

ORIGINAL

R-00072110

Docket R-07XXX

Volume 2

Philadelphia Gas Works

DOCUMENT
FOLDER

Before The

Pennsylvania Public Utility Commission

Computation of Annual Purchased Gas Costs
For Twelve Months Ending August 31, 2008

DOCKETED

FEB 08 2007

66 Pa.C.S. § 1307(f)

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Information Submitted Pursuant To:

66 Pa.C.S. §§ 1307(f), 1317, 1318 and
52 Pa. Code § 53.61, et seq.

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

February 1, 2007

Philadelphia Gas Works 1307f - 2006 Prefiling

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Philadelphia Gas Works

Pennsylvania Public Utility Commission
52 Pa. Code §53.61. et seq.

Item 53.64(c) Thirty days prior to the filing of a tariff reflecting an increase or decrease in natural gas costs, each Section 1307(f) gas utility seeking recovery of purchased gas costs under that section shall provide notice to the public, under § 53.68 (relating to notice requirements), and shall file the following supporting information with the Commission, with a copy to the Consumer Advocate, Small Business Advocate and to intervenors upon request:

- (5) A listing and updating, if necessary, of projections of gas supply and demand provided to the Commission for any purpose—see § 59.67 (relating to formats). In addition, provide an accounting of the difference between reported gas supply available and gas supply deliverable—including storage—from the utility to its customers under various circumstances and time periods.

Response:

Please see the attached document. PGW's next Annual Resource Planning Report (Forms 1 and 2) is due for submission to the Commission on March 1, 2007 and an updated Annual Resource Planning Report is not available at this time.

ANNUAL RESOURCE PLANNING REPORT

Philadelphia Gas Works

Philadelphia, Pennsylvania

March 2006

Forms 1 & 2

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

**Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, Pennsylvania 19122**

ANNUAL RESOURCE PLANNING REPORT

MARCH 2006

Forms 1 & 2

**Information Submitted in Compliance with and Pursuant to Title 52
Pennsylvania Code Section 59.81**

PHILADELPHIA GAS WORKS

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<u>EXHIBIT NO.</u>	<u>REGULATION</u>	<u>DESCRIPTION</u>
1	59.81	General
2	59.81	Forms IRP-Gas 1A, and 1B Annual and Peak Day Energy Demand
3	59.81	Forms IRP-Gas 2A, 2B, and 2C Annual and Peak Day Energy Resources, And transmission and storage contracts

Section 59.81: **General**

Pursuant to Section 59.81 (a), each major jurisdictional gas utility must file an annual resource planning report (ARPR) on or before June 1, 1996 and June 1 of each succeeding year, except Form 1A/2A which filing date is March 1. One (1) original and seven (7) copies of the report must be submitted to:

Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

One copy should be submitted unbound for ease of duplication.

One courtesy copy should also be submitted to:

Pennsylvania Public Utility Commission
Conservation, Economics and Energy Planning
P.O. Box 3265
Harrisburg, PA 17105-3265
Attn. Calvin Birge

Also submit one (1) copy to the following:

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1921

Office of Small Business Advocate
Suite 1102, Commerce Building
300 N. Second Street
Harrisburg, PA 17101

Be sure to indicate the name and telephone number of at least one individual at the company who is familiar with the filing and will be available to answer any questions the Commission staff may have. You may also wish to list those individuals who are directly involved in the preparation of the various document components.

Information contained in annual resource planning reports must be utility-specific. The report should follow an outline similar to that which is contained herein, with narrative accompanying the required data. Forms may be modified to accommodate wide columns of numbers and enhance readability, but the general format should be used to maintain consistency.

This information is not generally considered confidential. Utilities are obligated to provide complete information. However, we will treat as confidential those portions of the report designated by the utility as proprietary. If a utility's proprietary claim is challenged, the Commission will direct the utility to file a petition for protective order pursuant to 52 PA Code 5.423.

All questions concerning the reporting requirements for Forms IRP Gas 1A through 9 should be addressed to Pennsylvania Public Utility Commission Bureau of Conservation, Economics and Energy Planning.

Response:

An original, seven (7) copies, and one unbound copy of Forms 1A, 1B, 2A, 2b, and 2C along with a general discussion of the methodologies, data sources, and assumptions are being submitted to meet the requirements of the March 1 filing.

All questions concerning the ARPR should be directed to Mr. Kenneth Dybalski, Manager - Gas Planning at (215) 684-6317. The following individual is available to answer questions concerning Forms 1 and 2:
Ms. Maria Hogan, Administrator - Gas Planning at (215) 684-6618.

Section 59.81 **Forms IRP-Gas 1A, and 1B – Annual and Peak Day Demand**

The load growth projections shall reflect the effects of price elasticity, market induced conservation, building and appliance efficiency standards, and the effects of the utility's existing and planned conservation and load management activities.

Response: Please see the attached documentation and forms.

Section 59.81

Forms IRP-Gas 2A, 2B and 2C - Annual and Peak Day Energy Resources, Transmission and Storage Contracts

The forecast of energy sources shall indicate sources of all presently available and new supplies which the utility estimates will become available, displayed by component parts.

Response:

Please see the attached documentation and forms.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

**PHILADELPHIA GAS WORKS
800 WEST MONTGOMERY AVENUE
PHILADELPHIA, PENNSYLVANIA**

Annual Resource Planning Summary Report

Filed: March 2006

**Information Submitted in Compliance with and Pursuant to Title 52
Pennsylvania Code Sections 59.81-59.84**

PHILADELPHIA GAS WORKS

2006 Annual Resource Planning Summary Report

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INTRODUCTION

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SECTION II -- Supply Forecasting Methodology and Assumptions

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SECTION IV -- Design Day Forecasting Methodology and Assumptions

SECTION V -- PGW Corporate Modeling System

Introduction

By Order entered January 11, 1996, the Pennsylvania Public Utility Commission (PUC) adopted final regulations (52 PA Code §§ 59.81 - 59.84) which set forth revised requirements for filing an Annual Resource Planning Report (the Plan). The Plan submitted represents Philadelphia Gas Works' (PGW or the Company) belief that integrated resource planning (IRP) is a workable approach to utility planning.

This plan summary contains historical data and projections for annual, winter and peak day supply to meet projected customer requirements in a least cost manner, while ensuring adequate and reliable service. It is organized into the following 5 sections:

- I. PGW's Overall Approach to Integrated Resource Planning
- II. Supply Forecasting Methodology and Assumptions
- III. Demand Forecasting Methodology and Assumptions
- IV. Design Day Forecasting Methodology and Assumptions
- V. PGW Corporate Modeling System

I. PGW's Overall Approach to Integrated Resource Planning

PGW Optimization Standard for Purchasing and Utilizing Gas Supplies

As reasonably anticipated PGW intends on meeting its contractual obligations to supply all of its current firm customers in its service territory on the coldest day, throughout the heating season and throughout the year. Projected customer requirements for design day and design winter conditions form the basis for capacity commitments for pipeline supply, storage, and transportation contracting.

Natural gas supplies are purchased under a portfolio approach with PGW intending to secure the lowest overall price consistent with the corporate goals of reliability and security of supply. In addition, consideration is given to maintaining a diversity of sources and types of supply, coupled with contractual and operational flexibility on both a daily and seasonal basis. Short term purchases from spot market sources are utilized to the maximum degree that they are more economical, available, and transportable.

Natural gas supplies are utilized so as to minimize gas costs subject to reliability constraints. Supply contract obligations are honored and prudent Gas Control operational requirements are assumed. Storage gas is drawn down so as to always maintain an inventory level sufficient for the remaining winter in the event that design temperature conditions should occur in the remaining segment of the winter season. Within the above parameters, priority is given to utilizing the most economical sources of supply first within the context of preserving the capability of meeting seasonal and annual demands rather than the momentary daily requirements. All facilities and sources of supply - flowing, storage and LNG are available to achieve the intended end, namely, minimizing gas costs subject to reliability constraints.

II. Supply Forecasting Methodology and Assumptions Basic Assumptions

The PGW Gas Supply Policy Committee comprised of senior corporate management as well as Gas Planning, Gas Control, Gas Supply, and Regulatory departmental management, approved the aforementioned Optimization Standard for Purchasing and Utilizing Gas Supplies (Section I). All natural gas purchases continue to be made in accordance with this standard. Projected sales, revenues and natural gas expenses in this report result from this agreement, particularly in the areas of inventory valuation, priorities of gas selection and interruptible supply availability.

Incorporated into our projections are additional implementation steps involved with developing a cohesive gas supply/demand strategy for the near term and the longer range. These include developing a cost relationship comparison for current resources and a review of current contract terms and alternatives for continuing, extending, modifying or eliminating contracts.

In order to achieve this while maintaining a balance between economics and security of supply, the company uses a portfolio strategy approach. This approach incorporates a menu driven selection of services which allows the company to choose only those specific services necessary to meet its requirements. This is achieved by first securing transportation capacity rights and then sources of supply are contracted to cover the firm transport rights taking into consideration differing seasonal obligations.

Operating flexibility is sustained by variations in contract stipulations to permit the system to swing on the most economical gas supplies available while maintaining the ability to supply rapidly fluctuating temperature requirements. Storage facilities are substituted wherever opportunity affords to reduce annual expense for flowing 365 day pipeline service without reducing design day and design winter season delivery capability. Direct control of all storage is paramount to permit PGW to minimize winter costs by injecting lower priced summer purchases and to cycle storage to balance daily take fluctuations to avoid overrun/balancing charges.

II. Supply Forecasting Methodology and Assumptions **Basic Assumptions (Continued)**

PGW's supply strategy incorporates maintaining full current winter day deliverability with regard to transportation capacity but to convert, where possible, to storage rather than winter flowing contracts to enhance financial and operational flexibility. A variety of longer term supply contracts are necessary to support pipeline transportation capacity because reliance upon best effort spot suppliers to fill wintertime supply requirements to meet firm customers' demands has proven to be an unreliable alternative. As a result longer-term contracts are utilized to support firm transportation capacity. To accomplish this end, the Company purchases winter supply contracts with daily deliverability equal to approximately 64% of the contractual daily transportation entitlements on its two interstate pipelines with direct connections to PGW's service territory. Additionally, these supply contracts match the contractual entitlements of the two pipelines by sourcing supply in a manner consistent with the pipeline's upstream contractual requirements. In this way, PGW not only helps ensure the security of supply by sourcing the gas from geographically diverse supply regions but this diversity also allows PGW to take advantage of the pricing basis differential inherent in these supply locations.

These contracts all contain the ability to fix the price for upcoming months as well as to allow the pricing to default to an agreed upon market index when there is no market advantage in fixing a price before the month begins. PGW uses this fixed price option in conjunction with its Gas Cost Rate (GCR) filing (GCR filing includes pricing based upon the NYMEX and Global Insight) by always attempting to buy under the GCR forecasted prices. Through the matching of the duration supply contracts to a seasonal demand, such as the winter operating season, the firm ratepayers benefit from not paying demand charges year-round.

