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ORIGINAL

May 18, 2007

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
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P.O. Box 3265
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**DOCUMENT
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SECRETARY'S BUREAU

2007 MAY 18 PM 2:40

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Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works, Docket No. R-00061931

Dear Secretary McNulty:

On behalf of Philadelphia Gas Works, enclosed for filing please find an original and three copies of its Objection to the Archdiocese of Philadelphia Interrogatories, Set I with regard to the above referenced matter. A copy has been served in accordance with the attached Certificate of Service.

Very truly yours,



Daniel Clearfield

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

DC/lww
Enclosure

cc: Hon. Cynthia Fordham w/enc.
Hon. Angela Jones w/enc.
Cert of Service w/enc.

HAR:73274.1/PHI211-236005

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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).

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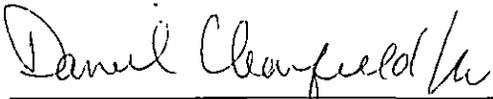
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Dated: May 18, 2007

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Daniel Clearfield, Esquire

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

Pennsylvania Public Utility Commission :

v. :

Docket No. R-00061931

Philadelphia Gas Works :

**PHILADELPHIA GAS WORKS' OBJECTION TO ARCHDIOCESE
OF PHILADELPHIA INTERROGATORIES, SET I**

Pursuant to 52 Pa. Code §§ 5.342 and 5.349, Philadelphia Gas Works ("PGW") hereby objects to the Interrogatories of the Archdiocese of Philadelphia ("Archdiocese"), Set I as follows:

1. On May 15, 2007, the Archdioceses served interrogatories on PGW.
2. Pursuant to the litigation schedule adopted on March 2, 2007, Evidentiary hearings in this matter are scheduled for May 21-25, 2007 and the record is set to close on May 25, 2007.
3. Responses to the interrogatories are due May 25, 2007, which is at the conclusion of the hearings and on the same day that the record closes.
4. Preparing responses to these discovery responses during the same time that the hearings are proceeding is unreasonably burdensome to PGW.
5. Even if PGW were to answer these interrogatories, they could not be used to develop the record in this matter due to the timing.

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6. PGW's initial filing was submitted on December 22, 2006, therefore, the Archdiocese has had ample time within which to conduct discovery in this matter.

Respectfully submitted,



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Deanne O'Dell, Esq.

Wolf, Block, Schorr and Solis-Cohen LLP

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Of Counsel:

Gregory Stunder, Esq.

Philadelphia Gas Works

800 West Montgomery Ave.

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Dated: May 18, 2007

Philadelphia Gas Works

Gregory J. Stunder
Senior Attorney



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May 18, 2007

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MAY 18 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00061963

R-00061931

Dear Secretary McNulty,

Please find enclosed the original and three (3) copies of Philadelphia Gas Works' ("PGW") Motion to Strike Portions of the Surrebuttal Testimony Presented by Judith L. Mondre on Behalf of the School District of Philadelphia.

Respectfully Submitted,

Gregory J. Stunder

DOCUMENT
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Enclosure

cc: Attached Certificate of Service w/enc.

Administrative Law Judge Cynthia Williams Fordham w/enc.

Administrative Law Judge Angela Jones

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION MAY 18 2007

Pennsylvania Public Utility Commission :
v. :
Philadelphia Gas Works :

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Docket No. R-00061931

DOCUMENT
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**MOTION TO STRIKE PORTIONS OF THE SURREBUTTAL
TESTIMONY PRESENTED BY JUDITH L. MONDRE ON BEHALF OF
THE SCHOOL DISTRICT OF PHILADELPHIA**

Philadelphia Gas Works ("PGW" or "Company"), pursuant to 58 Pa. Code § 5.103, respectfully submits this Motion to Strike Portions of the Surrebuttal Testimony Presented by Judith L. Mondre on Behalf of the School District of Philadelphia on May 15, 2007. The testimony presented at page 6, line 6 n. 1, and page 6, line 18 through page 10, line 12, addresses matters required to have been included in Ms. Mondre's direct testimony, is admittedly beyond Ms. Mondre's capacity to testify as an expert, and is riddled with hearsay. As such, the identified testimony should be stricken. In support of this Motion, PGW avers as follows:

1. In December 2006, PGW filed a petition to increase its base rates.
2. On or about April 9, 2007, Judith L. Mondre, on behalf of the School District of Philadelphia, served direct testimony addressing various issues related to the Company's rate proposal. As part of her testimony, Ms. Mondre criticized the health care benefits PGW provides to its retirees, either as part of its collective bargaining agreements or otherwise by contract. Mondre Direct at p. 9, ll. 6-11.
3. On May 4, 2007, PGW served rebuttal testimony by Craig E. White, Executive Vice President and Acting Chief Operating Officer of PGW, addressing, *inter alia*, Ms.

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MAY 22 2007

Mondre's health care benefits claims. Mr. White's testimony focused on the contractual nature of the health care benefit obligations about which Ms. Mondre complained. PGW St. 5R at p. 19.

4. On May 15, 2007, Ms. Mondre presented surrebuttal testimony. While Ms. Mondre initially provided a brief response to the contract-nature rebuttal of Mr. White, her surrebuttal testimony then careens off into a lengthy discussion about the "policies and practices of other government and private organizations with respect to retiree contributions and health benefits." Mondre Surrebuttal at p. 6., l. 18 – p. 10, l. 12. A true and correct copy of the objected to portion of testimony is attached hereto as Exhibit A. This testimony makes the exact same point Ms. Mondre attempted to make in her direct testimony, but in greater detail.

5. Section 5.243(e)(2) of the Commission's regulations declares that: "A party will not be permitted to introduce evidence during a rebuttal phase which: . . . (2) Should have been included in the party's case-in-chief." 58 Pa. Code § 5.243(e)(2). This prohibition applies squarely to the cited portions of Ms. Mondre's surrebuttal testimony, and as such it must be stricken.

6. Similarly, Ms. Mondre includes in her surrebuttal an inflammatory and brand new claim attacking the payment of performance-based bonuses to PGW's executives. Mondre Surrebuttal at p. 6, l. 6 n. 1. This allegation also should have and was required to have been made in the School District's direct testimony, and furthermore is well beyond the scope of Mr. White's rebuttal testimony. As such, footnote one to Ms. Mondre's surrebuttal testimony is also prohibited by 58 Pa. Code § 5.243(e) and must be stricken.

7. PGW further objects to and moves to strike Ms. Mondre's surrebuttal testimony about the health care benefit policies and practices of other governmental and private

organizations, as well as their relationship to PGW's policies and practices and her opinion as to the reasonableness of PGW's expenditures on the same, on the grounds that no foundation whatsoever exists to establish Ms. Mondre's expert status on such matters. Indeed, Ms. Mondre, herself, admits her lack of capacity to testify as an expert in this area: "Please note at the outset that I am not an employee compensation expert" Mondre Surrebuttal at p. 7, l. 1.

Accordingly, as Ms. Mondre has no basis to offer this expert testimony, her testimony should be stricken.

8. Finally, the Administrative Law Judge should strike the subject portions of Ms. Mondre's surrebuttal testimony as containing impermissible hearsay testimony. For example, Ms. Mondre qualifies part of her testimony about the practices of private employers in the Philadelphia region as follows: "I am also informed by various employee benefit and insurance professionals that" Mondre Surrebuttal at p. 10, ll. 1-2. Such hearsay testimony is not proper and should be stricken. *See Broughton v. Housing Authority of the City of Pittsburgh*, 755 A.2d 105, 107 (Pa. Cmwlth. 2000) ("[T]he Hearsay Rule is not a technical rule of evidence but a basic, vital and fundamental rule of law which ought to be followed by administrative agencies . . ."), *appeal denied* 641 A.2d 591 (Pa. 1994).

WHEREFORE, for all of the foregoing reasons, PGW requests that the Honorable Administrative Law Judge grant this Motion and strike the portion of Ms. Mondre's surrebuttal testimony identified above and in Exhibit A from the record.

Respectfully submitted

A handwritten signature in black ink, appearing to read 'Gregory J. Stunder', written over a horizontal line.

Gregory J. Stunder, Esq.
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(215) 684-6878

Dated: May 18, 2007

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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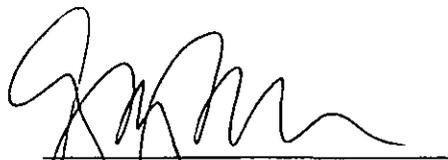
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Gregory J. Stunder, Esq.

EXHIBIT A

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

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Docket No. R-00061931

V.

PHILADELPHIA GAS WORKS

**SURREBUTTAL TESTIMONY OF JUDITH L. MONDRE ON BEHALF OF THE
SCHOOL DISTRICT OF PHILADELPHIA, INTERVENOR**

The School District of Philadelphia, Intervenor (the "School District") submits the following surrebuttal testimony of Judith L. Mondre, President of Mondre Energy, Inc., pursuant to 52 Pa.Code §5.412.

1 matter of common knowledge that organizations can, and do, change
2 benefit plans and require health care contributions after employees have
3 retired. These issues also are part of collective bargaining negotiations as
4 contracts come up for renewal. "My hands are tied" is not a valid
5 explanation for the continuation of this practice, just as it would not be to
6 the shareholders if PGW were a for-profit corporation.¹

7 There appears to be no regulatory requirement that PGW continue
8 to pay its retiree health benefits. The City Ordinance governing PGW's
9 retirement plans imposes no requirement that benefits be fully funded by
10 PGW; in fact, it requires PGW to provide sufficient funding for "current
11 benefit obligations" under the retirement schedules for retirees, and
12 "future benefit obligations" with respect to active employees and deferred
13 vested employees. See Philadelphia City Council Bill No. 020348, May
14 16, 2002, updating previous pension plans from PGW, annexed as Exhibit
15 AD-3 to the Rebuttal Testimony of Albert L. D'Attilio on behalf of PGW,
16 at Page 27. City Council also authorized PGW to amend the retirement
17 plans. *Id.* at 39.

