



PHILADELPHIA GAS WORKS

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March 20, 2015

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

RE: **PaPUC v. Philadelphia Gas Works - Docket No. R-2015-2465656**

Dear Secretary Chiavetta,

On behalf of Philadelphia Gas Works, enclosed for filing is an original 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 blue ink, appearing to read 'Gregory J. Stunder', is written over the typed name. The signature is stylized and cursive.

Gregory J. Stunder

Enclosure

cc: All Parties of Record
Hon. Christopher Pell
Hon. Marta Guhl

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

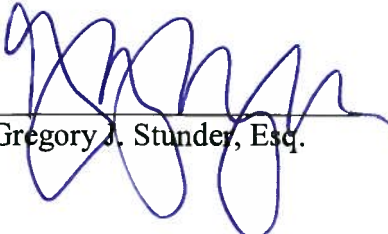
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Date: March 20, 2015



Gregory J. Stunder, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PHILADELPHIA GAS WORK'S
PREHEARING MEMORANDUM**

I. INTRODUCTION

Philadelphia Gas Works (“PGW”) submits this Prehearing Memorandum in anticipation of the Prehearing Conference scheduled before Administrative Law Judges Christopher P. Pell and Marta Guhl on March 24, 2015. This Prehearing Conference will address PGW’s 2015-16 Gas Cost Rate (“GCR”) proceeding, which includes the establishment of its 2015-16 proposed Universal Service Surcharge, for which PGW submitted its prefiling information on February 1, 2015 and its annual filing on March 1, 2015. Additionally, PGW submitted a Petition requesting waiver of certain Commission regulations pertaining to its supporting data and customer notice for the GCR.

II. DISCOVERY

The following rules are consistent with PGW’s prior GCR proceedings. Additionally, PGW has communicated with the other parties about the following discovery rules and all parties are in agreement with respect to the following:

1. Answers to written interrogatories will 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 business day;

2. Objections to interrogatories will be communicated orally within three (3) days of service; unresolved objections shall be served to the ALJs in writing within five (5) business days of service of the interrogatories;
3. Motions to dismiss objections and/or direct the answering of interrogatories will 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 will be filed within three (3) business days of service of such motions;
5. Responses to requests for document production, entry for inspection, or other purposes will be served in-hand within ten (10) calendar days;
6. Requests for admission will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) business days of service;
7. Answers to on-the-record data requests will be served in-hand within seven (7) calendar days of the request;
8. Rulings over motions shall be issued, if possible, within seven (7) calendar days of the filing of the motion;
9. Any discovery or discovery related pleadings such as objections, motions, answers to motions served on a Friday or on any business day preceding a state holiday shall be deemed to have been served on the following business day for purposes of tracking responsive due dates; and
10. That due dates be “in-hand” and that electronic or fax service on the due date will satisfy the “in-hand” requirement, where such service is immediately followed by a hard copy sent by first-class mail.

III. FACTUAL AND LEGAL ISSUES

The following is a summary of the factual and legal issues that PGW anticipates will be raised in this case:

1. Whether PGW proposed 2015-16 projected natural gas expense and total applicable GCR Expense are just, reasonable and consistent with the least cost fuel procurement and other standards set forth in 66 Pa.C.S. §§ 1307(f), 1317 and 1318?

2. Whether PGW's claimed realized 2014-15 natural gas expense, GCR Expense and prior years' over/undercollection is just, reasonable and consistent with the least cost procurement and other standards set forth in 66 Pa. C.S. §§ 1307(f), 1317 and 1318?

3. Are the revisions to PGW's authorized Universal Service Charge (USC) designed to recover PGW's realized and projected costs and discounts associated with its CRP, CAP, Enhanced Low Income Usage Reduction Program (ELIRP) and Senior Citizen Discount (SCD) programs just, reasonable and in accordance with applicable PUC orders and the Public Utility Code?

4. Whether PGW's proposed Supplement No. 79 to PGW's Pa PUC Tariff No. 2 setting forth the revisions in rates required by the changes in the GCR, OPEB and USC surcharges are just, reasonable and otherwise consistent with law?

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 (via email by 4:00 P.M. unless otherwise noted):

Non-Company Direct Testimony

Tuesday, April 14, 2015 (via email by noon)

All parties' Rebuttal Testimony	Monday, April 27, 2015
Surrebuttal Testimony	Tuesday, May 5, 2015
Oral Rejoinder	Friday, May 8, 2015 (at hearing)
Hearing	Friday, May 8, 2015
Close of Record	Friday, May 8, 2015
Main Briefs	Monday, May 18, 2015
Reply Briefs	Thursday, May 28, 2015

VI. WITNESSES

PGW expects to submit the testimony of the following witnesses:

- A. Raymond Snyder (same business address as the undersigned). The issues Mr. Snyder will address are outlined in the prepared direct testimony submitted on March 1, 2015.

- B. Kenneth Dybalski (same business address as the undersigned). The issues Mr. Dybalski will address are outlined in the prepared direct testimony submitted on March 1, 2015.

- C. William J. Patti (Brown & Brown of Pennsylvania, LP, The Curtis Center, Suite 805, 601 Walnut Street, Philadelphia, PA 19106). The issues Mr. Patti will address are outlined in the prepared direct testimony submitted on March 1, 2015.

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 on the GCR.

Respectfully submitted,



Gregory J. Stunder, Esq.
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800 West Montgomery Ave.
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Dated: March 20, 2015