A second component of PGW's supply portfolio or a volume equal to 32% of pipeline capacity, is purchased gas based on a first-of-the-month index pricing methodology with contracts that allow for daily change in volumetric take. This allows the Company to effectively shut-off higher priced supply replacing such supply with daily cheaper spot priced gases. Under assumed normal winter conditions, PGW utilizes certain storage fields (Eminence and Washington) in a manner similar to third party supply. Specifically, these storage contracts do not contain

II. Supply Forecasting Methodology and Assumptions **Basic Assumptions (Continued)**

transportation to the PGW city gate. Therefore, these storages must flow within PGW's contractual upstream capacity rights on TETCO and TGPL. Typical daily delivery from these fields utilizes approximately 4% of the daily TETCO and TGPL capacity rights to the Philadelphia city gates. These storage fields also act as a physical fixed price to counter winter price conditions since the WACOG usually reflects a winter/summer pricing differential. PGW's summer purchasing strategy also incorporates a portfolio approach to the purchase of system supply and storage refill. The GCR filing is again used as a yardstick in purchasing supply for both system supply and storage refill. PGW attempts to always purchase a portion of its supply needs below the projected GCR cost estimate with a portion of the portfolio purchased at default, first-of-the-month pricing. These first of the month pricing option contracts, in most instances, allow PGW to evaluate daily spot prices and provide for a turn-off of first-of-the-month index priced supply in favor of the purchase of more advantageous daily spot purchases.

Operating conditions permitting, the Company enters into the FERC approved capacity release market to offset demand charges it pays for its firm transportation and/or the incremental off-systems sales market when it is economically advantageous for the firm ratepayer. In both instances, these opportunities are sought only when firm customer needs are satisfied. Additionally, PGW's bundled storages and LNG can be utilized as a substitute for higher price gas supply based on market pricing conditions and the results of PGW's status report. Effectively, the Gas Supply Group is at all times studying the market for any economic advantage it can bring to the firm ratepayer.

III. Demand Forecasting Methodology and Assumptions **Basic Assumptions**

PGW uses a combination of four basic methods to develop demand projections. They are:

- 1) Historical Data -- data showing long-term demand trends, conservation and utilization patterns by the various classes of customers -- Residential, Commercial, Industrial and Interruptible.
- 2) Customer Survey -- Information as gathered by PGW's Marketing Department and used for annual projections by month and year.
- 3) Relative End Use -- Projections via Marketing methods of customer load sizing by appliance type, maximum input, maximum summer and winter full load hour (FLH) calculations which are used to develop yearly and monthly demand requirements.
- 4) Judgment -- Experienced opinion as applied to the evaluation of the combination of all data to develop the basic demand requirements.

Customer Demand

The total system-wide demand is a function of the projected gas demand per customer and the anticipated number of customers in each class. In determining customer demand, consideration is given to projecting current customer usage, augmented by significant gains or losses in each of 43 homogeneous groups for the period being projected. The Gas Planning Department attempts to determine for each customer class, the level of demand relating to experienced temperatures and the component of demand that is apparently not affected by changes in temperature. Within each class the most recent summer and winter usage patterns are established from historical records. Summer data provides an insight into each class of customers non-temperature sensitive load requirements or baseload which can be expressed in terms of thousands of cubic feet (Mcf) per day, per customer. Similarly, winter data after removal of the daily baseload level provides the temperature sensitive load requirements for each class of customer.

This usage primarily reflects space heating but also includes such other temperature sensitive needs as water heating attributable to colder ground water inlet temperatures and similar process variations. This overall heating requirement can be expressed in terms of the cubic feet of gas

III. Demand Forecasting Methodology and Assumptions **Basic Assumptions (Continued)**

utilized per degree of temperature change on a per customer basis for each separate customer classification.

In addition, consideration must be given to the variation of customer utilization patterns for space heating over the year, recognizing the transitional fall start-up of heaters, the deep winter period needs and the tapering off and shut-down which occurs in the spring. These usage patterns taken in conjunction with anticipated customer counts and appropriate temperature patterns form the basis of determining class and total system demands. Due to the inconsistencies of weather and weather forecasting techniques, no attempt is made to predict the specific daily temperatures of the projection period. Instead PGW has developed a normal monthly temperature pattern by analyzing statistical records of actual temperature patterns over a 30-year period. This pattern reflects 4555 degree-days annually distributed in a stylized pattern preserving the monthly range of colder to warmer daily temperatures experienced in the January to May period and warmer to colder daily temperatures in the September to December period.

The term "degree days" quantifies the number of degrees of temperature below a base level of 65 degrees Fahrenheit and is used as a tool to measure space heating requirements, i.e. on a day experiencing an average temperature of 40 degrees F, there would be 25 degree days. The annual 4555 degree days which is composed of the PGW normal monthly temperature patterns, form the basis of the calculation of the temperature sensitive component of demand. The application of the above described baseload, space heating factors and customer counts, when applied to a calendar based daily temperature pattern, produce a daily calculation of total customer requirements identified as sendout. It should be noted that there is a difference between sendout volume and sales volume. Sendout represents those volumes metered at the city gate to supply customers' requirements while sales are those volumes registered on customer meters. The variation between sendout and sales, after adjustments, is that portion which is lost and unaccounted for in the PGW distribution system.

III. Demand Forecasting Methodology and Assumptions **Basic Assumptions (Continued)**

Sales and sendout differ on a monthly basis in the degree day distribution pattern. For efficiency, meter reading and billing efforts are distributed uniformly over the available number of working days in a month and the majority of PGW customers are divided into 20 individual groups or cycles containing residential, commercial and industrial accounts within a specific geographic area. When these cycle customers are billed each month they reflect meter reading usage not for the calendar month being billed, but for the number of days and temperature pattern of degree-days experienced during their specific interval between meter readings. For example, assume the month of January contained 900 calendar degree-days. The customers in cycle 10 being billed for the month of January might have had meter readings taken on December 15 and again on January 17. Sales billed and reported in the company records for these customers would reflect the number of days and degree days between these reading dates rather than the 900 degree days of the month. Similarly, cycle 1 customers that might have had meter readings taken on December 1 and January 2 would reflect principally the month of December temperature experience, whereas, cycle 20 customers with meter readings taken possibly December 28 and January 29 would reflect principally the month of January temperature experience.

An average of the 20 cycles (Average Cycle Degree-Days) is used as the temperature pattern upon which to project the volume of sales in the forecast period. Both projections of sales and sendouts represent the full demand for that period from both firm and interruptible customers.

Methodology Used to Develop Monthly Estimates

A trial domestic factor is developed by classes of customers from sales reported for the summer months in the previous year. This average factor is then utilized in the sendout formula with the customer counts for the months of July, August and September. A comparison between what the formula calculates and the actual experienced for those three months is ascertained and the trial

III. Demand Forecasting Methodology and Assumptions **Basic Assumptions (Continued)**

domestic (baseload) factors are finalized to replicate the total sendout experienced. The finalized domestic factors (DOMs) are then utilized in conjunction with the actual sales and customer counts for the months of December, January and February to determine the average Mcf per degree day for each of the individual months for the remaining temperature sensitive load. The results are weighted by degree-days to give an average value which is utilized as a trial value for the heating factor.

The finalized domestic factor and the trial heating factor developed, as such, are then applied in the sendout calculations together with customer counts for the months of December, January and February (the peak winter heating period) to project an estimated sendout for each of these months. The projected sendout is then compared with the actual sendout experienced. Any variation between the projected and actual is adjusted to force the replication of the actual sendout experience thus resulting in the determination of a finalized heating factor.

To project the number of customers for each individual rate class, each rate class of customers are reviewed and accumulated individually. Current customers are ascertained from the number of billings data available from sales and revenue actually experienced immediately prior to the commencement of a model run. Declines are projected for anticipated losses to electric and other fuels, demolitions and transfers to other rates. Direct transfers from a non-heating to a heating account, as a result of a current customer's conversion to gas heat, moves the domestic load to the new category. Projected additional customers are developed by the Marketing Department where staff dealing with individual classes of customers and having the most direct knowledge of conditions within their sphere, project annual load additions which are translated into customer counts based upon typical customer usage for that individual customer class. The approximate month of turn-on is also developed to permit reflection of the effective portion of the load addition within the fiscal period under study. Interruptible class customers as well as other large special accounts are detailed individually incorporating expected gains and losses as direct contact and experience has indicated.

III. Demand Forecasting Methodology and Assumptions
Basic Assumptions (Continued)

The base revenue projections for both firm and interruptible customer groups are derived as the product of the projected sales volumes and the present tariff rate for each individual customer class within each group. The GCR revenue projections are derived as the product of the GCR factor and the projected sales volumes to the firm customers.

IV. Design Day and Design Hour Forecasting Methodology and Assumptions

Each year a six year estimate of Design Day and Design Hour requirements anticipated under design day and design hour operating conditions is prepared to ensure that adequate resources are under contract and to further ensure that PGW can fulfill its supply obligation for its firm customer requirements on a design day and design hour.

The projected demands for design day are developed utilizing previous winter periods data for all weekdays where the temperature average for the day is 32 degrees Fahrenheit or below. The total sendout for these days as recorded under actual conditions and is reduced to firm sendout by removal of the interruptible load. A computer generated linear regression procedure is utilized to develop a sendout model from actual daily sendouts and degree days, and the process is repeated in a quadratic regression and a cubic regression procedure. From the predicted sendouts in the regression, which are within a reasonable percent of error to the actual sendout, factors are derived to replicate the actual sendouts. The factors derived from this are used to determine the current load requirements for a 0 degrees F day and from this data, the load for a -5 degrees F hour is calculated. PGW's Marketing Department's load projections for present and future years are then applied to these requirements to develop design day and design hour present and future load requirements. This is achieved by the addition of the projected marketing load growth on an annual basis (by day) to the derived base-year design day requirements.

V. PGW Corporate Modeling System

General Description

The corporate modeling system is a tool used by PGW management to project sales, revenues and expenses, as well as to examine key planning strategies and evaluate their effects on company operations. The system provides the ability to determine the results of alternate plans and scenarios, while at the same time allowing for responses to "what if" type situations quantifying revenue and expenses. The system is totally interactive in that it combines the power of the computer with the experience of management to develop both short and long range projections based upon experienced historical data for sales and sendout volumes, raw material expenses and sale revenues. The corporate model system is composed of five separate models. Each model operates independently but requires substantial external data inputs as well as data output results from one or more of the other models in the system.

Gas Demand Model

The gas demand model is used to forecast total requirements for gas based upon current customer usage experience with adjustments for projected gains and losses. Input data includes domestic and space heating usage factors, customer counts by rate classifications, temperature patterns and results in projections of sales and sendout volumes. Detail and summary reports include average usage per customer and demands by rate classification. This data is transferred to the supply model.

Gas Supply Model

The supply model is used to dispatch the various supply sources in accordance with contract availability limitations. It develops the necessary balance between supply and demand which reflects plant fuel and storage injection requirements as well as customer demands by identifying the availability of interruptible load balancing sales. Detail and summary reports include daily and monthly load requirements, the volumes taken from each source by pipeline contract, storage balances, LNG requirements, etc. Data is transferred to both the cost model and the revenue model downstream.

V. PGW Corporate Modeling System (Continued)

Gas Cost Model

The gas cost model is used to determine natural gas and other raw material costs dispatched. The model tracks the various cost components of each contract - the demand, capacity, commodity, injection and withdrawal charges - providing monthly and annual details and summary information including inventory valuations and expenses for supplemental LNG supplies. It transfers these expenses to the Gas Cost Rate Model.

Gas Cost Rate Model

The gas cost rate model is used to develop the net natural gas expenses, net applicable GCR expenses and the GCR. It ascribes responsibility for the raw material costs to firm and interruptible classes in accordance with PGW's tariff requirements, assigning cost on an as-used basis to customer classes applicable to such charges, and compensates for natural gas refunds and previous over or under billing of fuel expenses. Detail summary reports include specifics of raw material adjustment, statements of reconciliation, and determination of applicable sales and expenses. It transfers the results to the revenue model.

