

ORIGINAL

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July 12, 2004

VIA HAND DELIVERY

James McNulty, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg., 2nd  
Floor, 400 North Street P.O. Box 3265  
Harrisburg, PA 17105-3265

DOCUMENT  
FOLDER

RECEIVED  
2004 JUL 12 PM 3:57  
PA PUBLIC  
SECRETARY'S BUREAU

Re: Investigation into Financial and Collection Issues  
Regarding the Philadelphia Gas Works  
Docket Nos. P-00042090, R-00049157, M-00021612 &  
P-00032061

Dear Secretary McNulty:

Enclosed are the original and three copies of Philadelphia Gas Works' Motion for Waiver of Page Limit in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions, please contact me at your convenience.

Sincerely,  
*Daniel Clearfield*

Daniel Clearfield  
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

DC/jls  
Enclosures

cc: Hon. Charles E. Rainey, ALJ (w/enc)  
Certificate of Service (w/enc)

DSH:41784.1/PH1211-220875

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**ORIGINAL**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED  
2004 JUL 26 PM 3:58  
SECRETARY'S BUREAU  
PA PUC

Re: Petition of Philadelphia Gas Works for : Docket Nos. P-00042090  
Waiver of Public Utility Commission : R-00049157  
Customer Service Rules : M-00021612  
: P-00032061

**DOCKETED**  
JUL 26 2004

**PHILADELPHIA GAS WORKS' MOTION FOR WAIVER OF PAGE LIMIT**

Philadelphia Gas Works ("PGW") hereby submits this Motion for Waiver of Page Limit, in the above-captioned matter and states as follows:

1. In a Prehearing Order dated June 11, 2004, the Presiding Officer directed that briefs be limited to 60 pages.

2. Because of the scope of the consolidated proceeding, PGW's brief will have to discuss a number of issues, including: a) PGW's petition for Chapter 56 waiver; b) the PUC mandated investigation into PGW's collections practices; c) the PUC mandated investigation into its universal service programs; d) the reasonableness of PGW's Senior Citizen Discount program; and PGW Restructuring compliance filing issues.

3. PGW will not be able adequately or comprehensively to present its position on all of these issues in 60 pages and it is concerned that the restriction may make it more difficult for the presiding officer to prepare his recommended decision.

4. While PGW is not in a position presently to state the number of pages its will need to adequately brief all the issues, a modification of the main brief page limit to no more

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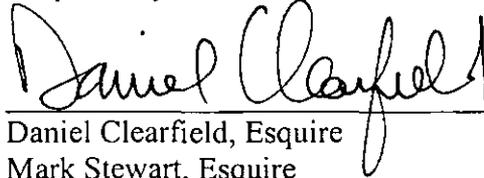
than 120 pages, and an expansion of the reply brief page limit to no more than 80 pages should permit a comprehensive presentation of the issues and discussion of the evidence.

5. Even with this page limit expansion, PGW shall continue to strive to make the briefs as concise as possible.

6. PGW has contacted the other parties in this matter and, at the time of this filing, PGW has heard from the following parties, none of whom oppose this request: Office of Trial Staff, Office of Consumer Advocate, PECO and PICGUG.

WHEREFORE, Philadelphia Gas Works respectfully requests that the Prehearing Order of June 11, 2004 be revised to authorize PGW to submit a main brief of up to 120 pages and a reply brief of no more than 80 pages.

Respectfully submitted,



---

Daniel Clearfield, Esquire  
Mark Stewart, Esquire  
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Of Counsel:  
Gregory Stunder, Esq.  
Philadelphia Gas Works  
800 West Montgomery Ave  
Philadelphia, PA 19122

Date: July 12, 2004

## CERTIFICATE OF SERVICE

I hereby certify that I have on this day, served a true copy of the foregoing document of Philadelphia Gas Works' upon the participants listed below in accordance with the requirements of § 1.54 (relating to service by a participant).

### VIA E-MAIL, FIRST CLASS MAIL & FACSIMILE

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### VIA E-MAIL & FIRST CLASS MAIL

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Dated: July 12, 2004

  
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Daniel Clearfield, Esq.