18 **Q. WHAT IS YOUR UNDERSTANDING OF THE POLICIES AND**
19 **PRACTICES OF OTHER GOVERNMENT AND PRIVATE**
20 **ORGANIZATIONS WITH RESPECT TO RETIREE**
21 **CONTRIBUTIONS TO HEALTH BENEFITS?**

¹ Likewise, the payment of performance-based bonuses to PGW's executives in view of the current condition of the company would likely cause a shareholder revolt in private enterprise, and undoubtedly creates considerable resentment from the public in this case.

1 A. Please note at the outset that I am not an employee compensation expert,
2 and that the information included in the following responses was equally
3 available to PGW. That being said, I am informed that fewer and
4 fewer public and private employers are offering retiree health coverage at
5 all, and nearly all employers either already require retirees to contribute to
6 the cost or are planning to increase their retirees' contributions in the next
7 few years.

8 **Q. DOES THE COMMONWEALTH OF PENNSYLVANIA PAY**
9 **HEALTH CARE COSTS FOR ALL RETIERS WITHOUT**
10 **REQUIRING THEM TO CONTRIBUTE TO THE PREMIUM**
11 **COST?**

12 A. No, it does not. There are three categories in the Pennsylvania State
13 Employees Retirement System for retiree health care benefits: Most
14 employees retiring on or after July 1, 2005 must contribute an amount
15 equal to one percent (1%) of their final year's salary to their premiums.
16 Some retirees' health care costs are fully paid. Still others receive only \$5
17 per month from the Commonwealth towards their premiums. As is the
18 case with most retirement plans, the benefits available and their cost
19 depend upon when the employee retired and how long s/he served. It is
20 also important to note that the Commonwealth, like other employers, can
21 change benefits at any time.

22 I am informed that the Public Utility Commission's employees
23 are covered by PSERS. Parenthetically, the School District of Philadelphia

1 does not offer health benefits to non-represented employees, and
2 *unionized retiree coverage is dependent upon individual unions' health*
3 *and welfare fund practices.*

4 **Q. DOES THE FEDERAL GOVERNMENT PROVIDE HEALTH**
5 **INSURANCE TO ALL ITS RETIREES WITHOUT REQUIRING A**
6 **CONTRIBUTION FROM THE RETIREE?**

7 A. No, it does not. Federal employees' retirement health benefits are
8 administered either through the Federal Employees Health Benefits
9 System ("FEHB") or the Civil Service Retirement System ("CSRS").
10 Retirees purchasing health insurance under either system pay the same
11 premiums they did while on the job.

12 **Q. DO OTHER REGULATED UTILITIES IN PENNSYLVANIA**
13 **REQUIRE RETIREES TO CONTRIBUTE TO THEIR HEALTH**
14 **CARE COSTS?**

15 A. Yes, they do. Duquesne Power and Pennsylvania Power and Light, who
16 rank among the Commonwealth's largest utility companies, both require
17 retiree contribution. SEC filings for both companies also state their
18 respective intentions to lower or eliminate company contributions to
19 retiree health care in the relatively near future.

20 **Q. WHAT IS YOUR UNDERSTANDING OF THE PRACTICES OF**
21 **OTHER EDUCATIONAL INSTITUTIONS AND NON-PROFIT**
22 **ORGANIZATIONS WITH REGARD TO RETIREE HEALTH**
23 **CARE CONTRIBUTIONS?**

1 A. My general understanding is that educational and non-profit organizations
2 are requiring greater retiree contributions than they already charge. A
3 November 2006 report from TIAA-CREF Institute, an organization
4 providing retirement benefits to employees in higher education and other
5 non-profit services, stated that even more colleges and universities,
6 traditionally regarded as "paternalistic" and generous with regard to
7 retirement benefits, are turning to increased retiree contributions or
8 eliminating health care benefits for future (and occasionally current)
9 retirees in order to control their costs. This is, in part, because retiree
10 health care costs grew at a faster rate than those for active workers.²

11 **Q. WHAT IS YOUR UNDERSTANDING OF THE PRACTICES AND**
12 **POLICIES OF PRIVATE EMPLOYERS WITH REGARD TO**
13 **REQUIRING THEIR RETIREES TO CONTRIBUTE TO THEIR**
14 **HEALTH CARE COSTS?**

15 A. According to the Employee Benefit Research Institute ("EBRI"), the
16 percentage of employers offering health care benefits to either
17 Medicare- or non-Medicare-eligible retirees at any cost
18 declined from 20 percent in 1997 to 13% in 2002.³ At the same time
19 private sector employers are reducing the scope of the coverages they do
20 offer, some 56% of large private sector employers are "very likely" to
21 increase retiree contributions and require higher coinsurance and
22 copayments from employees by the end of the decade. EBRI at 11.

² TIAA-CREF Institute, "The Retiree Health Care Challenge," November 2006 at ii, 2, 7.

³ Employee Benefit Research Institute Issue Brief No. 279, March 2005.

1 I am also informed by various employee benefit and insurance
2 professionals that private employers in the Philadelphia region are
3 attempting to control their health care costs by raising retiree health care
4 contributions, requiring retirees to bear the entire cost of their health
5 insurance, or eliminating such coverage altogether.

6 **Q. BASED ON THE FOREGOING, HAVE YOU FORMED AN**
7 **OPINION REGARDING THE REASONABLENESS OF PGW'S**
8 **EXPENDITURES OF APPROXIMATELY \$11,609,657.00 ON**
9 **RETIREE HEALTH BENEFITS?**

10 A, Yes, I have, and I continue to believe these expenditures are not
11 reasonable, given that the cost of such benefits is being borne by people
12 who do not enjoy the same privileges.

13 **III. PGW'S REAL ESTATE PURCHASES AND DEVELOPMENT PLANS**

14
15 **Q. IN YOUR DIRECT TESTIMONY, YOU CRITICIZED PGW'S**
16 **PROPOSED \$900,000 EXPENDITURE TO ACQUIRE LAND AND**
17 **UPGRADE SECURITY AT ITS PASSYUNK PLANT. ON WHAT**
18 **INFORMATION DID YOU RELY IN CONCLUDING THAT THE**
19 **TRACT WAS AT THE PASSYUNK PLANT?**

20 A. PGW later identified this purchase as occurring at its Passyunk plant. OTS
21 RE- xxx.

22 **Q. DID YOU REVIEW MR. WHITE'S REBUTTAL TESTIOMNY**
23 **REGARDING THE PURCHASE PRICE OF THE A TRACT OF**

OALJ Hearing Report

Please check Those Blocks Which Apply

Docket No.:	R-00061931, R-00061931C0001-C0067	YES	NO
Case Name:	Pennsylvania Public Utility Commission v. Philadelphia Gas Works	Prehearing Held:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Location:	Philadelphia, PA	Hearing Held:	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Date:	May 21, 2007	Testimony Taken:	<input checked="" type="checkbox"/> YES <input checked="" type="checkbox"/> NO
ALJ:	Cynthia W. Fordham & ANGELA JONES	Transcript Due:	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Reporting Firm:	Commonwealth Reporting	Hearing Concluded:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
		Further Hearing Needed:	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
		Estimated Add'l Days:	scheduled for 5/22, 5/23 + 5/24
		RECORD CLOSED:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
		Briefs to be Filed:	DATE: 5/25/07 <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
		Bench Decision:	DATE: Main 6/12; Reply 6/21 <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
		REMARKS:	1st day of rate case

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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Robert J. Stewart

Reporter's Signature

Note: Completion of this form does not constitute an entry of appearance, see 52 Pa. Code §§1.24 and 1.25.

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Miles H. Shore	440 N. Broad St City: Phila State: PA Zip: 19130	School District of Phila
Telephone:	E-mail Address: mhshore@philaschools.org	Fax Number: 215-400-4121
Sheron Webb Loren Lepiluski	300 N. Second St City: Harrisburg State: PA Zip: 17101	OSBA
Telephone: 717-783-2585	E-mail Address: lepiluski@osba.org	Fax Number: 717-783-2831
Philip Hinceman Jill Galdin 215 299 2000	Fox Kroll, LLP 2000 Market St. City: Philadelphia State: PA Zip: 19103	PLFA 215 299 2150
Telephone:	E-mail Address:	Fax Number:

OALJ Hearing Report

Please check Those Blocks Which Apply

Docket No.:	R-00061931, R-00061931C0001-C0067		YES	NO
		Prehearing Held:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Case Name:	Pennsylvania Public Utility Commission v.	Hearing Held:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Philadelphia Gas Works	Testimony Taken:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Transcript Due:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Hearing Concluded:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Location:	Philadelphia, PA	Further Hearing Needed:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Date:	May 22, 2007	Estimated Add'l Days:	scheduled for 5/23 + 5/24	
		RECORD CLOSED:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ALJ:	Cynthia W. Fordham and Angela Jones	DATE:	5/25/07	
		Briefs to be Filed:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reporting Firm:	Commonwealth Reporting	DATE:	main 6/12, reply 6/21	
		Bench Decision:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		REMARKS:	2d day of rate case	

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JUN - 5 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PLEASE PRINT CLEARLY - Incomplete Information may result in delay of processing.

