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March 9, 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 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 Memorandum, and kindly return them for our filing purposes. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By   
Charis Mincavage

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

/Imc

Enclosures

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

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY :  
COMMISSION :

v. :

DOCKET NO. R-2011-2224739

PHILADELPHIA GAS WORKS :

**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 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). On February 28, 2011, PGW submitted its supplemental GCR filing. Pursuant to these filings, PGW is not proposing any rate structure or rate allocation changes at this time. On February 24, 2011, 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. SERVICE LIST ENTRY**

PICGUG respectfully requests that the following persons be added to both the official service list and the unofficial electronic distribution list:

Charis Mincavage, Esq.  
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### **III. 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.

### **IV. PROPOSED EVIDENCE AND WITNESSES**

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

### **V. ANTICIPATED ISSUES AND SUB-ISSUES**

Because PGW's 2011 GCR proposal may affect several of the Company's rate schedules, including schedules under which PICGUG members receive service, PICGUG is concerned with such proposal. PICGUG anticipates pursuing this issue during this proceeding as necessary and reserves the right to raise further issues and to respond to all matters raised by other parties.

**VI. 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: March 9, 2011

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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 9<sup>th</sup> day of March, 2011, in Harrisburg, Pennsylvania.

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