

Deanne M. O'Dell  
717.255.3744  
dodell@eckertseamans.com

May 28, 2014

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

Re: Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016  
Submitted in Compliance with 52 Pa. Code § 62.4 – Docket No. M-2013-2366301

---

Dear Secretary Chiavetta:

In the Reply Comments that were filed today in the above captioned docket by Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), CAUSE-PA states that “PGW’s USECP and Comments fail to address the needs of low-income households residing in multi-family buildings, which were highlighted by KEEA, PULP, NHT, and NRDC in a joint letter to the Secretary, constituting comments filed to this Docket.”<sup>1</sup> PGW was not served with a copy of the referenced letter/comments (which does not appear to have been served on any of the other parties in this matter, including the Office of Consumer Advocate, although Tenants Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia appears to be aware of the letter as they state that comments were submitted by “a group of four organizations”<sup>2</sup>) and did not become aware of the letter until reviewing the reply comments of CAUSE-PA.

Regarding the substance of the letter, the signatories request that PGW be “required to incorporate strategies to serve multifamily renters through the Enhanced Low Income Retrofit Program (ELIRP).” As explained in PGW’s Response, Comments and Reply Comments at this docket, the Commission approved PGW’s ELIRP pursuant to the Order entered July 29, 2010 at docket numbers R-2009-2139884 and P-2009-2097639 as part of PGW’s DSM plan – a proceeding in which neither CAUSE-PA nor any of the other signatories of the letter participated. As PGW’s ELIRP through August 31, 2015 has already been approved by the Commission based on a negotiated settlement with the parties in a different proceeding, PGW urges the Commission not to require PGW to implement changes to the existing plan as a part of

---

<sup>1</sup> Reply Comments of CAUSE-PA at 16.

<sup>2</sup> Reply Comments of TURN, et al. at 1

this proceeding. Requiring such changes now before the expiration of the DSM plan circumvents the review processes approved by the Commission in its July 29, 2010 Order as well as the overall, coordinated functioning of the DSM Plan.<sup>3</sup>

PGW is serving this letter on all stakeholders who have served comments in this proceeding including the Pennsylvania Utility Law Project (“PULP”), which represents CAUSE-PA and is a signatory on the letter.

Sincerely,



Deanne M. O'Dell

DMO/lww

cc: Cert. of Service  
Joseph Magee via email  
Louise Fink Smith via email  
Cyndi Page w/enc. via email

---

<sup>3</sup> PGW Reply Comments at 27.

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of PGW's Letter upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Email and/or First Class Mail**

Tanya J. McCloskey, Esq.  
Christy M. Appleby, Esq.  
Darryl Lawrence, Esq.  
Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place Bldg.  
555 Walnut Street  
Harrisburg, PA 17101-1921  
[tmccloskey@paoca.org](mailto:tmccloskey@paoca.org)  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)

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)

Phillip Bertocci, Esq.  
Thu B. Tran, Esquire  
Community Legal Services  
1424 Chestnut Street  
Philadelphia, PA 19102  
[pbertocci@clsphila.org](mailto:pbertocci@clsphila.org)  
[ttran@clsphila.org](mailto:ttran@clsphila.org)


Richard Kanaskie, Esq.  
Bureau of Investigation & Enforcement  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120  
[rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

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

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

Clean Air Council of Philadelphia  
135 South 19<sup>th</sup> St., Suite 300  
Philadelphia, PA 19103

Patrick M. Cicero, Esq.  
Harry S. Geller, Esq.  
Elizabeth R. Marx, Esq.  
The Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

  
Deanne M. O'Dell, Esq.

Date: May 28, 2014