Name and Telephone Number	Address	Who are you representing?
Dan Clearfield Deanne O'Dell Wolf Block	213 Market St. 9th Fl City: <u>Harrisburg</u> State: <u>PA</u> Zip: <u>17101</u>	PGW
Christy Appleby Darryl Lawrence Tanya McCleskey	5th Floor, Forum Place 555 Walnut St. City: <u>Harrisburg</u> State: <u>PA</u> Zip: <u>17101-1923</u>	Office of Consumer Advocate
Todd S. Stewart Hawke McKeon & Siskak LLP	90 Box 1778 100 N 10th St. City: <u>Harrisburg</u> State: <u>PA</u> Zip: <u>17101</u>	IGS

Check this box if additional parties or attendees appear on back of form.

William P. Horst
Reporter's Signature

Note: Completion of this form does not constitute an entry of appearance, see 52 Pa. Code §§1.24 and 1.25.

Name and Telephone Number	Address	Who are you representing?
Charis Minicavage	100 Pine St. City: Nbg State: PA Zip: 17108	PICGUT
Telephone: 717-232-8000	E-mail Address: cminicavage@mun.com	Fax Number: 717-237-5300
Ronald A. Karaskie Allison C. Kaster	P.O. Box 3265 City: Harrisburg State: PA Zip: 17105	Office of Trial Staff
Telephone: (717) 783-7998	E-mail Address: akaster@stat.pa.us	Fax Number: (717) 772-2677
Lauren Lepkoski Sharon Webb 717 783 2525	300 N Second St City: Harrisburg State: PA Zip: 17105	OSBA
Telephone:	E-mail Address: lllepkoski@skr.pa.us shwebb@stat.pa.us	Fax Number: 717 783-2831
Miles H. Shore	440 N. Broad St. City: Phila State: PA Zip: 19130	School District of Philadelphia Intervenor
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Philip A. Bertocci Thu B. Tran	Community Legal Services, Inc. 1424 Chestnut St City: Philadelphia State: PA Zip: 19102	Action Alliance of Senior Citizens Tenant Union Representative Network
Telephone: 215-981-3702	E-mail Address: pbertocci@clsphila.org	Fax Number: 215-981-0435
Gregory Stunder	PGW 800 W. Montgomery Ave. City: Phila State: PA Zip: 19122	PGW
Telephone: 215-684-6878	E-mail Address: greg.stunder@pgworks.com	Fax Number: 215-684-6790
Philip Hineman	100 2000 Market St P City: Phila State: PA Zip: 19103	PHA
Telephone:	E-mail Address:	Fax Number:
	City State Zip	
Telephone:	E-mail Address:	Fax Number:

OALJ Hearing Report

Please Check Those Blocks Which Apply

Docket No.:	R-00061931, R-00061931C0001-C0067	Prehearing Held:	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Case Name:	Pennsylvania Public Utility Commission v. Philadelphia Gas Works	Hearing Held:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Location:	Philadelphia, PA	Testimony Taken:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Date:	May 23, 2007	Transcript Due:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ALJ:	Cynthia W. Fordham and Angela Jones	Hearing Concluded:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reporting Firm:	Commonwealth Reporting	Further Hearing Needed:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Estimated Add'l Days:	5/24 - last day of 4 day rate case	
		RECORD CLOSED:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Briefs to be Filed:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Bench Decision:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		DATE:	5/25/07	
		DATE:	main 6/12 - reply 6/18	
		REMARKS:		

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PA PUBLIC UTILITY COMMISSION
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PLEASE PRINT CLEARLY - Incomplete Information may result in delay of processing.

Name and Telephone Number	Address	Who are you representing?
Richard A. Kanaskie Alison C. Kaster Telephone: (717) 783-7998	P.O. Box 32065 Harrisburg PA 17105 E-mail Address: akaster@statepa.us	Office of Trial Staff
Christy Appleby Darryl Lawrence Tanya McCaskey Telephone: 717-783-5048	5th Floor, Forum Place 555 Walnut St. Harrisburg PA 17101 E-mail Address: Cappleby@pocca.org	OCA
Daniel Clearfield Deanne O'Dell Telephone:	213 Market 9th Fl Harrisburg PA 17101 E-mail Address:	PGW
		Fax Number:

Check this box if additional parties or attendees appear on back of form.

Tanya Conroy

Reporter's Signature

Note: Completion of this form does not constitute an entry of appearance, see 52 Pa. Code §§1.24 and 1.25.

Name and Telephone Number	Address	Who are you representing?
Miles H. Shore	440 N. Broad St City: Phila State: PA Zip: 19130	School District of Philadelphia
Telephone: 215-400-5162	E-mail Address: mhshore@phila.k12.pa.us	Fax Number: 215-400-4121
Sharon Webb Lauren Lepkacki	300 N. 2nd St Ste 1107 Commerce Bldg City: Harrisburg State: PA Zip: 17101	OSBA
Telephone: 717 783-2525	E-mail Address: sweabro@state.pa.us	Fax Number: (717) 783 2831
Thu B. Tran / PO	1424 Chestnut St. City: Phila State: PA Zip: 19102	Action Alliance of Senior Citizens of Greater Phila + Tenant Union Representative Network
Telephone: 215-981-3777	E-mail Address: htran@clsphila.org	Fax Number: 215-981-0435
Philip Hinceman	2000 Market St City: Philadelphia State: PA Zip: 19105	P4A
Telephone:	E-mail Address:	Fax Number:
Gregory Stunder	PLGW 800 W. Montgomery Ave City: Phila State: PA Zip: 19122	PLGW
Telephone: 215-684-6878	E-mail Address: greg.stunder@pscombs.com	Fax Number: 215-684-6798
TODD S. STEWART Hankie Wicken & Smiscal LLP	PO box 1778 100 N 10th St. City: Harrisburg State: PA Zip: 17101	IGS
Telephone: 717 236 1300	E-mail Address: tssstewart@hwslycal.com	Fax Number: 717 236 4841
	City: State: Zip:	
Telephone:	E-mail Address:	Fax Number:
	City: State: Zip:	
Telephone:	E-mail Address:	Fax Number:

OALJ Hearing Report

Please check Those Blocks Which Apply

Docket No.:	R-00061931, R-00061931C0001-C0067	Prehearing Held:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Case Name:	Pennsylvania Public Utility Commission v. Philadelphia Gas Works	Hearing Held:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Location:	Philadelphia, PA	Testimony Taken:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Date:	May 24, 2007	Transcript Due:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ALJ:	Cynthia W. Fordham and Angela Jones	Hearing Concluded:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reporting Firm:	Commonwealth Reporting	Further Hearing Needed:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Estimated Add'l Days:		
		RECORD CLOSED:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		DATE:	5/25/07	
		Briefs to be Filed:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		DATE:	main 6/12 reply 6/18	
		Bench Decision:	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PLEASE PRINT CLEARLY - Incomplete information may result in delay of processing.

REMARKS: one on the record request and one stipulation to be submitted by 6/11; all other information & testimony admitted

Name and Telephone Number	Address	Who are you representing?
Christy Applesby Danyl Lawrence Tanya McCloskey	5th Floor, Forum Place 555 W Walnut St. City: Harrisburg State: PA Zip: 17101	OCA
Telephone: 717-783-5048	E-mail Address: capplesby@paooca.org	Fax Number: 717-783-7152
Sharon F. Webb Lauren M. Lepkoski	300 N. 2nd St, Suite 1102 Commerce Bldg. City: Harrisburg State: PA Zip: 17101	OSBA
Telephone: (717) 783 2525	E-mail Address: swebb@state.pa.us	Fax Number: (717) 783-2831
Richard A. Kaskul Allison C. Kaster	P.O. Box 3265 City: Harrisburg State: PA Zip: 17105	Office of Trial Staff
Telephone: (717) 783-7998	E-mail Address: r.kaskul@state.pa.us	Fax Number: (717) 772-2677

Check this box if additional parties or attendees appear on back of form.

Jan Camp
Reporter's Signature

Note: Completion of this form does not constitute an entry of appearance, see 52 Pa. Code §§1.24 and 1.25.

Name and Telephone Number	Address			Who are you representing?
Philip A Bertocci Thue B. Tran	1424 Chestnut St Community Legal Services Philadelphia PA 19102			Action Alliance of Senior Citizens Tenant Union Representative Network
Telephone: 215-981-3702	E-mail Address: pbartocci@clsphila.org ttran@clsphila.org			Fax Number: 215-981-0435
Jill A GULDIN	2000 Market St. 10th Flr. Phila PA 19103			Philadelphia Housing Authority
Telephone: 215-299-2000	E-mail Address: jguldin@foxrothschild.com			Fax Number: 215-299-2150
Gregory Stunder	PGW 800 W. Montgomery Ave Phila PA 19122			PGW
Telephone: 215-684-6878	E-mail Address: greg.stunder@pgworks.com			Fax Number: 215-684-6798
Dan Clearfield Deanne O'Dell	213 Market St, 9th Floor Harrisburg PA 17018			PGW
Telephone: 717-237-7173	E-mail Address: dclearfield@workblock.com			Fax Number:
	City State Zip			
Telephone:	E-mail Address:			Fax Number:
	City State Zip			
Telephone:	E-mail Address:			Fax Number:
	City State Zip			
Telephone:	E-mail Address:			Fax Number:
	City State Zip			
Telephone:	E-mail Address:			Fax Number:



Fox Rothschild LLP
ATTORNEYS AT LAW

2000 Market Street, Tenth Floor
Philadelphia, PA 19103-3291
Tel 215.299.2000 Fax 215.299.2150
www.foxrothschild.com

Jill A. Guldin
Direct Dial: (215) 299-2878
Internet Address: jguldin@foxrothschild.com

ORIGINAL

May 25, 2007

VIA FEDERAL EXPRESS

Pennsylvania Public Utility Commission
Secretary's Bureau
Commonwealth Keystone Building
2nd Floor, Room N-201
400 North Street
Harrisburg, PA 171020-3265

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MAY 25 2007

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

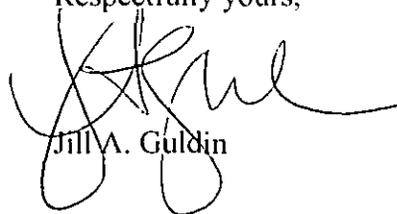
**Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00061931**

Dear Secretary:

Enclosed for filing is an original and three (3) copies of the Motion Of Philadelphia Housing Authority to Supplement Record in the above-captioned proceeding,

Copies are being served on all active parties of record.