Revenue Model

The revenue model is used to project billed revenue by rate classification in accordance with PGW's rate tariffs. It prepares the net billed revenue, GCR revenues, senior citizen discounts, and cycle billing information all detailed by rate classification. The detail and summary reports provided by this model are directed to the accounting and financial departments for inclusion in various financial reviews.

Summary

The corporate modeling system allows PGW management to effectively address supply/demand balancing, supply facilities planning, projected sales, cost, revenues, and sendout volumes in a timely manner. Results assist in the development of PGW's annual Operating Budget, setting of the GCR and planning of supply resources.

V. PGW Corporate Modeling System (Continued)

The model also provides a Status Report for the evaluation of remaining winter period requirements on both normal and design temperature patterns and the extrapolation of the current year based upon the experience to date and an assumption of temperatures anticipated for the remaining period of the year. this latter acting as a guide for both financial cash flow planning and winter operations.

**FORM-IRP-GAS-1A: ANNUAL GAS REQUIREMENTS
REPORTING UTILITY: PHILADELPHIA GAS WORKS
(VOLUMES IN MMcf)**

Index Year Actual Year	Historical Data		Current Year	Three Year Forecast		
	-2 2003-2004	-1 2004-2005	0 2005-2006	1 2006-2007	2 2007-2008	3 2008-2009
Firm Requirements:						
Retail Residential	42,433	41,467	38,733	43,869	43,828	43,641
Retail Commercial	12,166	11,919	11,580	12,890	13,027	13,150
Retail Industrial	1,119	1,050	1,023	1,517	1,674	1,830
Electric Power Generation	-	-	-	-	-	-
Exchanges with Other Utilities	-	-	-	-	-	-
Unaccounted For Gas	2,540	1,902	1,625	2,432	2,443	2,447
Company Use	99	95	98	104	104	104
Other - Prior Period Adjustment	-	(463)	-	-	-	-
Subtotal Firm	58,356	55,970	53,060	60,811	61,077	61,171
Interruptible Requirements:						
Retail	4,006	4,464	2,783	3,134	3,124	3,149
Electric Power Generation	98	47	20	7	10	13
Company's Own Plant	61	65	67	71	71	70.65
Unaccounted For Gas	183	185	98	126	125	127
Subtotal Interruptible	4,347	4,760	2,968	3,338	3,330	3,360
SUBTOTAL FIRM AND INTERRUPTIBLE	62,703	60,730	56,028	64,150	64,406	64,532
Transportation:						
Firm Residential	-	-	-	-	-	-
Firm Commercial	-	-	-	-	-	-
Firm Industrial	-	-	-	-	-	-
Interruptible Residential	-	-	-	-	-	-
Interruptible Commercial	302	1,508	1,952	2,851	2,821	2,931
Interruptible Industrial	918	1,912	2,226	3,021	3,068	3,086
Other - Non-Utility Power Producers	7,762	8,307	7,442	8,340	8,340	8,340
Subtotal Transportation	8,981	11,727	11,620	14,212	14,229	14,356
TOTAL GAS REQUIREMENTS	71,684	72,457	67,649	78,362	78,636	78,888
Increase (Decrease)	na	772	(4,808)	10,713	274	252
Percent Change (%)	na	1.08%	-6.64%	15.84%	0.35%	0.32%

FORM-IRP-GAS-1B:PEAK DAY REQUIREMENTS
REPORTING UTILITY: PHILADELPHIA GAS WORKS
(VOLUMES IN MMcf)

Index Year Actual Year	Historical Data		Current Year ⁽²⁾	Three Year Forecast ⁽¹⁾		
	-2 2003-2004	-1 2004-2005	0 2005-2006	1 2006-2007	2 2007-2008	3 2008-2009
Firm Requirements:						
Retail Residential	438	405	489	538	536	535
Retail Commercial	125	116	128	141	142	144
Retail Industrial	12	10	11	16	17	19
Electric Power Generation	0	0	0	0	0	0
Exchanges with Other Utilities	0	0	0	0	0	0
Unaccounted For Gas	26	19	0	0	0	0
Company Use	1	1	1	1	1	1
Other	0	0	0	0	0	0
Subtotal Firm	602	552	630	695	697	698.4
Interruptible Requirements:						
Retail	18.1	28.2	26.5	25.1	25.3	25.7
Electric Power Generation	0.0	0.1	0.0	0.0	0.0	0.0
Company's Own Plant	0.4	0.6	0.6	0.0	0.0	0.0
Unaccounted For Gas	0.0	0.0	0.0	1.0	1.0	1.0
Subtotal Interruptible	18.5	28.9	27.1	26.1	26.2	26.7
SUBTOTAL FIRM AND INTERRUPTIBLE						
	620	580	657	721	723	725
Transportation:						
Firm Residential	0	0	0	0	0	0
Firm Commercial	0	0	0	0	0	0
Firm Industrial	0	0	0	0	0	0
Interruptible Residential	0	0	0	0	0	0
Interruptible Commercial	0	6	0	0	0	0
Interruptible Industrial	2	5	0	0	0	0
Other - Non-Utility Power Producers	2	35	0	0	0	0
Subtotal Transportation	4	46	0	0	0	0
TOTAL GAS REQUIREMENTS						
	624	627	657	721	723	725
Increase (Decrease)	na	3	30	64	2	2
Percent Change (%)	na	0.49%	4.82%	9.78%	0.24%	0.27%

⁽¹⁾ Peak Day is forecasted at a 2 degree temperature.

⁽²⁾ Current Year Peak Day is forecasted at a 5 degree temperature.

FORM-IRP-GAS-2A: ANNUAL/PEAK SUPPLY
TABLE 1: ANNUAL/PEAK SUPPLY
REPORTING UTILITY: PHILADELPHIA GAS WORKS
(Volumes in MMcf)

Index Year Actual Year	Historical Data				Current Year ⁽²⁾		Three Year Forecast ⁽¹⁾					
	-2 2003-2004		-1 2004-2005		0 2005-2006		1 2006-2007		2 2007-2008		3 2008-2009	
	Annual	Peak	Annual	Peak	Annual	Peak	Annual	Peak	Annual	Peak	Annual	Peak
Gas Supply for Sales Service												
TETCO	-	-	-	-	-	-	-	-	-	-	-	-
TRANSCO	9,841	53	4,557	53	-	-	-	-	-	-	-	-
Spot Purchases	57,160	295	59,837	235	58,813	249	65,826	259	67,082	255	64,684	253
Storage Withdrawals	14,082	86	11,116	160	16,071	167	16,970	167	14,188	205	14,490	206
LNG Withdrawal	2,609	188	1,817	135	1,541	245	2,067	301	1,822	270	1,656	272
Company Production	-	-	-	-	-	-	-	-	-	-	-	-
LNG Purchases	-	-	382	-	-	-	-	-	-	-	-	-
Exchanges with other LDCs	-	-	-	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-	-	-	-
Total Gas Supply	83,692	622	77,709	583.1	76,426	661	84,863	727	83,092	730	80,830	732
Total Transportation Services	8,981	4	11,727	46	11,620	-	14,212	-	14,229	-	14,356	-
TOTAL GAS SUPPLY AND TRANSPORTATION SERVICE	92,673	625	89,436	630	88,046	661	99,075	727	97,321	730	95,186	732
Deductions												
Underground Storage Injections & Fuels	18,290	-	13,939	-	18,076	4	17,765	4	16,818	4	14,579	4
LNG Liquefactions & Fuels	2,699	1	2,571	3	2,321	0	2,949	2	1,867	2	1,719	2
Sales to other LDC's	-	-	470	-	-	-	-	-	-	-	-	-
Total Deductions	20,989	1	16,979	3	20,397	4	20,713	6	18,685	6	16,298	7
NET GAS SUPPLY	71,684	624	72,457	627	67,649	657	78,362	721	78,636	723	78,888	725
BTU	1,038											

⁽¹⁾ Peak Day is forecasted at a 2 degree temperature.

⁽²⁾ Current Year Peak Day is forecasted at a 5 degree temperature.

**FORM-IRP-GAS-2B: NATURAL GAS TRANSPORTATION
REPORTING UTILITY: PHILADELPHIA GAS WORKS
(volumes in MMcf)**

Index Year Actual year	Historical Data				Current Year		Three Year Forecast					
	-2 2003-2004		-1 2004-2005		0 2005-2006		1 2006-2007		2 2007-2008		3 2008-2009	
	Annual	Peak	Annual	Peak	Annual	Peak	Annual	Peak	Annual	Peak	Annual	Peak
City Gate Transportation Contracts:												
Transcontinental Transmission Corp.	3,723	60	3,723	60	3,723	60	3,723	60	3,723	60	3,723	60
Texas Eastern Transmission Corp.	2,570	43	2,570	43	2,570	43	2,570	43	2,570	43	2,570	43
Texas Eastern Transmission Corp.	2,390	20	2,390	20	2,390	20	2,390	20	2,390	20	2,390	20
Transcontinental Transmission Corp.	453	5	453	5	453	5	453	5	453	5	453	5
Total	9,137	128	9,137	128	9,137	128	9,137	128	9,137	128	9,137	128
Upstream Transportation Contracts:												
Transcontinental Transmission Corp.	58,546	160	58,546	160	58,546	160	58,546	160	58,546	160	58,546	160
Texas Eastern Transmission Corp.	26,578	73	26,578	73	26,578	73	26,578	73	26,578	73	26,578	73
Texas Eastern Transmission Corp.	8,442	23	8,442	23	8,442	23	8,442	23	8,442	23	8,442	23
Texas Eastern Transmission Corp.	2,359	17	2,359	17	2,359	17	2,359	17	2,359	17	2,359	17
Texas Eastern Transmission Corp.	2,359	17	2,359	17	2,359	17	2,359	17	2,359	17	2,359	17
Transcontinental Transmission Corp.	172	2	172	2	172	2	172	2	172	2	172	2
Total	98,456	293	98,456	293	98,456	293	98,456	293	98,456	293	98,456	293
Storage-Related Transportation Contracts:												
Dominion Transmission Inc.	9,110	25	9,110	25	9,110	25	9,110	25	9,110	25	9,110	25
Dominion Transmission Inc.	2,760	8	2,760	8	2,760	8	2,760	8	2,760	8	2,760	8
Equitrans	1,911	5	1,911	5	1,911	5	1,911	5	1,911	5	1,911	5
Total	13,782	38	13,782	38	13,782	38	13,782	38	13,782	38	13,782	38

FORM-IRP-GAS-2C: NATURAL GAS STORAGE ⁽¹⁾
REPORTING UTILITY: PHILADELPHIA GAS WORKS
(volumes in MMcf)

Index Year Actual year	Historical Data				Current Year		Three Year Forecast					
	-2 2004		-1 2005		0 2006		1 2007		2 2008		3 2009	
	Annual	Peak	Annual	Peak	Annual	Peak	Annual	Peak	Annual	Peak	Annual	Peak
Transcontinental Transmission Corp.	3,723	60	3,723	60	3,723	60	3,723	60	3,723	60	3,723	60
Dominion Transmission Inc.	3,481	32	3,481	32	3,481	32	3,481	32	3,481	32	3,481	32
Transcontinental Transmission Corp.	3,086	36	3,086	36	3,086	36	3,086	36	3,086	36	3,086	36
Texas Eastern Transmission Corp.	2,467	43	2,467	43	2,467	43	2,467	43	2,467	43	2,467	43
Texas Eastern Transmission Corp.	2,219	20	2,219	20	2,219	20	2,219	20	2,219	20	2,219	20
Transcontinental Transmission Corp. ⁽³⁾	802	80	802	80	1,106	110	1,106	110	1,106	110	1,106	110
Equitrans	507	5	507	5	507	5	507	5	507	5	507	5
Transcontinental Transmission Corp.	453	5	453	5	453	5	453	5	453	5	453	5
Total	16,738	281	16,738	281	17,042	311	17,042	311	17,042	311	17,042	311

⁽¹⁾ Rank contracts in order of magnitude for the current year, noting the transportation provided and termination date for each contract reported. Reporting should proceed along rank ordering until 75% of total is accounted for, or until ten contracts have been listed, whichever occurs first.

