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February 24, 2011

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

VIA HAND DELIVERY

**RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works;
Docket No. R-2011-2224739**

Dear Secretary McNulty:

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 them for our filing purposes.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Charis Mincavage

Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

CM/leh
Enclosures

c: Chief Administrative Law Judge Charles E. Rainey, Jr. (via First-Class Mail)
Certificate of Service

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HARRISBURG, PA • LANCASTER, PA • STATE COLLEGE, PA • HAZLETON, PA • COLUMBUS, OH • WASHINGTON, DC

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PHILADELPHIA GAS WORKS

:
:
:
:
:
:

DOCKET NO. R-2011-2224739

**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. 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)
Patrick L. Gregory (VA Bar I.D. 72987)
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3. On January 31, 2011, Philadelphia Gas Works ("PGW" or "Company") submitted its Gas Cost Rate ("GCR") pre-filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") pursuant to Section 1307(f) of the Public Utility Code, 66 Pa.C.S. § 1307(f). Pursuant to this pre-filing, PGW is not proposing any rate structure or rate allocation changes at this time. PGW's supplemental filing is expected on or about March 1, 2011.

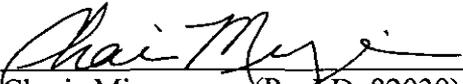
4. PICGUG is an ad hoc group of large volume natural gas customers receiving service from PGW under various rate schedules. PICGUG members use substantial volumes of natural gas in their businesses, and natural gas costs comprise a significant element of their respective costs of operation. PGW's GCR proposal 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 2011 GCR may impact PICGUG member interests.

5. 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)
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Patrick L. Gregory (VA Bar I.D. 72987)
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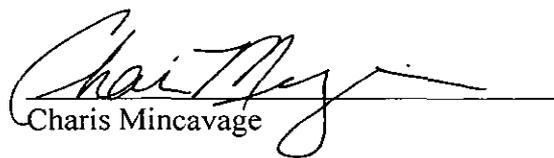
Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

Dated: February 24, 2011

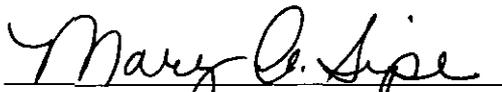
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :
: SS
COUNTY OF DAUPHIN :

Charis Mincavage, being duly sworn according to law, deposes and says that she is counsel to the Philadelphia Industrial and Commercial Gas Users Group, that in this capacity she is authorized to and does make this affidavit for them, and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of her knowledge, information and belief.


Charis Mincavage

SWORN TO and subscribed before
me this 24th day of February 2011


Notary Public

(SEAL)

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Mary A. Sipe, Notary Public
City of Harrisburg, Dauphin County
My Commission Expires March 19, 2013

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APPENDIX "A"

PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP

Building Owners' and Managers'
Association of Philadelphia

Philadelphia College of
Osteopathic Medicine

Thomas Jefferson University/
Jefferson Health System

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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).

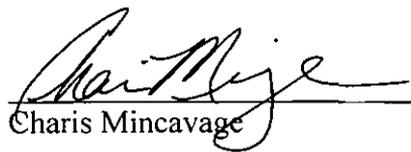
VIA E-MAIL AND FIRST-CLASS MAIL

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Charis Mincavage

Dated this 24th day of February, 2010, in Harrisburg, Pennsylvania.

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