Respectfully yours,



Jill A. Guldin

**DOCUMENT
FOLDER**

JAG/mn

Enclosures

cc: The Honorable Cynthia W. Fordham (w/encl.)
The Honorable Angela T. Jones (w/encl.)
Parties of Record (w/encl.)

A Pennsylvania Limited Liability Partnership

California Delaware Florida Nevada New Jersey New York Pennsylvania

one

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PHILADELPHIA GAS WORKS

:
:
:
:
:

Docket No. R-00061931 MAY 25 2007

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

MOTION OF PHILADELPHIA HOUSING AUTHORITY TO SUPPLEMENT RECORD

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES CYNTHIA WILLIAMS
FORDHAM AND ANGELA T. JONES:

The Philadelphia Housing Authority ("PHA"), through its undersigned counsel, hereby moves, pursuant to 52 Pa.Code §§ 5.103(a) and (b), to supplement the record developed by PHA to date in the above-captioned matter, and in support thereof states as follows:

1. PHA pre-filed written Direct, Supplemental and Surrebuttal testimony of Judith L. Mondre, President of Mondre Energy, Inc.
2. Ms. Mondre's testimony was subsequently entered into evidence as PHA Statements 2, 2S and 2SUR, respectively.
2. On May 22, 2007, Craig White of Philadelphia Gas Works ("PGW") testified on cross-examination regarding historical gas rate data for the GS-Residential ("GS-R"), GS-Commercial ("GS-C"), GS-Industrial ("GS-I"), Municipal Service ("MS") and PHA rate classes.
3. Part of Mr. White's cross-examination related to an exhibit in his rebuttal testimony, CW-10, a copy of which is attached hereto as Exhibit A.
4. Exhibit CW-10 is a summary of historical rates for the above rate classes from September 1, 1993 to the present.

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SEP 22 2007

5. Mr. White testified that he could provide no information regarding the PHA rate prior to 1993.

6. In response to Mr. White's cross-examination, and in order to assist the Commission, Ms. Mondre prepared a chart (the "MEI Chart"), annexed as Appendix 1 to her Affidavit, which is attached hereto as Exhibit B.

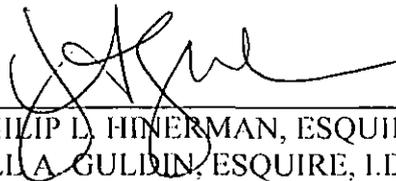
7. The MEI Chart consists of monthly rate data for the GS-R, GS-C, GS-I, MS and PHA rate from January 1990 to May 2007. This data was provided by PGW and is a matter of public record.

8. The MEI Chart is admissible into evidence insofar as it was prepared from rate information provided by PGW and filed as a matter of public record, and is further authenticated by means of Ms. Mondre's Affidavit.

9. The record has not yet closed in this proceeding.

WHEREFORE, PHA respectfully requests the entry of an order granting its motion, and receiving into evidence PHA Exhibit 5, consisting of the Affidavit of Judith L. Mondre and accompanying Appendix 1.

Respectfully Submitted,



PHILIP L. HINERMAN, ESQUIRE, I.D. #55496
JILL A. GULVIN, ESQUIRE, I.D. #93657
FOX ROTHSCHILD LLP
2000 Market Street, 10th Floor
Philadelphia, PA 19103-3291
(215) 299-2000

Attorneys for Petitioner,
PHILADELPHIA HOUSING AUTHORITY

Dated: May 25, 2007

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

EXHIBIT A

Philadelphia Gas Works
Base Rate History
09/01/1993 to present

	<u>Residential</u>	<u>Commercial</u>	<u>Industrial</u>	<u>PHA</u>	<u>MS</u>
9/1/2003 to present	\$4.2124	\$4.3056	\$4.3029	\$4.2952	\$3.1470
8/1/2003	4.2984	4.3916	4.3889	4.3812	3.2330
4/11/2003	4.2984	4.3916	4.3889	4.3812	3.2330
3/1/2003	4.2984	4.3916	4.3889	4.3812	3.2330
12/1/2002	4.2984	4.3916	4.3889	4.3812	3.2330
9/1/2002	4.2984	4.3916	4.3889	4.3812	3.2330
6/1/2002	4.2984	4.3916	4.3889	4.3812	3.2330
6/1/2002	4.1134	3.9400	3.9400	3.9460	3.2330
4/16/2002	4.2984	4.3916	4.3889	4.3812	3.2330
4/16/2002	4.1134	3.9400	3.9400	3.9460	3.2330
3/1/2002	3.5970	3.9400	3.9400	3.9460	3.2330
3/1/2002	3.4120	3.9400	3.9400	3.9460	3.2330
12/1/2001	3.7319	3.9400	3.9400	3.9460	3.2330
10/13/2001	3.7319	3.9400	3.9400	3.9460	3.2330
9/1/2001	3.4330	3.9400	3.9400	3.9460	3.2330
3/1/2001	3.4330	3.9400	3.9400	3.9460	3.2330
1/1/2001	3.4330	3.9400	3.9400	3.9460	3.2330
11/22/2000	3.4330	3.9400	3.9400	3.9460	3.2330
1/1/2000	3.4330	3.9400	3.9400	3.9460	3.2330
12/1/1999	3.4330	3.9400	3.9400	3.9460	3.2330
5/1/1999	3.4330	3.9400	3.9400	3.9460	3.2330
1/19/1999	3.9400	3.9400	3.9400	3.9460	3.2330
12/1/1996	3.9400	3.9400	3.9400	3.9460	3.2330
10/1/1996	3.9400	3.9400	3.9400	3.9460	3.2330
9/1/1995	3.9400	3.9400	3.9400	3.9460	3.2330
9/1/1994	3.9400	3.9400	3.9400	3.9460	3.2330
9/1/1993	3.9400	3.9400	3.9400	3.9460	3.2330

Note: the above rate prior to 9/1/03 were published in PGW's tariff in an amount that included \$3.18 related gas costs (i.e. the pre-9/1/03 rates above are net of the \$3.18).

EXHIBIT B

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

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

**PENNSYLVANIA PUBLIC UTILITY
COMMISSION** :

v.

Docket No. R-00061931

PHILADELPHIA GAS WORKS

AFFIDAVIT OF JUDITH L. MONDRE

COMMONWEALTH OF PENNSYLVANIA :

SS

COUNTY OF PHILADELPHIA :

JUDITH L. MONDRE, being duly sworn according to law, deposes and says as follows:

1. I am President of Mondre Energy, Inc., and offer this Affidavit in support of the Motion of Philadelphia Housing Authority (“PHA”) to Supplement the Record in the within matter.

2. I provided written, pre-filed Direct, Supplemental and Surrebuttal Testimony on behalf of PHA in this matter.

3. On May 22, 2007, Craig White of Philadelphia Gas Works (“PGW”) testified on cross-examination regarding historical gas rate data for the GS-Residential (“GS-R”), GS-Commercial (“GS-C”), GS-Industrial (“GS-I”), Municipal Service (“MS”) and PHA rate classes.

4. Part of Mr. White’s cross-examination related to an exhibit in his rebuttal testimony, CW-10, a copy of which is attached at Exhibit A to PHA’s motion.

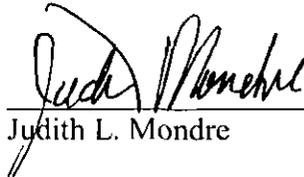
5. Exhibit CW-10 is a chart of historical rates for the above rate classes from September 1, 1993 to the present.

6. Mr. White testified that he could provide no information regarding the PHA rate prior to 1993.

7. In response to Mr. White's cross-examination, and in order to assist the Commission, I prepared a chart (the "MEI Chart"), annexed hereto as Appendix 1.

7. The MEI Chart consists of data for the GS-R, GS-C, GS-I, MS and PHA rate from January 1990 to May 2007. This data was provided by PGW and is a matter of public record.

8. The facts set forth in the MEI Chart and in the within Affidavit are true and correct to the best of my knowledge, information and belief.