Conversions at 1030 Btu

	Contract Expiration Date ⁽²⁾
Transcontinental Transmission Corp.	03/31/2013
Dominion Transmission Inc.	03/31/2006
Transcontinental Transmission Corp.	Evergreen
Texas Eastern Transmission Corp.	04/30/2012
Texas Eastern Transmission Corp.	04/30/2012
Transcontinental Transmission Corp.	10/31/2013
Equitrans	03/31/2006
Transcontinental Transmission Corp.	04/15/2006

⁽²⁾ For purposes of this report, all contracts due to expire are assumed renewed for the forecast years.

⁽³⁾ Storage withdrawal increase in 2006 is due to the termination of the Firm Service (FS) Contract.

Philadelphia Gas Works

Pennsylvania Public Utility Commission

52 Pa. Code §53.61, et seq.

Item 53.64(c) Thirty days prior to the filing, of a tariff reflecting an increase or decrease in natural gas costs, each Section 1307(f) as utility seeking recovery of purchased as costs under that section shall provide notice to the public, under § 53.68 (relating to notice requirements), and shall file the following supporting information with the Commission, with a copy to the Consumer Advocate, Small Business Advocate and to intervenors upon request:

53.64(c)(6) Each Section 1307 (f) utility shall file with the Commission a statement of its current fuel procurement practices, detailed information concerning, the staffing and expertise of its fuel procurement personnel, a discussion of its methodology for obtaining a least cost and reliable source of as supply, including a discussion of any methodologies, assumptions, models or rules of thumb employed in selecting its gas supply, transportation and storage mix, its loss prevention strategy in the event of fraud, nonperformance or interruption of performance, its participation in capacity release and reallocation programs, the impact, if any, upon least cost fuel procurement by constraints imposed by local transportation end users, interruptible service, balancing, storage and dispatching, options, and its strategy for improving its fuel procurement practices in the future and timetable for implementing these changes.

Response:

I. Current Strategy

PGW's current strategy for meeting the system's supply requirements is to use a portfolio approach in both contract structures and pricing. The Company's supply portfolio is split into three distinct categories. First, the Company enters into winter-only supply contracts. These winter-only supply arrangements provide gas supply that fills approximately sixty-two percent (62%) of PGW's daily firm transportation entitlements on both Duke Energy Gas Transmission and Williams Gas Pipeline.

Item 53.64(c)(6) continued

The Duke Energy and Williams pipelines represent the only interstate pipeline facilities with physical connections to the PGW service territory. These supply contracts also recognize pipeline receipt and delivery rights. By sourcing supply in this manner, PGW not only ensures security of supply from the pipelines, but also can take advantage of varying basis differentiated pricing in the market. These contracts all contain the ability to set the price for upcoming months, or to have the pricing default to an agreed upon market index. Second, an additional twenty-eight percent (28 %) of PGW's gas supply portfolio is purchased on "first of the month index" priced contracts that allow for daily changes in volume. The operational flexibility of these contracts allows the company to increase or decrease gas supply to meet variations in sendout requirements at a known price. Third the company utilizes three (3) pipeline storage services, as an additional source of supply. These storage services do not contain bundled transportation and therefore are moved to the city gates within PGW's firm interstate pipeline capacity. These services represent 10 percent (10 %) of supply at a fixed price. The variation in the percentages this year is due to two one-year capacity releases totally forty-three thousand dekatherms, which the company was able to release due to a loss in load. These capacity releases are with twenty-four hour recall rights in their terms and conditions. They are split between the two interstate pipelines which service PGW. If the need would arise to recall this capacity PGW would do so and use its unbundled storage to fill the TGPL portion (twenty thousand dekatherms) and depend on market based prices to fill the TETCO portion (twenty three thousand dekatherms).

Additionally, PGW utilizes bundled storage and LNG to meet operational requirements and to accomplish other cost saving initiatives. Specifically, once design winter sendout requirements are ensured of being met, the company may utilize bundled storage and LNG inventories to displace higher priced supply based on then current market conditions. PGW's also uses a portfolio approach to address system supply and storage refill in the traditional non-peak season. The Gas Supply area uses the GCR filing as a template in an attempt to purchase gas volumes for both system supply and storage refill below the projected cost, when possible. However, some proportion of the supply will always be subject to spot market pricing either daily or monthly due to the constant need to purchase gas to meet sendout variations that are inherent in a residential firm heating load. PGW seeks to recoup demand charges for its firm transportation through the FERC approved capacity release mechanisms.

The Company also enters into the incremental off systems sales market to generate additional revenue when it is economically advantageous to do so. At all times the Company is studying the market for any, economic advantage that can be derived in support of the firm ratepayer.

Item 53.64(c)(6) continued

II. Overview of Gas Supply Section

The Gas Supply Section of Gas Management is comprised of four departments: Gas Supply, Gas Transportation, Gas Accounting and Gas Control. The Gas Supply Section is responsible for ensuring that there is an adequate supply of natural gas available at all times to meet the requirements of PGW's over 470,000 firm customers. The Gas Supply Section accomplishes this through continuous interaction with various departments within PGW.

The staff of the Gas Supply Section is expected to maintain an in-depth working knowledge of all facets of the natural gas supply markets. The staff members of the four departments are required to maintain a working knowledge of PGW's natural gas contracts and facilities for the purpose of ensuring the safe and efficient operation of the distribution system, in accordance with company procedures, and in compliance with federal, state, and local regulations.

III. Organization and Staffing

Director of Gas Transportation and Gas Control: This person has a fifteen-year history in the supply area and a four-year history in gas control. This individual has a BA as well as having a background in natural gas accounting, allocation and confirmation experience under the first stages of FERC Order 636, and its effect on supply portfolio management.

This individual and the staffs of the departments that report to him interacts continuously and provides 24/7 coverage in all situations pertaining to the gas supply portfolio and operation of the natural gas facilities. This is done in conjunction with the Gas Supply Committee as well as everyday meetings with the VP of Gas Management and the other direct reports of the VP of Gas Management. The following departments report directly to this individual Gas Supply, Gas Control, Gas Accounting, and Gas Transportation.

Manager, Gas Supply this person has over ten years experience in the gas supply area. This individual has a MBA and BS in addition to having an extensive background in the area of gas accounting and gas purchasing. Reporting to this individual is the gas accountants, and gas coordinators.

Manager, Gas Control: This person has over ten years in the supply area, is responsible for the day-today management of the city distribution grid as well as daily confirmation of each day's gas volumes. He supervises the gas control department on a 24/7 basis. The manager has a BS degree and extends duty in the Distribution Department's network analysis area.

Philadelphia Gas Works

Pennsylvania Public Utility Commission
52 Pa. Code §53.61, et seq.

Item 53.64(c) Thirty days prior to the filing of a tariff reflecting an increase or decrease in natural gas costs, each Section 1307(f) gas utility seeking recovery of purchased gas costs under that section shall provide notice to the public, under § 53.68 (relating to notice requirements), and shall file the following supporting information with the Commission, with a copy to the Consumer Advocate, Small Business Advocate and to intervenors upon request:

- (7) A list of off-system sales, including transportation, storage, or capacity releases by the utility at less than the weighted average price of gas, or at less than the original contract cost of transportation, storage, or capacity supplied to the utility for its own customers.

Response:

The attached schedules list off system sales and capacity release for the period of January 1, 2006 to December 31, 2006.

Schedule 1 – reflects all off system sales margins for the period January 1, 2006 to December 31, 2006.

Schedule 2 – would reflect any off system sales transactions, which were done at less than the weighted average cost of gas. The schedule is blank because none of the deals match the criteria.

Schedule 3 – illustrates all capacity release deals.

Schedule 4 - would reflect any individual capacity release transactions, which were done at less than the weighted average cost of capacity.

Philadelphia Gas Works
Pennsylvania Public Utilities Commission
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Schedule 1
Item 53.64(C)(7)

Off-System Sales			
MONTH	Total Revenue	Ratepayer Margin	Total Credit To GCR
Jan-06	\$0	\$0	\$0
Feb-06	\$0	\$0	\$0
Mar-06	\$0	\$0	\$0
Apr-06	\$0	\$0	\$0
May-06	\$0	\$0	\$0
Jun-06	\$0	\$0	\$0
Jul-06	\$0	\$0	\$0
Aug-06	\$297,750	\$68,809	\$297,750
Sep-06	\$0	\$0	\$0
Oct-06	\$147,964	\$38,642	\$147,964
Nov-06	\$0	\$0	\$0
Dec-06	\$0	\$0	\$0
Total	\$445,714	\$107,451	\$445,714

**Philadelphia Gas Works
Pennsylvania Public Utilities Commission
52 Pa. Code §53.61, et seq.**

**Schedule 2
Item 53.64(C)(7)**

Off System Sale Profits Per WACOG Worksheet

No deals were enacted under the weighted average cost of gas.

Philadelphia Gas Works
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 52 Pa. Code §53.61, et seq.

Schedule 3
 Item 53.64(C)(7)

MONTH	Capacity Release		
	Total	Total	Total
	TGPL	TETCO	GCR
	Credits	Credits	Credits
Jan-06	\$278,297	\$354,438	\$ 632,735
Feb-06	\$247,378	\$320,138	\$ 567,516
Mar-06	\$265,511	\$354,438	\$ 619,949
Apr-06	\$259,950	\$367,305	\$ 627,255
May-06	\$345,365	\$675,202	\$1,020,567
Jun-06	\$397,106	\$648,921	\$1,046,027
Jul-06	\$510,540	\$589,351	\$1,099,891
Aug-06	\$568,465	\$410,035	\$ 978,500
Sep-06	\$580,371	\$602,533	\$1,182,904
Oct-06	\$285,228	\$674,320	\$ 959,548
Nov-06	\$531,927	\$381,843	\$ 913,770
Dec-06	\$746,080	\$402,346	\$1,148,426
Total	\$5,016,218	\$5,780,870	\$10,797,089

Philadelphia Gas Works
Pennsylvania Public Utilities Commission
52 Pa. Code §53.61, et seq.

