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February 24, 2012

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-2012-2286447**

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 an extra copy of this transmittal letter and Petition, and kindly return it for our filing purposes. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Adeolu A. Bakare

Counsel to the Philadelphia Industrial and Commercial Gas Users Group

/lmc

Enclosures

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

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PHILADELPHIA GAS WORKS

:
:
:
:
:
:

DOCKET NO. R-2012-2286447

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

TO 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 names and address of Petitioner's attorneys are:

Charis Mincavage (Pa. I.D. 82039)
Adeolu A. Bakare (Pa. I.D. 208541)
McNEES WALLACE & NURICK LLC
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3. On January 31, 2012, 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, 2012.

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 2012 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 Pennsylvania Public Utility Commission grant this Petition to Intervene and provide PICGUG with full party status.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

Dated: February 24, 2012

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AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :
: SS
COUNTY OF DAUPHIN :

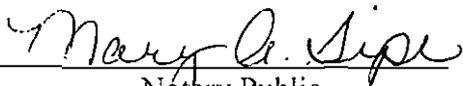
Adeolu A. Bakare, being duly sworn according to law, deposes and says that he is counsel to the Philadelphia Industrial and Commercial Gas Users Group, that in this capacity he is authorized to and does make this affidavit for them, and that the facts set forth in the foregoing Petition to Intervene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



Adeolu A. Bakare

SWORN TO and subscribed before
me this 24th day of February 2012

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Notary Public

(SEAL)

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

APPENDIX "A"

PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP

Aria Health

Building Owners' and Managers'
Association of Philadelphia

Einstein Healthcare Network

Magee Rehabilitation Hospital

Philadelphia College of
Osteopathic Medicine

Thomas Jefferson University/
Thomas Jefferson University Hospitals, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST-CLASS MAIL

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Adeolu A. Bakare

Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

Dated this 24th day of February, 2012, at Harrisburg, Pennsylvania

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