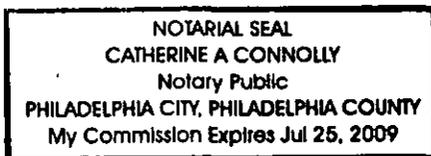


Judith L. Mondre

Sworn to and subscribed before me
This 24th day of May, 2007



Notary Public



**APPENDIX 1 – PGW HISTORICAL RATE
INFORMATION**

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

Firm Rates (\$/MCF)						
Month	GS Res	GS Com	GS Ind	PHA	MS	Firm Notes
Jan-90	6.9585	6.9585	6.9585		6.3475	
Feb-90	6.9585	6.9585	6.9585		6.3475	
Mar-90	6.9585	6.9585	6.9585		6.3475	
Apr-90	6.9585	6.9585	6.9585		6.3475	
May-90	6.9585	6.9585	6.9585		6.3475	
Jun-90	6.9585	6.9585	6.9585		6.3475	
Jul-90	6.9585	6.9585	6.9585		6.3475	
Aug-90	6.9585	6.9585	6.9585		6.3475	
Sep-90	6.9585	6.9585	6.9585		6.3475	
Oct-90	6.9585	6.9585	6.9585		6.3475	
Nov-90	6.9585	6.9585	6.9585		6.3475	
Dec-90	6.9585	6.9585	6.9585		6.3475	
Jan-91	6.9585	6.9585	6.9585		6.3475	
Feb-91	6.9585	6.9585	6.9585		6.3475	
Mar-91	6.8490	6.8490	6.8490		6.2380	
Apr-91	6.8490	6.8490	6.8490		6.2380	
May-91	6.8490	6.8490	6.8490		6.2380	
Jun-91	6.8490	6.8490	6.8490		6.2380	
Jul-91	6.8490	6.8490	6.8490		6.2380	
Aug-91	6.8490	6.8490	6.8490		6.2380	
Sep-91	7.3805	7.3805	7.3805		6.7695	
Oct-91	7.3805	7.3805	7.3805		6.7695	
Nov-91	7.3805	7.3805	7.3805		6.7695	

Dec-91	7.3805	7.3805	7.3805		6.7695	
Jan-92	7.3805	7.3805	7.3805		6.7695	
Feb-92	7.4765	7.4765	7.4765		6.7695	
Mar-92	7.4765	7.4765	7.4765		6.7695	
Apr-92	7.4765	7.4765	7.4765		6.7695	
May-92	7.4765	7.4765	7.4765		6.7695	
Jun-92	7.4765	7.4765	7.4765		6.7695	
Jul-92	7.4765	7.4765	7.4765		6.7695	
Aug-92	7.4765	7.4765	7.4765		6.7695	
Sep-92	7.4765	7.4765	7.4765	7.5335	6.7695	
Oct-92	7.4765	7.4765	7.4765	7.5335	6.7695	
Nov-92	7.4765	7.4765	7.4765	7.5335	6.7695	
Dec-92	7.5275	7.5275	7.5275	7.5335	6.8205	As of 12/8/92
Jan-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Feb-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Mar-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Apr-93	7.5275	7.5275	7.5275	7.5335	6.8205	
May-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Jun-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Jul-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Aug-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Sep-93	7.5275	7.5275	7.5275	7.8217	6.8205	
Oct-93	7.5275	7.5275	7.5275	7.8217	6.8205	
Nov-93	7.8157	7.8157	7.8157	7.8217	7.1087	As of 11/9/93
Dec-93	7.8157	7.8157	7.8157	7.8217	7.1087	
Jan-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Feb-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Mar-94	7.8157	7.8157	7.8157	7.8217	7.1087	

Apr-94	7.8157	7.8157	7.8157	7.8217	7.1087	
May-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Jun-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Jul-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Aug-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Sep-94	7.8157	7.8157	7.8157	7.8155	7.1087	
Oct-94	7.8157	7.8157	7.8157	7.8155	7.1087	
Nov-94	7.8157	7.8157	7.8157	7.8155	7.1087	
Dec-94	7.8095	7.8095	7.8095	7.8155	7.1025	As of 12/6/94
Jan-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Feb-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Mar-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Apr-95	7.8095	7.8095	7.8095	7.8155	7.1025	
May-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Jun-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Jul-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Aug-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Sep-95	7.8095	7.8095	7.8095	7.7800	7.1025	
Oct-95	7.8095	7.8095	7.8095	7.7800	7.1025	
Nov-95	7.8095	7.8095	7.8095	7.7800	7.1025	
Dec-95	7.8095	7.8095	7.8095	7.7800	7.1025	
Jan-96	7.8095	7.8095	7.8095	7.7800	7.1025	
Feb-96	7.8095	7.8095	7.8095	7.7800	7.1025	
Mar-96	7.8095	7.8095	7.8095	7.7800	7.1025	
Apr-96	7.7740	7.7740	7.7740	7.7800	7.0670	
May-96	7.7740	7.7740	7.7740	7.7800	7.0670	
Jun-96	7.7740	7.7740	7.7740	7.7800	7.0670	
Jul-96						

	7.7740	7.7740	7.7740	7.7800	7.0670	
Aug-96	7.7740	7.7740	7.7740	7.7800	7.0670	
Sep-96	7.7740	7.7740	7.7740	7.7800	7.0670	
Oct-96	8.7717	8.7717	8.7717	8.7777	8.0647	
Nov-96	8.7717	8.7717	8.7717	8.7777	8.0647	
Dec-96	8.5472	8.5472	8.5472	8.5532	7.8402	
Jan-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Feb-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Mar-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Apr-97	8.5472	8.5472	8.5472	8.5532	7.8402	
May-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Jun-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Jul-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Aug-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Sep-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Oct-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Nov-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Dec-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Jan-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Feb-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Mar-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Apr-98	8.5472	8.5472	8.5472	8.5532	7.8402	
May-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Jun-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Jul-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Aug-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Sep-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Oct-98	8.5472	8.5472	8.5472	8.5532	7.8402	

Nov-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Dec-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Jan-99	8.1314	8.1314	8.1314	8.1374	7.4244	As of 1/19/99
Feb-99	8.1314	8.1314	8.1314	8.1374	7.4244	
Mar-99	8.1314	8.1314	8.1314	8.1374	7.4244	
Apr-99	8.1314	8.1314	8.1314	8.1374	7.4244	
May-99	8.1314	8.1314	8.1314	8.1374	7.4244	
Jun-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Jul-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Aug-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Sep-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Oct-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Nov-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Dec-99	7.8524	8.3594	8.3594	8.3654	7.6524	
Jan-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Feb-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Mar-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Apr-00	7.7112	8.2182	8.2182	8.2242	7.5112	
May-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Jun-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Jul-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Aug-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Sep-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Oct-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Nov-00	9.6575	10.1645	10.1645	10.1705	9.4575	As of 11/22/00
Dec-00	9.6575	10.1645	10.1645	10.1705	9.4575	
Jan-01	12.8115	13.3185	13.3185	13.3245	12.6115	
Feb-01						

	12.8115	13.3185	13.3185	13.3245	12.6115	
Mar-01	13.3089	13.8159	13.8159	13.8219	13.1089	
Apr-01	13.3089	13.8159	13.8159	13.8219	13.1089	
May-01	13.3089	13.8159	13.8159	13.8219	13.1089	
Jun-01	13.3089	13.8159	13.8159	13.8219	13.1089	
Jul-01	13.3089	13.8159	13.8159	13.8219	13.1089	
Aug-01	13.3089	13.8159	13.8159	13.8219	13.1089	
Sep-01	10.9854	11.4924	11.4924	11.4984	10.7854	
Oct-01	11.2843	11.4924	11.4924	11.4984	10.7854	As of 10/13/01
Nov-01	11.2843	11.4924	11.4924	11.4984	10.7854	
Dec-01	10.0426	10.2507	10.2507	10.2567	9.5437	
Jan-02	10.0426	10.2507	10.2507	10.2567	9.5437	
Feb-02	10.0426	10.2507	10.2507	10.2567	9.5437	
Mar-02	8.6123	9.1403	9.1403	9.1463	8.4333	
Apr-02	9.3137	9.5919	9.5892	9.5815	8.4333	As of 4/12/02
May-02	9.3137	9.5919	9.5892	9.5815	8.4333	
Jun-02	10.0866	10.3648	10.3621	10.3544	9.2062	
Jul-02	10.0866	10.3648	10.3621	10.3544	9.2062	
Aug-02	10.0866	10.3648	10.3621	10.3544	9.2062	
Sep-02	10.5169	10.6101	10.6074	10.5997	9.4515	
Oct-02	10.5169	10.6101	10.6074	10.5997	9.4515	
Nov-02	10.5169	10.6101	10.6074	10.5997	9.4515	
Dec-02	11.0701	11.1633	11.1606	11.1529	10.0047	
Jan-03	11.0701	11.1633	11.1606	11.1529	10.0047	
Feb-03	11.0701	11.1633	11.1606	11.1529	10.0047	
Mar-03	11.7134	11.8066	11.8039	11.7962	10.6480	
Apr-03	12.5384	12.6316	12.6289	12.6212	11.4730	As of 4/11/03
May-03	12.5384	12.6316	12.6289	12.6212	11.4730	