M / YR	PIPELINE	PATH	RECALL STATUS	MONTHLY VOLUME DTH	TOTAL MONTHLY CREDIT	CREDIT DTH	TOTAL GCR CREDIT	REPLACEMENT SHIPPER
January-06	TETCO	SIX - M3	N	738,482	\$ 354,438.00	\$ 0.4800	\$ 354,438.00	BG LNG
	TRANSCO	3-6	N	310,000	\$ 101,215.00	\$ 0.3265	\$ 101,215.00	Stat Oil
	TRANSCO	3-6	N	310,000	\$ 130,200.00	\$ 0.4200	\$ 130,200.00	BG LNG
	TRANSCO	3-6	N	30,000	\$ 12,786.00	\$ 0.4262	\$ 12,786.00	Williams
	TRANSCO	3-6	N	20,000	\$ 8,524.00	\$ 0.4262	\$ 8,524.00	Williams
TRANSCO	3-6	N	60,000	\$ 25,572.00	\$ 0.4262	\$ 25,572.00	Williams	
February-06	TETCO	SIX - M3	N	667,016	\$320,137.93	\$ 0.4800	\$ 320,137.93	BG LNG
	TRANSCO	3-6	N	280,000	\$91,420.00	\$ 0.3265	\$ 91,420.00	Stat Oil
	TRANSCO	3-6	N	280,000	\$117,600.00	\$ 0.4200	\$ 117,600.00	BG LNG
	TRANSCO	3-6	N	90,000	\$38,358.00	\$ 0.4262	\$ 38,358.00	Williams
March-06	TETCO	SIX - M3	N	738,482	\$ 354,438.00	\$ 0.4800	\$ 354,438.00	BG LNG
	TRANSCO	3-6	N	310,000	\$ 101,215.00	\$ 0.3265	\$ 101,215.00	Stat Oil
	TRANSCO	3-6	N	310,000	\$ 130,200.00	\$ 0.4200	\$ 130,200.00	BG LNG
	TRANSCO	3-6	N	70,000	\$ 29,834.00	\$ 0.4262	\$ 29,834.00	Williams
	TRANSCO	3-6	N	10,000	\$ 4,262.00	\$ 0.4262	\$ 4,262.00	Constellation

M / YR	PIPELINE	PATH	RECALL STATUS	MONTHLY VOLUME DTH	TOTAL MONTHLY CREDIT	CREDIT DTH	TOTAL GCR CREDIT	REPLACEMENT SHIPPER
April-06	TETCO	SIX - M3	N	540,000	\$ 13,500.00	\$ 0.0250	\$ 13,500.00	Colonial Energy
	TETCO	SIX - M3	N	540,000	\$ 10,800.00	\$ 0.0200	\$ 10,800.00	MacQuarie-Cook
	TETCO	SIX - M3	N	714,660	\$ 343,004.91	\$ 0.4800	\$ 343,004.91	BCG LNG
	TRANSCO	3-6	N	300,000	\$97,950.00	\$ 0.3265	\$ 97,950.00	Stat Oil
	TRANSCO	3-6	N	300,000	\$126,000.00	\$ 0.4200	\$ 126,000.00	BCG LNG
	TRANSCO	3-6	N	300,000	\$36,000.00	\$ 0.1200	\$ 36,000.00	VA Power
May-06	TETCO	W1A - M-3	N	558,000	\$308,363.48	\$ 0.5526	\$ 308,363.48	Grays Ferry
	TETCO	W1A - M-3	N	558,000	\$ -	\$ -	\$ -	Grays Ferry
	TETCO	SIX - M3	N	155,000	\$7,750.00	\$ 0.0500	\$ 7,750.00	Constellation
	TETCO	SIX - M3	N	155,000	\$4,650.00	\$ 0.0300	\$ 4,650.00	MacQuarie-Cook
	TETCO	SIX - M3	N	738,482	\$354,438.40	\$ 0.4800	\$ 354,438.40	BCG LNG
	TRANSCO	3-6	N	25,000	\$4,000.00	\$ 0.1600	\$ 4,000.00	Williams
	TRANSCO	3-6	N	25,000	\$2,000.00	\$ 0.0800	\$ 2,000.00	Williams
	TRANSCO	3-6	N	25,000	\$2,500.00	\$ 0.1000	\$ 2,500.00	VA Power
	TRANSCO	3-6	N	310,000	\$101,215.00	\$ 0.3265	\$ 101,215.00	Stat Oil
	TRANSCO	3-6	N	310,000	\$130,200.00	\$ 0.4200	\$ 130,200.00	BN LNG
	TRANSCO	3-6	N	310,000	\$37,200.00	\$ 0.1200	\$ 37,200.00	VA Power
	TRANSCO	3-6	N	35,000	\$5,950.00	\$ 0.1700	\$ 5,950.00	Merrill Lynch
	TRANSCO	3-6	N	35,000	\$3,150.00	\$ 0.0900	\$ 3,150.00	Williams
	TRANSCO	3-6	N	35,000	\$5,250.00	\$ 0.1500	\$ 5,250.00	Williams
	TRANSCO	3-6	N	35,000	\$2,800.00	\$ 0.0800	\$ 2,800.00	Williams
	TRANSCO	3-6	N	35,000	\$2,800.00	\$ 0.0800	\$ 2,800.00	Merrill Lynch
	TRANSCO	3-6	N	105,000	\$5,250.00	\$ 0.0500	\$ 5,250.00	Merrill Lynch
	TRANSCO	3-6	N	35,000	\$3,850.00	\$ 0.1100	\$ 3,850.00	Williams
	TRANSCO	3-6	N	70,000	\$5,600.00	\$ 0.0800	\$ 5,600.00	Merrill Lynch
	TRANSCO	3-6	N	70,000	\$2,100.00	\$ 0.0300	\$ 2,100.00	MacQuarie-Cook
TRANSCO	3-6	N	25,000	\$2,500.00	\$ 0.1000	\$ 2,500.00	Williams	
TRANSCO	3-6	N	50,000	\$4,000.00	\$ 0.0800	\$ 4,000.00	Merrill Lynch	
TRANSCO	3-6	N	50,000	\$25,000.00	\$ 0.5000	\$ 25,000.00	Sequent	

M / YR	PIPELINE	PATH	RECALL STATUS	MONTHLY VOLUME DTH	TOTAL MONTHLY CREDIT	CREDIT DTH	TOTAL GCR CREDIT	REPLACEMENT SHIPPER
June - 06	TETCO	WJA - M-3	N	540,000	\$ 298,416.00	\$ 0.5526	\$ 298,416.00	Grays Ferry
	TETCO	WJA - M-3	N	540,000		\$ -	\$ -	Grays Ferry
	TETCO	SIX - M3	N	150,000	\$7,500.00	\$ 0.0500	\$ 7,500.00	Constellation
	TETCO	SIX - M3	N	714,660	\$343,005.00	\$ 0.4800	\$ 343,005.00	BG LNG
	TRANSCO	3-6	N	20,000	\$ 1,000.00	\$ 0.0500	\$ 1,000.00	Sequent
	TRANSCO	3-6	N	70,000	\$ 4,900.00	\$ 0.0700	\$ 4,900.00	Sequent
	TRANSCO	3-6	N	70,000	\$ 4,900.00	\$ 0.0700	\$ 4,900.00	Sequent
	TRANSCO	3-6	N	40,000	\$ 800.00	\$ 0.0200	\$ 800.00	Sequent
	TRANSCO	3-6	N	140,000	\$ 9,800.00	\$ 0.0700	\$ 9,800.00	Sequent
	TRANSCO	3-6	N	300,000	\$ 60,000.00	\$ 0.2000	\$ 60,000.00	Sequent
	TRANSCO	3-6	N	140,000	\$ 2,800.00	\$ 0.0200	\$ 2,800.00	Sequent
	TRANSCO	3-6	N	10,000	\$ 1,000.00	\$ 0.1000	\$ 1,000.00	Williams
	TRANSCO	3-6	N	35,000	\$ 4,550.00	\$ 0.1300	\$ 4,550.00	Williams
	TRANSCO	3-6	N	35,000	\$ 3,850.00	\$ 0.1100	\$ 3,850.00	Williams
	TRANSCO	3-6	N	20,000	\$ 1,600.00	\$ 0.0800	\$ 1,600.00	Merrill Lynch
	TRANSCO	3-6	N	70,000	\$ 7,056.00	\$ 0.1008	\$ 7,056.00	Merrill Lynch
	TRANSCO	3-6	N	70,000	\$ 7,000.00	\$ 0.1000	\$ 7,000.00	Merrill Lynch
	TRANSCO	3-6	N	70,000	\$ 9,450.00	\$ 0.1350	\$ 9,450.00	Merrill Lynch
	TRANSCO	3-6	N	140,000	\$ 14,000.00	\$ 0.1000	\$ 14,000.00	Merrill Lynch
	TRANSCO	3-6	N	300,000	\$ 97,950.00	\$ 0.3265	\$ 97,950.00	Stat Oil
TRANSCO	3-6	N	300,000	\$ 52,500.00	\$ 0.1750	\$ 52,500.00	Stat Oil	
TRANSCO	3-6	N	300,000	\$ 126,000.00	\$ 0.4200	\$ 126,000.00	BG LNG	
TRANSCO	3-6	N	300,000	\$ 36,000.00	\$ 0.1200	\$ 36,000.00	VA Power	
TRANSCO	3-6	N	75,000	\$ 5,250.00	\$ 0.0700	\$ 5,250.00	United Energy	
TRANSCO	3-6	N	35,000	\$ 700.00	\$ 0.0200	\$ 700.00	Rainbow Energy	

M / YR	PIPELINE	PATH	RECALL STATUS	MONTHLY VOLUME DTH	TOTAL MONTHLY CREDIT	CREDIT DTH	TOTAL GCR CREDIT	REPLACEMENT SHIPPER
July-06	TETCO	WLA - M-3	N	558,000	\$ 221,580.38	\$ 0.3971	\$ 221,580.38	Grays Ferry
	TETCO	WLA - M-3	N	558,000	\$ -	\$ -	\$ -	Grays Ferry
	TETCO	SIX - M3	N	155,000	\$ 7,750.00	\$ 0.0500	\$ 7,750.00	Constellation
	TETCO	SIX - M3	N	155,000	\$ 7,750.00	\$ 0.0500	\$ 5,550.00	Constellation
	TETCO	SIX - M3	N	738,482	\$ 354,471.00	\$ 0.4800	\$ 354,471.00	BGI LNG
	TRANSCO	3-6	N	50,000	\$ 5,500.00	\$ 0.1100	\$ 5,500.00	Merrill Lynch
	TRANSCO	3-6	N	80,000	\$ 8,800.00	\$ 0.1100	\$ 8,800.00	Merrill Lynch
	TRANSCO	3-6	N	35,000	\$ 6,300.00	\$ 0.1800	\$ 6,300.00	MacQuaire Cook
	TRANSCO	3-6	N	70,000	\$ 7,700.00	\$ 0.1100	\$ 7,700.00	MacQuaire Cook
	TRANSCO	3-6	N	35,000	\$ 7,000.00	\$ 0.2000	\$ 7,000.00	MacQuaire Cook
	TRANSCO	3-6	N	70,000	\$ 8,050.00	\$ 0.1150	\$ 8,050.00	MacQuaire Cook
	TRANSCO	3-6	N	170,000	\$ 19,550.00	\$ 0.1150	\$ 19,550.00	MacQuaire Cook
	TRANSCO	3-6	N	310,000	\$ 24,800.00	\$ 0.0800	\$ 24,800.00	Conoco Phillip
	TRANSCO	3-6	N	77,500	\$ 3,875.00	\$ 0.0500	\$ 3,875.00	Rainbow Energy
	TRANSCO	3-6	N	310,000	\$ 101,215.00	\$ 0.3265	\$ 101,215.00	Stat Oil
	TRANSCO	3-6	N	310,000	\$ 54,250.00	\$ 0.1750	\$ 54,250.00	Stat Oil
	TRANSCO	3-6	N	310,000	\$ 40,300.00	\$ 0.1300	\$ 40,300.00	Stat Oil
	TRANSCO	3-6	N	310,000	\$ 130,200.00	\$ 0.4200	\$ 130,200.00	BGI LNG
	TRANSCO	3-6	N	310,000	\$ 37,200.00	\$ 0.1200	\$ 37,200.00	VA Power
	TRANSCO	3-6	N	310,000	\$ 24,800.00	\$ 0.0800	\$ 24,800.00	Sequent
	TRANSCO	3-6	N	310,000	\$ 31,000.00	\$ 0.1000	\$ 31,000.00	Sequent

