



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

**GREGORY J. STUNDER**  
**SENIOR ATTORNEY**  
**(215) 684-6878**  
**GREG.STUNDER@PGWORKS.COM**

March 9, 2011

**VIA EMAIL and OVERNIGHT MAIL**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
2<sup>nd</sup> Floor, 1 North  
400 North Street  
Harrisburg, PA 17120

**RECEIVED**

**MAR 09 2011**

**PA PUBLIC UTILITY COMMISSION**  
**SECRETARY'S BUREAU**

**RE: PaPUC v. Philadelphia Gas Works - Docket No. R-2011-2224739**

Dear Secretary Chiavetta,

On behalf of Philadelphia Gas Works, enclosed for filing is an original and three copies of its Prehearing Memorandum with regard to the above referenced matter. A copy has been served on the parties listed on the attached Certificate of Service.

Please contact me if you have any questions regarding this filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Gregory J. Stunder', is written over a printed name. The signature is fluid and cursive.

Gregory J. Stunder

Enclosure

cc: All Parties of Record  
Hon. Christopher Pell



2. Objections to interrogatories shall be communicated orally within three (3) days of service; unresolved objections shall be served to the ALJ in writing within five (5) days of service of the interrogatories.
3. Motions to dismiss objections and/or direct the answering of interrogatories shall be filed within three (3) business days of service of written objections.
4. Answers to motions to dismiss objections and/or direct the answering of interrogatories shall be filed within three (3) days of service of such motions and shall have attached a copy of the interrogatory or interrogatories and any responses.
5. Responses to requests for document production, entry for inspection, or other purposes must be served in-hand within ten (10) calendar days.
6. Requests for admission shall be deemed admitted unless answered within ten (10) days or objected to within five (5) days of service.
7. Answers to on-the-record data requests shall be served in-hand within seven (7) calendar days of the requests.

### **III. FACTUAL AND LEGAL ISSUES**

The following is a summary of the factual and legal issues that PGW anticipates will be raised in this case:

1. Whether PGW proposed 2011-12 projected natural gas expense and total applicable GCR Expense are just, reasonable and consistent with the least cost fuel procurement and other standards set forth in 66 Pa.C.S. §§ 1307(f), 1317 and 1318?
2. Whether PGW's claimed realized 2010-11 natural gas expense, GCR Expense and prior years' over/undercollection is just, reasonable and consistent with the least cost procurement and other standards set forth in 66 Pa. C.S. §§ 1307(f), 1317 and 1318?
3. Are the revisions to PGW's authorized Universal Service Charge (USC) designed to recover PGW's realized and projected costs and discounts associated with its CRP, CAP, Conservation Works Program (CWP), Enhanced Low Income Usage Reduction Program

(ELIRP) and Senior Citizen Discount (SCD) programs just, reasonable and in accordance with applicable PUC orders and the Public Utility Code?

4. Whether PGW's proposed Supplement No. 45 to PGW's Pa PUC Tariff No. 2 setting forth the revisions in rates required by the changes in the GCR, Restructuring, Efficiency Cost Recovery, OPEB and USC surcharges are just, reasonable and otherwise consistent with law?

5. Whether PGW's present natural gas supply plan, including a long-term pre-paid gas purchase contract, is in compliance with PUC requirements and 66 Pa. C. S. § 1317(d)?

#### **IV. SERVICE OF DOCUMENTS**

Service of documents in this matter should be on the following counsel of record:

Gregory J. Stunder, Esq.  
Senior Attorney  
Philadelphia Gas Works  
800 West Montgomery Ave.  
Philadelphia, PA 19122  
(215) 684-6878 (phone)  
(215) 684-6798 (fax)  
greg.stunder@pgworks.com

#### **V. SCHEDULE**

PGW has been communicating with the other parties in order to develop a proposed schedule for discovery, testimony, evidentiary hearings and submission of briefs and anticipates presenting a schedule during the pre-hearing conference.

**VI. WITNESSES**

PGW expects to submit the testimony of the following witnesses:

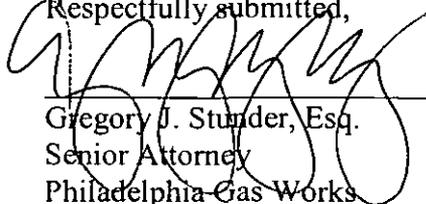
A. Douglas Moser (same business address as the undersigned). The issues Mr. Moser will address are outlined in the prepared direct testimony submitted on March 1, 2011.

B. Kenneth Dybalski (same business address as the undersigned). The issues Mr. Dybalski will address are outlined in the prepared direct testimony submitted on March 1, 2011.

PGW reserves its right to modify this witness list prior to the submission of testimony.

**VII. SETTLEMENT**

PGW is willing to discuss settlement of its claims and will be initiating such discussions as soon as the parties indicate they have had sufficient time to review PGW's direct case on the GCR.