Jun-03	13.2471	13.3403	13.3376	13.3299	12.1817	
Jul-03	13.2471	13.3403	13.3376	13.3299	12.1817	
Aug-03	13.2471	13.3403	13.3376	13.3299	12.1817	
Sep-03	13.4033	13.4965	13.4938	13.4861	12.3379	
Oct-03	13.4033	13.4965	13.4938	13.4861	12.3379	
Nov-03	13.4033	13.4965	13.4938	13.4861	12.3379	
Dec-03	12.9877	13.0809	13.0782	13.0705	11.9223	
Jan-04	12.9877	13.0809	13.0782	13.0705	11.9223	
Feb-04	12.9877	13.0809	13.0782	13.0705	11.9223	
Mar-04	13.3189	13.4121	13.4094	13.4017	12.2535	
Apr-04	13.3189	13.4121	13.4094	13.4017	12.2535	
May-04	13.3189	13.4121	13.4094	13.4017	12.2535	
Jun-04	13.9627	14.0559	14.0532	14.0455	12.8973	
Jul-04	13.9627	14.0559	14.0532	14.0455	12.8973	
Aug-04	13.9627	14.0559	14.0532	14.0455	12.8973	
Sep-04	14.0993	14.1925	14.1898	14.1821	13.0339	
Oct-04	14.0993	14.1925	14.1898	14.1821	13.0339	
Nov-04	14.0993	14.1925	14.1898	14.1821	13.0339	
Dec-04	15.6905	15.7837	15.7810	15.7733	14.6251	
Jan-05	15.6905	15.7837	15.7810	15.7733	14.6251	
Feb-05	15.6905	15.7837	15.7810	15.7733	14.6251	
Mar-05	13.9027	13.9959	13.9932	13.9855	12.8373	
Apr-05	13.9027	13.9959	13.9932	13.9855	12.8373	
May-05	13.9027	13.9959	13.9932	13.9855	12.8373	
Jun-05	15.0686	15.1618	15.1591	15.1514	14.0032	
Jul-05	15.0686	15.1618	15.1591	15.1514	14.0032	
Aug-05	15.0686	15.1618	15.1591	15.1514	14.0032	

Sep-05	15.8738	15.9670	15.9643	15.9566	14.8084	
Oct-05	19.2250	19.3182	19.3155	19.3078	18.1596	Effective 10/7
Nov-05	19.2250	19.3182	19.3155	19.3078	18.1596	
Dec-05	19.2250	19.3182	19.3155	19.3078	18.1596	
Jan-06	19.2250	19.3182	19.3155	19.3078	18.1596	
Feb-06	19.2250	19.3182	19.3155	19.3078	18.1596	
Mar-06	19.2250	19.3182	19.3155	19.3078	18.1596	
Apr-06	19.2250	19.3182	19.3155	19.3078	18.1596	
May-06	19.2250	19.3182	19.3155	19.3078	18.1596	
Jun-06	18.2961	18.3893	18.3866	18.3789	17.2307	
Jul-06	18.2961	18.3893	18.3866	18.3789	17.2307	
Aug-06	18.2961	18.3893	18.3866	18.3789	17.2307	
Sep-06	18.2852	18.3784	18.3757	18.3680	17.2198	
Oct-06	18.2852	18.3784	18.3757	18.3680	17.2198	
Nov-06	18.2852	18.3784	18.3757	18.3680	17.2198	
Dec-06	17.5859	17.6791	17.6764	17.6687	16.5205	
Jan-07	17.5859	17.6791	17.6764	17.6687	16.5205	
Feb-07	17.5859	17.6791	17.6764	17.6687	16.5205	
Mar-07	17.3917	17.4849	17.4822	17.4745	16.3263	
Apr-07	17.3917	17.4849	17.4822	17.4745	16.3263	
May-07	17.3917	17.4849	17.4822	17.4745	16.3263	

Firm Rates (\$/MCF)						
Month	GS Res	GS Com	GS Ind	PHA	MS	Firm Notes
Jan-90	6.9585	6.9585	6.9585		6.3475	
Feb-90	6.9585	6.9585	6.9585		6.3475	
Mar-90	6.9585	6.9585	6.9585		6.3475	
Apr-90	6.9585	6.9585	6.9585		6.3475	
May-90	6.9585	6.9585	6.9585		6.3475	
Jun-90	6.9585	6.9585	6.9585		6.3475	
Jul-90	6.9585	6.9585	6.9585		6.3475	
Aug-90	6.9585	6.9585	6.9585		6.3475	
Sep-90	6.9585	6.9585	6.9585		6.3475	
Oct-90	6.9585	6.9585	6.9585		6.3475	
Nov-90	6.9585	6.9585	6.9585		6.3475	
Dec-90	6.9585	6.9585	6.9585		6.3475	
Jan-91	6.9585	6.9585	6.9585		6.3475	
Feb-91	6.9585	6.9585	6.9585		6.3475	
Mar-91	6.8490	6.8490	6.8490		6.2380	
Apr-91	6.8490	6.8490	6.8490		6.2380	
May-91	6.8490	6.8490	6.8490		6.2380	
Jun-91	6.8490	6.8490	6.8490		6.2380	
Jul-91	6.8490	6.8490	6.8490		6.2380	
Aug-91	6.8490	6.8490	6.8490		6.2380	
Sep-91	7.3805	7.3805	7.3805		6.7695	
Oct-91	7.3805	7.3805	7.3805		6.7695	
Nov-91	7.3805	7.3805	7.3805		6.7695	
Dec-91	7.3805	7.3805	7.3805		6.7695	
Jan-92	7.3805	7.3805	7.3805		6.7695	
Feb-92	7.4765	7.4765	7.4765		6.7695	
Mar-92	7.4765	7.4765	7.4765		6.7695	
Apr-92	7.4765	7.4765	7.4765		6.7695	
May-92	7.4765	7.4765	7.4765		6.7695	
Jun-92	7.4765	7.4765	7.4765		6.7695	
Jul-92	7.4765	7.4765	7.4765		6.7695	
Aug-92	7.4765	7.4765	7.4765		6.7695	
Sep-92	7.4765	7.4765	7.4765	7.5335	6.7695	
Oct-92	7.4765	7.4765	7.4765	7.5335	6.7695	
Nov-92	7.4765	7.4765	7.4765	7.5335	6.7695	
Dec-92	7.5275	7.5275	7.5275	7.5335	6.8205	As of 12/8/92
Jan-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Feb-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Mar-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Apr-93	7.5275	7.5275	7.5275	7.5335	6.8205	
May-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Jun-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Jul-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Aug-93	7.5275	7.5275	7.5275	7.5335	6.8205	
Sep-93	7.5275	7.5275	7.5275	7.8217	6.8205	
Oct-93	7.5275	7.5275	7.5275	7.8217	6.8205	
Nov-93	7.8157	7.8157	7.8157	7.8217	7.1087	As of 11/9/93

Dec-93	7.8157	7.8157	7.8157	7.8217	7.1087	
Jan-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Feb-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Mar-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Apr-94	7.8157	7.8157	7.8157	7.8217	7.1087	
May-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Jun-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Jul-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Aug-94	7.8157	7.8157	7.8157	7.8217	7.1087	
Sep-94	7.8157	7.8157	7.8157	7.8155	7.1087	
Oct-94	7.8157	7.8157	7.8157	7.8155	7.1087	
Nov-94	7.8157	7.8157	7.8157	7.8155	7.1087	
Dec-94	7.8095	7.8095	7.8095	7.8155	7.1025	As of 12/6/94
Jan-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Feb-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Mar-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Apr-95	7.8095	7.8095	7.8095	7.8155	7.1025	
May-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Jun-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Jul-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Aug-95	7.8095	7.8095	7.8095	7.8155	7.1025	
Sep-95	7.8095	7.8095	7.8095	7.7800	7.1025	
Oct-95	7.8095	7.8095	7.8095	7.7800	7.1025	
Nov-95	7.8095	7.8095	7.8095	7.7800	7.1025	
Dec-95	7.8095	7.8095	7.8095	7.7800	7.1025	
Jan-96	7.8095	7.8095	7.8095	7.7800	7.1025	
Feb-96	7.8095	7.8095	7.8095	7.7800	7.1025	
Mar-96	7.8095	7.8095	7.8095	7.7800	7.1025	
Apr-96	7.7740	7.7740	7.7740	7.7800	7.0670	
May-96	7.7740	7.7740	7.7740	7.7800	7.0670	
Jun-96	7.7740	7.7740	7.7740	7.7800	7.0670	
Jul-96	7.7740	7.7740	7.7740	7.7800	7.0670	
Aug-96	7.7740	7.7740	7.7740	7.7800	7.0670	
Sep-96	7.7740	7.7740	7.7740	7.7800	7.0670	
Oct-96	8.7717	8.7717	8.7717	8.7777	8.0647	
Nov-96	8.7717	8.7717	8.7717	8.7777	8.0647	
Dec-96	8.5472	8.5472	8.5472	8.5532	7.8402	
Jan-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Feb-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Mar-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Apr-97	8.5472	8.5472	8.5472	8.5532	7.8402	
May-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Jun-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Jul-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Aug-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Sep-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Oct-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Nov-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Dec-97	8.5472	8.5472	8.5472	8.5532	7.8402	
Jan-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Feb-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Mar-98	8.5472	8.5472	8.5472	8.5532	7.8402	

