



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

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

January 2, 2013

VIA EMAIL and OVERNIGHT MAIL

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

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JAN - 2 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: PaPUC v. Philadelphia Gas Works - Docket No. R-2012-2333993

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, with a long horizontal stroke extending to the right.

Gregory J. Stunder

Enclosure

cc: All Parties of Record
Hon. Christopher Pell

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,

v.

Philadelphia Gas Works

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:
:
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Docket No. R-2012-2333993

**PHILADELPHIA GAS WORK'S
PREHEARING MEMORANDUM**

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I. INTRODUCTION

Philadelphia Gas Works ("PGW") submits this Prehearing Memorandum in anticipation of the Prehearing Conference scheduled before Administrative Law Judge Christopher Pell on January 4, 2013. This Prehearing Conference will address PGW's Supplement No. 55 to Gas Service Tariff Pa.P.U.C. No. 2 proposing to unbundle natural gas procurement costs and gas supply related uncollectible expense from distribution rates and recover these costs through a gas procurement charge and a merchant function charge that will be included in the price to compare.

II. DISCOVERY

The following rules are consistent with PGW's prior GCR proceedings and are acceptable to PGW:

1. Answers to written interrogatories shall be served in-hand within ten (10) calendar days of service of the interrogatories, except that service of interrogatories on a Friday shall be deemed service on the following Monday.
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

PGW's interpretation of the issues in this proceeding is set forth in the direct testimony and exhibits that each Company filed with their respective tariff supplements. The subject matters as discussed in and supported by the testimony and exhibits represent PGW's statement of the issues on this proceeding. Further definition of the issues will be developed by the parties during the course of this proceeding.

IV. SERVICE OF DOCUMENTS

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

Gregory J. Stunder, Esq.
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 communicated with the other parties in order to develop a proposed schedule for discovery, testimony, evidentiary hearings and submission of briefs and all parties have agreed to the following:

Non-company parties – direct testimony	Monday, February 11, 2013
All parties - rebuttal testimony	Friday, February 22, 2013
Surrebuttal	Wednesday, February 27, 2013
Oral rejoinder	Monday, March 4, 2013
Hearings	Monday, March 4, 2013
Close of record	Thursday, March 7, 2013
Main briefs	Monday, March 18, 2013
Reply briefs	Wednesday, March 27, 2013

VI. WITNESSES

PGW expects to submit the testimony of the following witnesses:

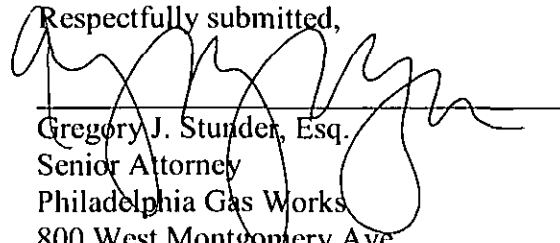
A. Howard S. Gorman (same business address as the undersigned). The issues Mr. Gorman will address are outlined in the prepared direct testimony submitted on November 13, 2012.

B. Kenneth Dybalski (same business address as the undersigned). The issues Mr. Dybalski will address are outlined in the prepared direct testimony submitted on November 13, 2012.

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.

Respectfully submitted,


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

Dated: January 2, 2013

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
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1921
abcatty@paoca.org

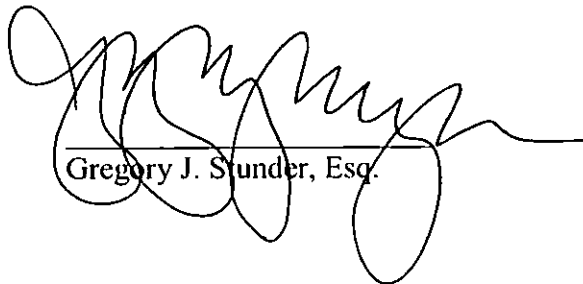
Adeolu Bakare, Esquire
McNEES, WALLACE, NURICK
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
abakare@mwn.com

Sharon Webb, Esq.
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North 2nd Street
Harrisburg, PA 17101
swebb@state.pa.us

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



Gregory J. Stunder, Esq.

Date: January 2, 2013

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3 To Recipient's Name

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Company PG&W

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