas Users Group

Dated: January 3, 2011

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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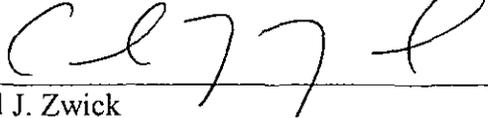
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Carl J. Zwick

Dated this 3rd day of January, 2011, in Harrisburg, Pennsylvania.