M / YR	PIPELINE	PATH	RECALL STATUS	MONTHLY VOLUME DTH	TOTAL MONTHLY CREDIT	CREDIT DTH	TOTAL GCR CREDIT	REPLACEMENT SHIPPER	
August -06	TETCO	WLA - M-3	N	472,967	\$14,508.00	\$ 0.0307	\$ 14,508.00	Grays Ferry	
	TETCO	WLA - M-3	N	472,967	\$11,606.00	\$ 0.0245	\$ 11,606.00	Grays Ferry	
	TETCO	SIX - M3	N	155,000	\$7,750.00	\$ 0.0500	\$ 7,750.00	Constellation	
	TETCO	SIX - M3	N	310,000	\$21,700.00	\$ 0.0700	\$ 21,700.00	Constellation	
	TETCO	SIX - M3	N	738,482	\$354,471.00	\$ 0.4800	\$ 354,471.00	BG LNG	
	TRANSCO	3-6	N	310,000	\$ 65,100.00	\$ 0.2100	\$ 65,100.00	Conoco Phillips	
	TRANSCO	3-6	N	310,000	\$ 12,400.00	\$ 0.0400	\$ 12,400.00	Conoco Phillips	
	TRANSCO	3-6	N	310,000	\$ 24,800.00	\$ 0.0800	\$ 24,800.00	Sequent	
	TRANSCO	3-6	N	310,000	\$ 31,000.00	\$ 0.1000	\$ 31,000.00	Sequent	
	TRANSCO	3-6	N	310,000	\$ 101,215.00	\$ 0.3265	\$ 101,215.00	Stat Oil	
	TRANSCO	3-6	N	310,000	\$ 54,250.00	\$ 0.1750	\$ 54,250.00	Stat Oil	
	TRANSCO	3-6	N	310,000	\$ 40,300.00	\$ 0.1300	\$ 40,300.00	Stat Oil	
	TRANSCO	3-6	N	310,000	\$ 130,200.00	\$ 0.4200	\$ 130,200.00	BG LNG	
	TRANSCO	3-6	N	310,000	\$ 37,200.00	\$ 0.1200	\$ 37,200.00	VA Power	
	TRANSCO	3-6	N	80,000	\$ 24,000.00	\$ 0.3000	\$ 24,000.00	Williams	
	TRANSCO	3-6	N	160,000	\$ 48,000.00	\$ 0.3000	\$ 48,000.00	Williams	
	September -06	TETCO	SIX - M3	N	30	\$ 4.68	\$ 0.1560	\$ 4.68	UGI
		TETCO	SIX - M3	N	178,146	\$ 10,688.76	\$ 0.0600	\$ 10,688.76	BG LNG System
		TETCO	WLA - M-3	N	457,710	\$ 106,514.32	\$ 0.2327	\$ 106,514.32	Grays Ferry
TETCO		WLA - M-3	N	457,710	\$ 106,514.32	\$ 0.2327	\$ 106,514.32	Grays Ferry	
TETCO		SIX - M3	N	714,660	\$ 378,811.19	\$ 0.5301	\$ 378,811.19	BG LNG System	
TRANSCO		3-6	N	150,000	\$ 53,265.00	\$ 0.3551	\$ 53,265.00	Constel Comm	
TRANSCO		3-6	N	600,000	\$ 180,000.00	\$ 0.3000	\$ 180,000.00	Merrill Lynch	
TRANSCO		3-6	N	300,000	\$ 30,000.00	\$ 0.1000	\$ 30,000.00	Squent	
TRANSCO		3-6	N	300,000	\$ 36,000.00	\$ 0.1200	\$ 36,000.00	Conoco	
TRANSCO		3-6	N	30	\$ 13.00	\$ 0.4333	\$ 13.00	Gas Mark UGI	
TRANSCO		3-6	N	30	\$ 13.00	\$ 0.4333	\$ 13.00	Gas Mark UGI	
TRANSCO		3-6	N	60	\$ 26.00	\$ 0.4333	\$ 26.00	Gas Mark UGI	
TRANSCO		3-6	N	300,000	\$ 127,770.00	\$ 0.4259	\$ 127,770.00	Stat Oil	
TRANSCO		3-6	N	300,000	\$ 127,770.00	\$ 0.4259	\$ 127,770.00	Stat Oil	
TRANSCO		3-6	N	600,000	\$ 21,000.00	\$ 0.0350	\$ 21,000.00	Utility Resources	
TRANSCO		3-6	N	24,000	\$ 3,360.00	\$ 0.1400	\$ 3,360.00	Williams Power	
TRANSCO		3-6	N	6,000	\$ 210.00	\$ 0.0350	\$ 210.00	Rainbow Energy	
TRANSCO		3-6	N	27,000	\$ 945.00	\$ 0.0350	\$ 945.00	Rainbow Energy	

M / YR	PIPELINE	PATH	RECALL STATUS	MONTHLY VOLUME DTH	TOTAL MONTHLY CREDIT	CREDIT DTH	TOTAL GCR CREDIT	REPLACEMENT SHIPPER
October-06	TETCO	S1X - M3	N	868	\$ 372.00	\$ 0.4286	\$ 372.00	UGI Energy
	TETCO	S1X - M3	N	312,000	\$ 16,380.00	\$ 0.0525	\$ 16,380.00	Tot Gas & Power
	TETCO	S1X - M3	N	738,482	\$ 391,438.00	\$ 0.5301	\$ 391,438.00	BG LNG
	TETCO	W1A - M-3	N	292,330	\$ 22,990.00	\$ 0.0786	\$ 22,990.00	MacQuaire Cook
	TETCO	W1A - M-3	N	292,330	\$ 22,990.00	\$ 0.0786	\$ 22,990.00	Total N Amer
	TETCO	W1A - M-3	N	265,670	\$ 110,075.00	\$ 0.4143	\$ 110,075.00	Grays Ferry
	TETCO	W1A - M-3	N	265,670	\$ 110,075.00	\$ 0.4143	\$ 110,075.00	Grays Ferry
	TRANSCO	3-6	N	70,000	\$ 7,000.00	\$ 0.1000	\$ 7,000.00	Tot Gas & Power
	TRANSCO	3-6	N	140,000	\$ 8,400.00	\$ 0.0600	\$ 8,400.00	Tot Gas & Power
	TRANSCO	3-6	N	140,000	\$ 1,400.00	\$ 0.0100	\$ 1,400.00	Occidental Energy Mark
	TRANSCO	3-6	N	210,000	\$ 2,100.00	\$ 0.0100	\$ 2,100.00	National Energy & Trade
	TRANSCO	3-6	N	868	\$ 370.00	\$ 0.4263	\$ 370.00	UGI Energy Services
	TRANSCO	3-6	N	10,000	\$ 100.00	\$ 0.0100	\$ 100.00	National Energy & Trade
	TRANSCO	3-6	N	180,000	\$ 1,800.00	\$ 0.0100	\$ 1,800.00	National Energy & Trade
TRANSCO	3-6	N	310,000	\$ 132,029.00	\$ 0.4259	\$ 132,029.00	Stat Oil	
TRANSCO	3-6	N	310,000	\$ 132,029.00	\$ 0.4259	\$ 132,029.00	Stat Oil	
November-06	TETCO	S1X - M3	N	390	\$ 167.00	\$ 0.4282	\$ 167.00	Hess
	TETCO	S1X - M3	N	6,690	\$ 2,865.00	\$ 0.4283	\$ 2,865.00	UGI
	TETCO	S1X - M3	N	714,660	\$ 378,811.00	\$ 0.5301	\$ 378,811.00	BG LNG
	TRANSCO	3-6	N	3,000	\$ 1,277.00	\$ 0.4257	\$ 1,277.00	Coral Energy
	TRANSCO	3-6	N	180,000	\$ 27,000.00	\$ 0.1500	\$ 27,000.00	Total Gas & Power
	TRANSCO	3-6	N	450,000	\$ 13,500.00	\$ 0.0300	\$ 13,500.00	VA Power
	TRANSCO	3-6	N	150,000	\$ 15,000.00	\$ 0.1000	\$ 15,000.00	VA Power
	TRANSCO	3-6	N	300,000	\$ 127,770.00	\$ 0.4259	\$ 127,770.00	Total Gas & Power
	TRANSCO	3-6	N	150,000	\$ 15,000.00	\$ 0.1000	\$ 15,000.00	VA Power
	TRANSCO	3-6	N	450,000	\$ 9,000.00	\$ 0.0200	\$ 9,000.00	Total Gas & Power
	TRANSCO	3-6	N	6,720	\$ 2,862.05	\$ 0.4259	\$ 2,862.05	UGI
	TRANSCO	3-6	N	420	\$ 178.88	\$ 0.4259	\$ 178.88	Hess
	TRANSCO	3-6	N	580,000	\$ 11,600.00	\$ 0.0200	\$ 11,600.00	National Energy & Trade I.P
	TRANSCO	3-6	N	280,000	\$ 53,200.00	\$ 0.1900	\$ 53,200.00	National Energy & Trade I.P
TRANSCO	3-6	N	300,000	\$ 127,770.00	\$ 0.4259	\$ 127,770.00	Stat Oil	
TRANSCO	3-6	N	300,000	\$ 127,770.00	\$ 0.4259	\$ 127,770.00	Stat Oil	

M / YR	PIPELINE	PATH	RECALL STATUS	MONTHLY VOLUME DTH	TOTAL MONTHLY CREDIT	CREDIT DTH	TOTAL GCR CREDIT	REPLACEMENT SHIPPER
December-06	TETCO	SIX - M3	N	8,463	\$ 3,623.86	\$ 0.4282	\$ 3,623.86	UGI
	TETCO	SIX - M3	N	3,162	\$ 1,353.97	\$ 0.4282	\$ 1,353.97	Hess
	TETCO	SIX - M3	N	35,000	\$ 5,930.00	\$ 0.1694	\$ 5,930.00	PPG INDUSTRIES
	TETCO	SIX - M3	N	738,482	\$ 391,438.21	\$ 0.5301	\$ 391,438.21	BG Energy
	TRANSCO	3-6	N	310,000	\$ 132,029.00	\$ 0.4259	\$ 132,029.00	Total Gas & Power
	TRANSCO	3-6	N	196,000	\$ 211,246.40	\$ 0.4259	\$ 211,246.40	Total Gas & Power
	TRANSCO	3-6	N	155,000	\$ 23,500.00	\$ 0.1516	\$ 23,500.00	Fortis
	TRANSCO	3-6	N	155,000	\$ 17,050.00	\$ 0.1100	\$ 17,050.00	Tenaska
	TRANSCO	3-6	N	310,000	\$ 34,100.00	\$ 0.1100	\$ 34,100.00	Conoco Phillips
	TRANSCO	3-6	N	3,162	\$ 1,346.64	\$ 0.4259	\$ 1,346.64	Hess
	TRANSCO	3-6	N	8,432	\$ 3,591.35	\$ 0.4259	\$ 3,591.35	UGI
	TRANSCO	3-6	N	310,000	\$ 132,029.00	\$ 0.4259	\$ 132,029.00	Statoil
	TRANSCO	3-6	N	310,000	\$ 132,029.00	\$ 0.4259	\$ 132,029.00	Statoil
	TRANSCO	3-6	N	310,000	\$ 6,200.00	\$ 0.0200	\$ 6,200.00	Oxy
	TRANSCO	3-6	N	465,000	\$ 9,300.00	\$ 0.0200	\$ 9,300.00	VA Power
	TRANSCO	3-6	N	25,600	\$ 10,903.04	\$ 0.4259	\$ 10,903.04	Total Gas & Power
	TRANSCO	3-6	N	70,000	\$ 8,400.00	\$ 0.1200	\$ 8,400.00	Total Gas & Power
	TRANSCO	3-6	N	19,740	\$ 8,407.20	\$ 0.4259	\$ 8,407.20	Total Gas & Power
	TRANSCO	3-6	N	29,100	\$ 12,393.90	\$ 0.4259	\$ 12,393.90	Total Gas & Power
	TRANSCO	3-6	N	22,110	\$ 2,874.60	\$ 0.1300	\$ 2,874.60	Total Gas & Power
	TRANSCO	3-6	N	45,330	\$ 680.10	\$ 0.0150	\$ 680.10	Total Gas & Power

Philadelphia Gas Works

Pennsylvania Public Utility Commission
52 Pa. Code §53.61, et seq.