Respectfully submitted,  
  
\_\_\_\_\_  
Gregory J. Stunder, Esq.  
Senior Attorney  
Philadelphia Gas Works  
800 West Montgomery Ave.  
Philadelphia, PA 19122  
(215) 684-6878

Dated: March 9, 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 §1.54 (relating to service by a participant).

**VIA EMAIL and FIRST CLASS MAIL**

Aron Beatty, Esq.  
Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place Bldg.  
555 Walnut Street  
Harrisburg, PA 17101-1921  
[abeatty@paoca.org](mailto:abeatty@paoca.org)

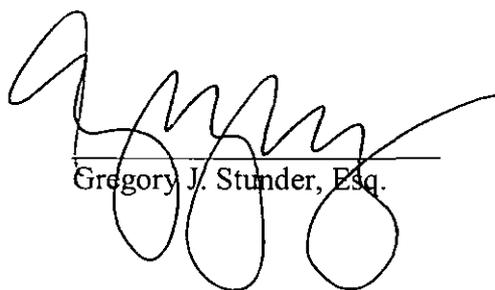
Charis Mincavage, Esq.  
McNEES, WALLACE, NURICK  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mwn.com](mailto:cmincavage@mwn.com)

Sharon Webb, Esq.  
Office of Small Business Advocate  
Commerce Building, Suite 1102  
300 North 2<sup>nd</sup> Street  
Harrisburg, PA 17101  
[swebb@state.pa.us](mailto:swebb@state.pa.us)

Richard LeLash  
Financial and Regulatory Consultant  
18 Seventy Acre Road  
Redding, CT 06896  
[lplash@snet.net](mailto:lplash@snet.net)

Adeolu Bakare, Esq.  
Office of Trial Staff  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120  
[abakare@state.pa.us](mailto:abakare@state.pa.us)

Robert Knecht  
Industrial Economics, Incorporated  
2067 Massachusetts Avenue  
Cambridge MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)

  
\_\_\_\_\_  
Gregory J. Stunder, Esq.

Date: March 9, 2011

**RECEIVED**

MAR 09 2011

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

# FedEx US Airbill

Express

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### 1 From This portion can be removed for Recipient's records.

Date 3-9-11 FedEx Tracking Number 872085688233

Sender's Name Gregory Stunder Esq. Phone \_\_\_\_\_

Company PHILADELPHIA GAS WORKS

Address 800 W MONTGOMERY AVE

Dept./Floor/Suite/Floor

City PHILADELPHIA State PA ZIP 19122-2898

### 2 Your Internal Billing Reference

### 3 To

Recipient's Name Rosemary Chiavetta Phone \_\_\_\_\_

Company PA PUC Commonwealth Keystone Bldg

Address 2nd Floor 1 North

Address 4100 North Street

City Harrisburg State PA ZIP 17120

HOLD Weekday  
FedEx location address  
REQUIRED. NOT available for  
FedEx First Overnight.

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REQUIRED. Available ONLY for  
FedEx Priority Overnight and  
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We cannot deliver to P.O. boxes or P.O. ZIP codes.

Use this line for the HOLD location address or for continuation of your shipping address.

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### 4a Express Package Service

\* To most locations.

Packages up to 150 lbs.

- FedEx Priority Overnight  
Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Standard Overnight  
Next business afternoon. Saturday Delivery NOT available.
- FedEx First Overnight  
Earliest next business morning delivery to select locations.\*
- FedEx 2Day  
Second business day. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Express Saver  
Next business afternoon. Saturday Delivery NOT available.

EXP SAVER

### 4b Express Freight Service

\*\* To most locations.

Packages over 150 lbs.

- FedEx 1Day Freight  
Next business day. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx 2Day Freight  
Second business day. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx 3Day Freight  
Third business day. Saturday Delivery NOT available.

### 5 Packaging

\* Declared value limit \$500.

- FedEx Envelope\*
- FedEx Pak\*  
Includes FedEx Small Pak and FedEx Large Pak
- FedEx Box
- FedEx Tube
- Other

### 6 Special Handling and Delivery Signature Options

- SATURDAY Delivery  
NOT available for FedEx Standard Overnight, FedEx Express Saver, or FedEx 3Day Freight.
- No Signature Required  
Package may be left without obtaining a signature for delivery.
- Direct Signature  
Someone at recipient's address may sign for delivery. Fee applies.
- Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies. For residential deliveries only. Fee applies.

#### Does this shipment contain dangerous goods?

- One box must be checked.
- No
  - Yes  
As per attached Shipper's Declaration.
  - Shipper's Declaration not required.
  - Dry Ice  
Dry Ice, 9 UN 1845 \_\_\_\_\_ x \_\_\_\_\_ kg
  - Cargo Aircraft Only
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

### 7 Payment Bill to:

- Sender  
Acct. No. in Section 1 will be billed.
  - Recipient
  - Third Party
  - Credit Card
  - Cash/Check
- Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.

Total Packages Total Weight \_\_\_\_\_ lbs. Credit Card Acct. \_\_\_\_\_

\*Our liability is limited to \$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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