Apr-98	8.5472	8.5472	8.5472	8.5532	7.8402	
May-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Jun-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Jul-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Aug-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Sep-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Oct-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Nov-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Dec-98	8.5472	8.5472	8.5472	8.5532	7.8402	
Jan-99	8.1314	8.1314	8.1314	8.1374	7.4244	As of 1/19/99
Feb-99	8.1314	8.1314	8.1314	8.1374	7.4244	
Mar-99	8.1314	8.1314	8.1314	8.1374	7.4244	
Apr-99	8.1314	8.1314	8.1314	8.1374	7.4244	
May-99	8.1314	8.1314	8.1314	8.1374	7.4244	
Jun-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Jul-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Aug-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Sep-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Oct-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Nov-99	7.6244	8.1314	8.1314	8.1374	7.4244	
Dec-99	7.8524	8.3594	8.3594	8.3654	7.6524	
Jan-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Feb-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Mar-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Apr-00	7.7112	8.2182	8.2182	8.2242	7.5112	
May-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Jun-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Jul-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Aug-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Sep-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Oct-00	7.7112	8.2182	8.2182	8.2242	7.5112	
Nov-00	9.6575	10.1645	10.1645	10.1705	9.4575	As of 11/22/00
Dec-00	9.6575	10.1645	10.1645	10.1705	9.4575	
Jan-01	12.8115	13.3185	13.3185	13.3245	12.6115	
Feb-01	12.8115	13.3185	13.3185	13.3245	12.6115	
Mar-01	13.3089	13.8159	13.8159	13.8219	13.1089	
Apr-01	13.3089	13.8159	13.8159	13.8219	13.1089	
May-01	13.3089	13.8159	13.8159	13.8219	13.1089	
Jun-01	13.3089	13.8159	13.8159	13.8219	13.1089	
Jul-01	13.3089	13.8159	13.8159	13.8219	13.1089	
Aug-01	13.3089	13.8159	13.8159	13.8219	13.1089	
Sep-01	10.9854	11.4924	11.4924	11.4984	10.7854	
Oct-01	11.2843	11.4924	11.4924	11.4984	10.7854	As of 10/13/01
Nov-01	11.2843	11.4924	11.4924	11.4984	10.7854	
Dec-01	10.0426	10.2507	10.2507	10.2567	9.5437	
Jan-02	10.0426	10.2507	10.2507	10.2567	9.5437	
Feb-02	10.0426	10.2507	10.2507	10.2567	9.5437	
Mar-02	8.6123	9.1403	9.1403	9.1463	8.4333	
Apr-02	9.3137	9.5919	9.5892	9.5815	8.4333	As of 4/12/02
May-02	9.3137	9.5919	9.5892	9.5815	8.4333	
Jun-02	10.0866	10.3648	10.3621	10.3544	9.2062	
Jul-02	10.0866	10.3648	10.3621	10.3544	9.2062	

Aug-02	10.0866	10.3648	10.3621	10.3544	9.2062	
Sep-02	10.5169	10.6101	10.6074	10.5997	9.4515	
Oct-02	10.5169	10.6101	10.6074	10.5997	9.4515	
Nov-02	10.5169	10.6101	10.6074	10.5997	9.4515	
Dec-02	11.0701	11.1633	11.1606	11.1529	10.0047	
Jan-03	11.0701	11.1633	11.1606	11.1529	10.0047	
Feb-03	11.0701	11.1633	11.1606	11.1529	10.0047	
Mar-03	11.7134	11.8066	11.8039	11.7962	10.6480	
Apr-03	12.5384	12.6316	12.6289	12.6212	11.4730	As of 4/11/03
May-03	12.5384	12.6316	12.6289	12.6212	11.4730	
Jun-03	13.2471	13.3403	13.3376	13.3299	12.1817	
Jul-03	13.2471	13.3403	13.3376	13.3299	12.1817	
Aug-03	13.2471	13.3403	13.3376	13.3299	12.1817	
Sep-03	13.4033	13.4965	13.4938	13.4861	12.3379	
Oct-03	13.4033	13.4965	13.4938	13.4861	12.3379	
Nov-03	13.4033	13.4965	13.4938	13.4861	12.3379	
Dec-03	12.9877	13.0809	13.0782	13.0705	11.9223	
Jan-04	12.9877	13.0809	13.0782	13.0705	11.9223	
Feb-04	12.9877	13.0809	13.0782	13.0705	11.9223	
Mar-04	13.3189	13.4121	13.4094	13.4017	12.2535	
Apr-04	13.3189	13.4121	13.4094	13.4017	12.2535	
May-04	13.3189	13.4121	13.4094	13.4017	12.2535	
Jun-04	13.9627	14.0559	14.0532	14.0455	12.8973	
Jul-04	13.9627	14.0559	14.0532	14.0455	12.8973	
Aug-04	13.9627	14.0559	14.0532	14.0455	12.8973	
Sep-04	14.0993	14.1925	14.1898	14.1821	13.0339	
Oct-04	14.0993	14.1925	14.1898	14.1821	13.0339	
Nov-04	14.0993	14.1925	14.1898	14.1821	13.0339	
Dec-04	15.6905	15.7837	15.7810	15.7733	14.6251	
Jan-05	15.6905	15.7837	15.7810	15.7733	14.6251	
Feb-05	15.6905	15.7837	15.7810	15.7733	14.6251	
Mar-05	13.9027	13.9959	13.9932	13.9855	12.8373	
Apr-05	13.9027	13.9959	13.9932	13.9855	12.8373	
May-05	13.9027	13.9959	13.9932	13.9855	12.8373	
Jun-05	15.0686	15.1618	15.1591	15.1514	14.0032	
Jul-05	15.0686	15.1618	15.1591	15.1514	14.0032	
Aug-05	15.0686	15.1618	15.1591	15.1514	14.0032	
Sep-05	15.8738	15.9670	15.9643	15.9566	14.8084	
Oct-05	19.2250	19.3182	19.3155	19.3078	18.1596	Effective 10/7
Nov-05	19.2250	19.3182	19.3155	19.3078	18.1596	
Dec-05	19.2250	19.3182	19.3155	19.3078	18.1596	
Jan-06	19.2250	19.3182	19.3155	19.3078	18.1596	
Feb-06	19.2250	19.3182	19.3155	19.3078	18.1596	
Mar-06	19.2250	19.3182	19.3155	19.3078	18.1596	
Apr-06	19.2250	19.3182	19.3155	19.3078	18.1596	
May-06	19.2250	19.3182	19.3155	19.3078	18.1596	
Jun-06	18.2961	18.3893	18.3866	18.3789	17.2307	
Jul-06	18.2961	18.3893	18.3866	18.3789	17.2307	
Aug-06	18.2961	18.3893	18.3866	18.3789	17.2307	
Sep-06	18.2852	18.3784	18.3757	18.3680	17.2198	
Oct-06	18.2852	18.3784	18.3757	18.3680	17.2198	
Nov-06	18.2852	18.3784	18.3757	18.3680	17.2198	

Dec-06	17.5859	17.6791	17.6764	17.6687	16.5205	
Jan-07	17.5859	17.6791	17.6764	17.6687	16.5205	
Feb-07	17.5859	17.6791	17.6764	17.6687	16.5205	
Mar-07	17.3917	17.4849	17.4822	17.4745	16.3263	
Apr-07	17.3917	17.4849	17.4822	17.4745	16.3263	
May-07	17.3917	17.4849	17.4822	17.4745	16.3263	

CERTIFICATE OF SERVICE

I hereby certify that I am serving a true and correct copy of the foregoing Motion of Philadelphia Housing Authority to Supplement Record in accordance with the requirements of 52 Pa.Code §1.54 upon the following person(s) via First Class Mail, postage prepaid:

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MAY 25 2007

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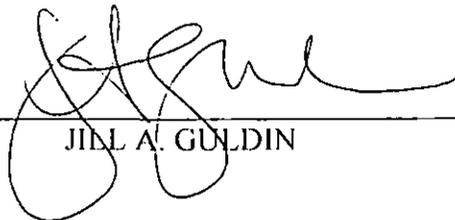
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JILL A. GULDIN

Dated: May 25, 2007

Philadelphia Gas Works

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Senior Attorney



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ORIGINAL

May 30, 2007

VIA OVERNIGHT DELIVERY

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400 North Street
Harrisburg, PA 17120

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MAY 30 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R00061931

Dear Secretary McNulty,

Please find enclosed the original and three (3) copies of Philadelphia Gas Works' Answer to Philadelphia Housing Authority's Motion to Supplement Record.

**DOCUMENT
FOLDER**

Respectfully Submitted,

Gregory J. Stunder

Enclosure

cc: Attached Certificate of Service w/enc.

Administrative Law Judge Cynthia Williams Fordham, w/enc.

Administrative Law Judge Angela Jones, w/enc

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MAY 30 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Pennsylvania Public Utility Commission

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R-00061931

v.

R-00061931C0001 et al.

Philadelphia Gas Works

**PHILADELPHIA GAS WORKS' ANSWER TO THE MOTION OF PHILADELPHIA
HOUSING AUTHORITY TO SUPPLEMENT RECORD**

Philadelphia Gas Works ("PGW"), by and through its undersigned counsel, respectfully submits this Answer to and Request to Deny Philadelphia Housing Authority's ("PHA") Motion to Supplement Record. In answer thereto, PGW avers as follows:

1. Admitted.

2. Admitted.

3. Admitted that Exhibit CW-10 was discussed during the cross-examination of Craig

White. By way of further answer: Exhibit CW-10 was submitted as an exhibit in Mr.

White's rebuttal testimony on May 4, 2007; PHA filed the surrebuttal testimony of Judith

Mondre on May 15, 2007 which did not include any data that it now seeks to include in

the record; and PHA filed the amended surrebuttal testimony of Judith Mondre on May

16, 2007 which did not include any data that it now seeks to include in the record.

4. No response is required. Exhibit CW-10, included as Exhibit A of PHA's motion, speaks for itself.

5. As of the date of this Answer, PGW does not have the benefit of the hearing transcript which would permit PGW to be fully responsive to this paragraph but the Company does admit that Mr. White had a limited ability to respond to questions regarding the history of

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the PHA Rate outside of the context of the fifteen (15) years of data provided in Exhibit CW-10.