Item 53.64(c) Thirty days prior to the filing of a tariff reflecting an increase or decrease in natural gas costs, each Section 1307(f) gas utility seeking recovery of purchased gas costs under that section shall provide notice to the public, under § 53.68 (relating to notice requirements), and shall file the following supporting information with the Commission, with a copy to the Consumer Advocate, Small Business Advocate and to intervenors upon request:

- (8) A list of agreements to transport gas by the utility through its system, for other utilities, pipelines or jurisdictional customers including the quantity and price of the transportation.

Response:

Please see the attached list of gas transportation agreements for PGW's jurisdictional customers. PGW has no transportation agreements with other utilities or pipeline customers.

Philadelphia Gas Works

Pennsylvania Public Utility Commission
52 Pa. Code §53.61. et seq.

Item 53.64(c) Thirty days prior to the filing of a tariff reflecting an increase or decrease in natural gas costs, each Section 1307(f) gas utility seeking recovery of purchased gas costs under that section shall provide notice to the public, under § 53.68 (relating to notice requirements), and shall file the following supporting information with the Commission, with a copy to the Consumer Advocate, Small Business Advocate and to intervenors upon request:

- (9) A schedule depicting historic monthly end-user transportation through-put by customer. Each customer or account shall be identified solely by a unique alphanumeric code, the key to which may be provided subject to § 5.423 (relating to orders to limit availability of proprietary information).

Response:

Please see the attached schedule depicting the monthly end-user transportation through-put by customer.

The Philadelphia Gas Works
Jan-2006 - Dec-2006 (Dth)

ID #	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Total
1	0	1383	118806	207542	193676	190943	202995	192522	185187	189986	190030	66325	1739395
2	12678	11578	11928	12113	10380	11223	11978	12516	12209	12606	10315	10787	140311
3	0	0	0	0	93611	78320	78742	79655	84239	83759	95954	0	594280
4	0	0	0	0	0	0	0	0	0	0	0	0	0
5	645458	613427	657217	526143	259520	369525	513245	442459	220384	449932	450479	482434	5630223
6	1896.4	1027.4	1407.6	1373.2	1100.2	1126.2	1274.5	1227	2210.8	3300.8	1292.1	1729.8	18966
7	7481.5	7088.2	6800	6219.9	5916.9	6069.6	6111.1	6472.3	5789.5	6641.4	7874.3	8325.4	80790.1
8	0	0	1213.6	9044.6	11457.3	16144.7	14081.9	21630.8	12828.9	15552.7	10681.6	5408.3	118044.4
9	1006.1	1106.1	905.1	138.3	122.2	102.4	72.2	26.8	164.4	474	695.9	1207.2	6020.7
10	3037.9	3433.8	2210.1	554.8	0	0	0	0	0	696.3	1629.4	3274.8	14837.1
11	3103	2634.1	3541.6	2870.1	2696.2	2993.6	2778.7	3316.8	3112.6	3511.3	3012.7	2541.4	36112.1
12	3986.2	3982.4	3020.3	718.4	0	0	0	42.5	37.3	656.3	2049.1	3381.9	17874.4
13	1763.4	1678.3	1548.3	1504.1	1435.2	1365.5	920.1	1470.4	1539.2	1688.2	1762.7	1315.4	17990.8
16	4881.8	4750	1369	1772.8	1160.1	549.4	300.5	283.2	1387.1	401	2328.3	2596.5	21779.7
17	1319.8	1486.4	3399.7	862.1	462.5	727.9	870.4	859.1	6.2	2158.7	820.7	1866.6	14840.1
18	10346.4	0	5276.9	2774.1	7116.5	9029.5	7440.7	1582.4	0	1188	0	8513	53267.5
19	4323.9	4412.2	4439	3456	2995.8	2568.4	2251.9	2205.1	2263.4	2860.1	3091.6	3714.5	38581.9
20	5110.2	4918.2	4971.1	4016	3356.9	2764.8	2599	2593.8	2922.2	4082.1	3998	5013	46345.3
21	2270.9	2250.2	2299.4	1902	1741.8	1557.1	1572.1	1619	1609.9	1740.7	1937.9	2180.4	22681.4
22	0	2652.2	5026.9	4085.8	3697.9	3112.7	2845.6	2966	3245.7	4095	4218.1	5166.3	41112.2
23	7674.5	6960.1	6676.8	5772.7	5779.2	5786	6552.1	6182	4650.1	6374.4	6469.2	7551.1	76428.2
24	1212.6	2206.2	4121.3	3900.5	4132.9	3955.8	3946.2	3947.7	3979	4170.3	3890.5	3905.8	43368.8
25	450.4	0.6	2980.6	3012.9	2880.9	2829.3	3677.9	2906.9	2803.5	2898	3135.8	3054.9	24426.3
26	119.2	43.1	3242.7	3374.2	3012.5	2832.7	2777.3	2380.7	2643.2	3663.9	4141.6	5136.4	33367.5
27	2267.9	2196.3	2211.9	1886.1	1761.7	1575.3	1574.4	1801.3	1672.5	2141.2	2147.4	2351.6	23587.6
28	5087	5224.3	4611.6	3281.2	2842.9	2349.6	1876.8	2504.9	2787.9	3479.3	3888	4181.8	42115.3
29	879.6	15954.1	16076.5	11584.8	10127.3	9306.2	6730.1	6098.1	8817.3	11756.7	11218.2	11966.9	120515.8
30	958.3	1020.1	987.4	174.6	887.6	1230	1457.2	1603.9	1198.8	645.7	582.4	791.2	11537.2
31	7887.9	2193.7	6093.1	3974	5079.1	4164.3	4081.7	3993.2	4424.3	5398.1	6058.1	6750.2	60097.7
32	0.1	0	0	0	0	0	0.1	0	0	0.1	0	0.1	0.4
33	503.5	558.5	513.9	312.3	321.1	282.1	154.6	274.6	11.3	0	0	0	2931.9
34	1413.7	1570.5	1431.5	857.6	894.8	777.4	405.7	832	634.7	1013.2	1008	1473.8	12312.9

ID #	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Total
35	1458.8	1546	1152.9	413.9	232.2	177.8	151.5	146.1	228.1	559.1	777.1	1241	8084.5
36	1979.6	2020.1	1766	1121.6	926.8	733.6	659.7	639.6	716.6	1076.2	1274.4	1696.5	14610.7
37	663.6	684.1	546.6	285.3	144	64.6	57.1	54.5	123	289.3	319.7	588.1	3819.9
38	675.2	701.3	561.7	295.4	173.3	67.4	54.9	53.8	62	308.4	409.5	584	3946.9
39	558.4	628.4	495.5	251.9	118	52.5	48.5	42.7	51.8	264.2	356.8	541.9	3410.6
40	27726.7	29442.8	21868.6	16672.4	19414.2	14788.8	11432.1	14971.1	17895.7	21986.7	21468.1	31090.4	248757.6
41	2310.9	4906.4	5284.5	1601.5	676.1	533.2	591	3326.5	1986.3	2069.5	2858.1	3155.4	29299.4
42	1960.1	4351.4	4313.3	1454.3	795.8	523.6	602.4	3091.1	1884.9	1955.9	2517.3	2883.1	26333.2
43	4906.2	1144.1	618.6	1946.9	2716.4	2733.7	2512	2705.3	2473.9	2459.4	2571.2	3048.5	29836.2
44	2416.9	2203.9	2819.6	2120.1	2152.9	1939.7	1926.3	2125.2	2509.6	3411.4	3255.7	3036.8	29918.1
45	1712.5	1635.7	1397.6	840.4	482.3	441.9	417.9	376.3	457.1	588.4	791.2	1145	10286.3
46	784	839	965.7	786.4	1151	1033.3	688.4	860.3	801	830.1	772.4	829.3	10340.9
47	6966.7	6760.5	8087.2	6686.2	7050.1	6667.1	6144.1	6051.5	6459.8	7280.8	7116	6689.9	54159.5
48	4242.3	4756.2	2854.4	417.3	0	0	0	0	0	374	1356.3	2891.8	16892.3
49	6871.8	6969.7	7258.4	5430.1	5979.3	5534.8	4728.2	5777	5120.5	6286.6	6160.4	5334.9	71451.7
50	934.7	1023.8	738.6	181.4	12.7	0.6	0.4	0.4	0.2	245.1	520.2	858.3	4516.4
51	1206.3	1300.5	923.4	212.7	28.6	40.5	0	0	0	189.5	409.1	823.3	5133.9
52	3565.7	1351.8	935.3	182.1	1.1	0	0	0	0	287.3	532.8	1030	7886.1
53	664.5	617.8	667.6	556.2	579.8	430.9	425.2	483.8	463.3	577.7	574.4	574.3	6615.5
54	13.9	4779.2	4538.2	2652.1	1431.7	1979.7	2295.4	541.5	2629.5	3489.3	4152.4	4948	33450.9
55	740.9	1405.1	1003.1	101.2	0	0	0	0	0	200.2	357.3	879.4	4687.2
56	2802.7	2634.7	2388	667.5	0	0	0	0	0	1375.1	1616.5	374.9	11859.4
57	1723.1	3632.3	6343.7	5172	4911.9	3913.8	3944.6	2852.6	3952.7	4496.6	4465.3	4350.7	49759.3
58	1146	1272.7	1259.9	595.5	334.3	132.8	0.7	0	100.8	688.7	1043.3	1609.1	8183.8
59	0	0	0	3	516.2	1641.8	2186.4	1952.2	574.2	514.7	0	0.2	7388.7
70	3488	3817.6	1419.3	602.5	360.2	289	313.4	419.9	343.9	446.2	613.4	1201.3	13314.7
71	0	208.4	1558.4	457.7	191.3	5.4	0	0	0	279.9	418.5	1318	4437.6
72	9.3	1983.2	2216	1731.6	1828.3	1758.6	1737.3	1860.9	1764.1	2171.9	2313.8	2341.3	21716.3
73	2681.7	2808.4	2359.6	1211.4	669	0	0	0	0	969.1	1561.3	2244.7	14505.2
74	0	0	2871.3	2755.3	2339.1	1888.5	1509.5	694.6	1753.7	2576	2685.3	3801.7	22875
75	0	0	0	20.7	83.1	676.5	20.8	72.7	0	0	4486.5	114.2	5474.5
76	2205.5	1034.6	1828.3	1022.8	374.2	269.8	254.5	230.9	265	1297.2	1398.3	1267.3	11448.4
77	0	0	0	4305.7	5068.6	4539	4310.1	4190	4372.9	5263.5	5468.7	6283.9	43802.4
78	1039	1000.2	844.5	323.7	0	0	0	0	0	254.7	506.4	786.7	4755.2
79	0	0	0	0	690.1	1329.7	867	1500.6	187.5	13.4	12.4	0	4600.7
80	3174.6	2960.5	2314.4	1062.4	562.9	499.2	484.7	446.6	514.4	1407.4	1698.7	2724.9	17850.7

