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February 17, 2015

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

**VIA ELECTRONIC FILING**

**RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works  
Docket No. R-2015-2465656**

Dear Secretary Chiavetta:

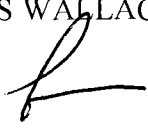
Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served.

Sincerely,

McNEES WALLACE & NURICK LLC

By

  
Elizabeth P. Trinkle

Counsel to the Philadelphia Industrial and Commercial Gas Users Group

Enclosure

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

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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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Elizabeth P. Trinkle

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

Dated this 17<sup>th</sup> day of February, 2015, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION	:	
	:	DOCKET NO. R-2015-2465656
v.	:	
	:	
PHILADELPHIA GAS WORKS	:	

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

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TO THE HONORABLE, 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 name and address of Petitioner's attorneys are:

Charis Mincavage (Pa. I.D. 82039)  
Adeolu A. Bakare (Pa. I.D. 208541)  
Elizabeth P. Trinkle (Pa. I.D. 313763)  
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3. On January 30, 2015, 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, 2015.


4. PICGUG is an ad hoc group of large volume natural gas customers receiving service from PGW under various rate schedules, including interruptible transportation, interruptible sales, and firm sales service. 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 2015 GCR may impact PICGUG members' 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 17, 2015



**APPENDIX A**

**PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

Aria Health

Building Owners and Managers Association

Einstein Healthcare Network

Magee Rehabilitation Hospital

Philadelphia College of  
Osteopathic Medicine

Thomas Jefferson University/  
Thomas Jefferson University Hospitals, Inc.