6. Denied. The data contained in PHA's motion in Appendix 1 is not responsive to Mr. White's cross-examination. Rather, it is responsive to Mr. White's rebuttal testimony submitted on May 4, 2007 which included Exhibit CW-10. Furthermore, although PHA had the opportunity to respond to Exhibit CW-10 in its surrebuttal testimony, PHA did not do so when it filed the surrebuttal testimony of Judith Mondre on May 15, 2007 and the amended surrebuttal testimony of Judith Mondre on May 16, 2007.
7. As for PHA's representation in the first sentence of this paragraph: admitted to the extent that the data is consistent with the data provided in Exhibit CW-10 and denied to the extent that the data is inconsistent with Exhibit CW-10 or outside of the time period represented in Exhibit CW-10. As for PHA's representation in the second sentence of this paragraph: PHA does not provide enough information in its Motion regarding the source of the data and the circumstances under which PHA obtained the data in order for PGW to admit or deny that PGW provided the data and that the data is a matter of public record.
8. Denied. The MEI chart is not admissible because: its admission is violative of both 52 Pa.Code § 5.242 and 52 Pa.Code § 5.243; it should have been submitted with PHA's surrebuttal testimony filed on May 15, 2007; submission by PHA on May 15, 2007 would have provided PGW the opportunity to determine if the Company wanted to cross-examine Ms. Mondre about the data; submission by PHA on May 15, 2007 would have provided PGW the opportunity to cross-examine Ms. Mondre with regard to the data during the scheduled hearing dates; and PHA does not provide enough information in its

Motion and the affidavit of Judith Mondre regarding the source of the data and the circumstances under which PHA obtained the data in order for PGW to admit or deny that PGW provided the data and that the data is a matter of public record.

9. No response is required.

Discussion

PHA's Motion is another attempt to circumvent the Pennsylvania Public Utility Code's Procedural Rules which PHA initially attempted to dodge during the hearings when it tried to present prohibited surrejoinder testimony. The rules are clear on this matter. The Pennsylvania Code states that:

(a) In a proceeding, the party having the burden of proof, shall open and close unless otherwise directed by the presiding officer. In a hearing on investigations and in proceedings which have been consolidated for hearing, the presiding officer may direct who will open and close. Oral rejoinder, if proposed by the party with the burden of proof, shall be completed before any cross-examination of the witness is conducted.

52 Pa.Code § 5.242. PGW has the burden of proof in this matter, therefore, admission of the data contained in PHA's Motion not only provides PHA the opportunity to improperly "close" in this matter, it denies PGW the opportunity to cross-examine the sponsoring witness with regard to the data.

Furthermore, PHA's claim that it is offering the data contained in Appendix 1 in response to Mr. White's cross-examination is patently false. Mr. White's cross-examination occurred on May 22, 2007 but Exhibit CW-10 was **not** presented to the parties for the first time on May 22, 2007. Rather, Exhibit CW-10 was included in Mr. White's rebuttal testimony on May 4, 2007. Furthermore, the procedural schedule provided an opportunity to respond to both Mr. White's testimony and Exhibit CW-10 in the form of surrebuttal testimony on May 15, 2007. If PHA

wanted to augment the record with more expansive data than contained in Exhibit CW-10, it had the opportunity to do so when it filed surrebuttal testimony on May 15, 2007 and amended surrebuttal testimony on May 16, 2007.

Regardless of PHA's many opportunities to properly respond to PGW's rebuttal testimony, the Pennsylvania Code provides unambiguous direction in this matter as follows:

(e) A party will not be permitted to introduce evidence during a rebuttal phase which:

...

(2) Should have been included in the party's case-in-chief .

52 Pa.Code § 5.243. Clearly, the only acceptable point in this proceeding for PHA to offer the data contained in Appendix 1 of this Motion was the surrebuttal phase, therefore, the data "should have been included" in its surrebuttal testimony submitted on May 15 and May 16, 2007.

WHEREFORE, PGW respectfully requests that PHA's Motion to Supplement Record be denied.

Respectfully submitted,



Gregory J. Stunder, Esquire
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Philadelphia, PA 19122

(215) 684-6878

Date: May 30, 2007

CERTIFICATE OF SERVICE

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

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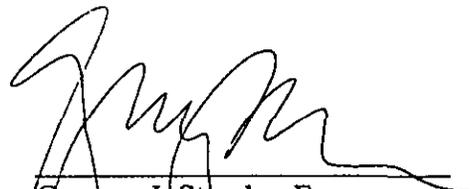
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May 31, 2007

VIA FEDERAL EXPRESS

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

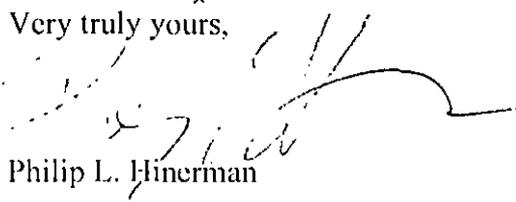
Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00061931

Dear Secretary:

Enclosed for filing is an original and three (3) copies each of the Motion to File Reply Memorandum of Philadelphia Housing Authority as well as the Response of Philadelphia Housing Authority to PGWs' Reply in the above-captioned proceeding,

Copies are being served on all active parties of record.

Very truly yours,


Philip L. Hinerman

PLH/mn

Enclosures

cc: The Honorable Cynthia W. Fordham (w/encl.)
The Honorable Angela T. Jones (w/encl.)
Parties of Record (w/encl.)

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

PENNSYLVANIA PUBLIC UTILITY
COMMISSION :

v. :

Docket No. R-00061931

PHILADELPHIA GAS WORKS :

**MOTION TO FILE REPLY MEMORANDUM
OF PHILADELPHIA HOUSING AUTHORITY**

The Philadelphia Housing Authority ("PHA"), by counsel, respectfully moves to be allowed to file a reply to the Philadelphia Gas Works' Answer to the Motion of the Philadelphia Housing Authority to Supplement Record. The reasons are as follows:

1. By e-mail request of May 29, 2007, Gregory Stunder, counsel for Philadelphia Gas Works, requested the right to file an Answer to PHA's Motion for Supplement the Record.
2. By e-mail of May 29, 2007, Judges Fordham and Jones granted Mr. Stunder's request and did not discuss PHA's right to reply.
3. On May 30, 2007, PGW responded to PHA's Motion.
4. PHA has drafted a short Reply to PGWs' response.
5. The Reply addresses issues raised by PGW.
6. A copy of the requested Reply is attached hereto as Exhibit "A".

DOCKETED
JUN 4 2007

DOCUMENT
FOLDER

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7. PHA requests the right to file the Reply.

Respectfully submitted,



PHILIP L. HINERMAN, ESQUIRE, I.D. #55496

JILL A. GULDIN, ESQUIRE, I.D. #93657

FOX ROTHSCHILD LLP

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Attorney for Petitioner,

PHILADELPHIA HOUSING AUTHORITY

Dated: May 31, 2007

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

PENNSYLVANIA PUBLIC UTILITY
COMMISSION :

v. :

PHILADELPHIA GAS WORKS :

Docket No. R-00061931

**RESPONSE OF PHILADELPHIA
HOUSING AUTHORITY TO PGWS' REPLY**

The Philadelphia Housing Authority ("PHA") responds to the Answer of Philadelphia Gas Works' to PHA's Motion to Supplement Record. PHA's Motion is misconstrued by PGW.

In this Commission's review, consideration should be given to the following:

1. PHA does not wish to introduce additional testimony – just an historic chart containing public information regarding gas rates.
2. The data contained in the chart is obtained from PGW files.
3. PGW does not deny the data is correct.
4. The chart is offered for the convenience of the Commission.
5. The chart does not contract testimony of PGWs' Craig White. It merely adds more information.
6. By using only historic PGW data, PGW has not been prejudiced.
7. PHA does not seek to add testimony.

The Motion was attached accompanied by an affidavit from Ms. Mondre. That affidavit merely explains the source of the data. The data and affidavit does not contain an opinion or additional testimony. In fact, the Motion merely requests that the chart be entered into evidence, not that any additional testimony be provided.

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PGW has opposed entry of a chart of historic rates solely on procedural grounds. It is not clear why PGW would not wish the Commission to have the information on the chart.

PGW's concerns that it would not be allowed to open and close pursuant to 52 PA Code § 5.242(a) are satisfied as no testimony is added. Admission of this chart is consistent with 52 Pa. Code § 5.243(a) which states that a party has a right of presentation of a motion or evidence.

If this material had been obtained from a source other than PGW, PGW would have asserted some grounds of prejudice. Again, the information is not at odds with Mr. White's testimony. The chart is not testimony. It is not surrebuttal testimony. It is merely a compilation of information obtained from PGW's rate records.

2 Pa. C.S. § 505 allows the Commission to receive records of reasonably relevant value. Historic rates are a relevant issue in a rate increase proceeding. Rather than counsel arguing the rates for the first time in briefing, we are requesting that the document be entered formally.

Counsel are free to make any arguments that they may feel are necessary regarding this historic rate table. However, it is important to note that PHA does not seek to supplement or amend any of the testimony of its witnesses in connection with admission of this chart.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "P. L. Hinerman", written over a horizontal line.

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Attorney for Petitioner,
PHILADELPHIA HOUSING AUTHORITY

Dated: May 31, 2007

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I am serving a true and correct copy of the foregoing
Reply Memorandum of Philadelphia Housing Authority in accordance with the requirements of

52 Pa. Code §1.54 upon the following person(s) via First Class Mail, postage prepaid:

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PHILIP L. HINERMAN

Dated: May 31, 2007