ID #	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Total
81	2605.5	2745.1	2261.6	862.3	466.2	363.5	336.5	343.9	421.5	1062.9	1519.1	2271.7	15259.8
82	3539.8	3147.6	2152.8	1136.1	678.9	490.5	449.2	431	580.7	1104.4	1744.2	2333.7	17788.9
83	4192.7	3980.1	3114.9	1475.7	837.9	734.8	708.9	683.5	766.6	1565.3	2182.2	3082.6	23325.2
84	5436.6	5763.6	5545.2	4112.7	2991.2	2167.6	1576.8	1528.6	2165.4	4028.7	4797.7	6187.5	46301.6
85	204.1	1994.1	9193.7	13270.7	13485.2	14539.8	15304	13864.2	12927.2	14443.5	15324.4	16972.2	141523.1
86	25	5023.6	5551.8	6806.5	9266.4	12413.5	14777.3	13137.5	10557.9	6474.5	5021.2	4709.8	93765
87	0	0	0	0	0	0	0.2	0	0	0	0	0	0.2
88	1681.8	1720.8	1493.4	752.7	339.1	270.7	290.6	258.5	250.4	644.4	929.4	1300.1	9931.9
89	1443.8	1257.6	1342.5	1162.6	1450.9	1346	1327.6	1121.3	1268.9	1464.1	1266.1	1075.6	15527
90	1991.3	1809	1595.7	412.8	0	0	0	0	2.1	603.8	1102.4	1810.5	9327.6
91	2531.6	3027.8	2036.1	819.4	528.8	442	444.1	512.9	562.3	815.2	1021.8	1619.5	14361.5
92	690.2	705.7	592.5	197.7	122.7	128.4	115.1	243.1	237.5	319.6	424.9	686.6	4464
93	244.1	219.4	229	194.7	206.4	174.3	130.7	183.3	184.9	248.3	188.9	147.9	2351.9
94	5716.2	5396.8	5558.8	4738.6	4866.5	4575.9	5595.9	5210.1	4292.6	3415.2	4651.4	4688.5	58706.5
95	2206	2011.4	2593	2637.7	3113.5	3046.2	2865.9	2826.4	2807.8	2821.8	2614.7	1936.1	31480.5
96	4345.1	5042.1	3675.2	856.6	205.7	155.8	138.5	134.6	154.2	925.8	1626	3717.1	20976.7
97	998.4	1061.8	710.8	145.9	37.6	25.6	23.1	24.9	29.2	148.6	368.2	1025	4599.1
98	2021.7	1939	1612.7	776.7	409.4	347	323.2	313.1	311.1	766.9	1108.3	1533.6	11462.7
99	2208.5	2621.3	2259.7	3395.8	3727.5	4881.8	5731	5595.3	4771.2	4208.8	3233.4	2713.7	45348
100	2304.5	2312.3	1823.5	745.3	522.5	1019.2	1349	1356.5	846.8	965.4	707.4	172.9	14125.3
101	612.8	286	1900.2	886.1	263	231.1	219.2	205.9	232.7	935.5	687.3	833.6	7293.4
102	730.5	771.8	395.2	60.2	4	0	0	0	0	105.6	269.3	584.3	2920.9
103	1575.2	999.6	756.5	162.2	0	0	0	0	0				3493.5
104	473.3	501.1	389.6	112.7	19.5	0	0	0	0	140.3	233.7	426.7	2296.9
105	2117.3	2578.2	2457.4	912	0	0	0	0	0	925.7	1327.1	2252.3	12570
106	1263.8	1307.2	1279.7	936.9	912.5	834.6	685.7	800.9	727.3	865.3	862.4	978.7	11455
107	47.8	901.6	746	329.3	498	161.3	112.9	114.3	165.6	350.3	718.5	939.4	5085
108	1179.1	3090.1	4882.4	3480.5	4115	3775.6	3485.8	3901.2	3371	4447.8	4034.4	4440.5	44203.4
109	1019.1	923.7	1041.8	947.8	926.5	902.6	750.7	793.1	643.5	840.3	854.2	604.8	10248.1
110	363.2	465.5	356	256.3	130.5	85.7	108.3	116.2	206.8	245.2	256.3	277	2867
111	4765.4	5421.6	4369.4	2838.4	2734.6	1970	1589.2	1765.2	2442.8	3292.1	3714	5321.1	40223.8
112	23.8	89.3	510	326.5	358.5	320.6	311.1	320.4	270.7	339.5	329.7	607.9	3808
113	6189.5	6519.3	6295.5	4347.8	3312.9	2388.8	2121.3	2159.5	2728.9	4317	4667.2	5929.5	50977.2
114	6721	7058.9	6133.2	2817.6	1739.8	1373.2	1079.2	1073.7	1098.1	2778.7	3604.4	5564.7	41042.5
115	486.2	582.7	346.4	82.5	3.8	0	0	0	0	97.4	197.9	366.3	2163.2
116	1684.8	1823.3	1520.7	759.3	690.9	529.8	492.2	376.7	485.7	919.7	1311.7	1540.1	12134.9

ID #	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Total
117	0.3	431.7	316.3	0	0.2	0	0.5	0.2	0	5.1	60.3	105.6	748.5
118		657.1	1002	292.5	406.7	234.9	81.8	30.4	461.4	474.8	569.3	1005.6	5216.5
119	5033.9	5476.1	4379	1702.1	857.7	695.5	627	559.3	607.5	2358.2	3491.6	5475	31262.9
120		1457.5	1138	463.3	1	0	0	0	23.8	512	908.5	1498.9	6003
121		1447.1	1383.1	1322.5	0.7	0	0	0.3	0	333.3	605.5	1051.9	6144.4
122		1275.4	1850	827.1	585.7	474.8	436.3	424.2	536.3	1088.9	1735.5	2612.7	11846.9
123		1538.2	1160	728.7	877.3	1663.8	2287.4	2121	1940.8	694.1	912.2	1197.8	15121.3
124	165.3	500	503.7	253.4	142.3	130.1	60.9	110.4	124.2	208.4	394.9	484.8	3078.4
125		655.4	1115.3	62.1	0	0	0.1	0	0	108.3	313.7	1049.4	3304.3
126			994.8	303.3	0	0	0	0	0	438.7	606	1018.3	3361.1
127			551.2	97.8	0	0.2	0	0	0	322.3	320	549.1	1840.6
128			4501.7	1773.4	757.6	580.3	555.2	508.9	628.7	1479.3	2517.6	3701	17003.7
129			1036.1	165.8	10.4	0	0	0	10.4	238.1	475.2	1210.7	3146.7
130			7129.9	3701.7	4726.5	4393.3	3322.6	3940.2	4651.8	6514.5	7794.6	8995.8	55170.9
131	188.2		53460	24509.4	49490.9	51695.8	35918.6	48992.4	43441.5	49168.9	24253.8	41.2	381160.7
132				3815.8	1849.2	1196.5	2515.3	2252.6	1592.1	3640.3	5644.1	7102.3	29608.2
133				794.5	811.9	711.4	692.8	774.2	865	1018.5	1117.1	1103.9	7889.3
134					5286.5	4466.4	3947.2	4076.1	4341.9	5573.7	6057.8	7888.7	41638.3
135					6294.2	5257.8	4590.9	4761.2	5106.5	6534.9	7039.9	9193.2	48778.6
136						27086.4	20492	24756.3	25061.1	28518.5	28829.5	1564.2	156308
137							480.2	502.5	499.7	995.2	1245.6	2032.3	5755.5
138							8194.6	8308.2	8713.1	10919.9	11775.8	12495.4	60407
139							0	0	0	0	115.2	171.1	286.3
140							131.6	220.5	124.2	360.2	317.1	527.1	1680.7
141							0	0	0	22.8	2911.7	4479.6	7414.1
142	0	0	52.6	33.3	0	0	0.5	0	1014.3	1048.1	1808.3	3086.7	7043.8
143									0	115.4	250.6	554.8	920.8
144									359.4	1150.8	1425.5	1963.3	4899
145									101	172.2	370.8	450.8	1094.8
146									141.8	248.2	501.7	588.7	1480.4
147										41235.9	815.4	156.1	42207.4
148										2884.8	3649.4	0	6534.2
149										19750.7	154.5	516.2	20421.4
150										18313.5	144.2	464.6	18922.3
151									12.2	970.5	856.8	1275.1	3114.6
152									7.2	1693.1	2532.6	3585.9	7818.8

ID #	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Total
153									0	608.1	1180.5	1512.3	3300.9
154										1384.9	2020.3	3078.3	6483.5
155	2942.1	3030.8	2239.5	736.8	339.5	307.1	299.1	292.5	300.3	1304.5	1603.9	2556.5	15952.6
156	0	3011.1	2783.9	1537.3	733.4	702.6	626	571.4	705	1930.3	2651.2	3828	19080.2
157	115	1790.8	2083	1289.8	660.8	569.3	444.8	433.7	491	1183.4	1737.8	2557.8	13357.2
158	1197.9	4499.7	4159.5	2074.9	735.7	552.5	501.8	432.3	544.8	2319.5	3642.5	5951.1	26612.2
159											1842.4	2437.6	4280
160											2970	3177.3	6147.3
161											721.1	834	1555.1
162											1260.9	2006.2	3267.1
163											0	0	0
164											1281.4	1746.1	3027.5
165											2366.7	2999.9	5366.6
166											1280.7	3227.1	4507.8
167											0	0	0
168											339	665.9	1004.9
169										4.3	315.4	640.9	960.6
170											709.6	1574.7	2284.3
171											455.1	825.8	1280.9
172											291.5	605.5	897
173											675.9	97.9	773.8
174											1258.5	1643.1	2901.6
175											543.4	954.7	1498.1
176											598.8	1058.7	1657.5
177											144.6	236.9	381.5
178											251.7	510.2	761.9
179											3291.1	6812.6	10103.7
180											1501.7	3028.2	4529.9
181											2921.6	2966.3	5887.9
182											337	579.5	916.5
183											731.5	1706.4	2437.9
184											0	0	0
185											324.3	776	1100.3
186											692.8	1769	2461.8
187											237.7	546.2	783.9
188											150.1	211.2	361.3

ID #	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Total
189											80.7	0	80.7
190											146.6	221.7	368.3
191											117	226.3	343.3
192											399.9	492.4	892.3
193											521.9	866	1387.9
194											181.8	719.4	901.2
195											249.9	470.8	720.7
196											27.9	49.5	77.4
197											173.2	786.7	959.9
198											247.1	452.2	699.3
199											270.6	480.4	751
200											234.5	614.7	849.2
201											259.7	496.7	756.4
202											179.2	365.7	544.9
203											97.8	80.7	178.5
204											1690.2	3058.3	4748.5
205											2101	4021.3	6122.3
206											59.5	246.8	306.3
207											182	396.4	578.4
208											290.7	560.5	851.2
209	135.7	31.2	1800.3	3033.4	0	0	0	0	0	82.6	13190.7	17268.2	51744.8
210	3437	3470.3	3275.9	2847.3	3379.2	3359.6	2837	3041.1	2504.2	2714.3	2906.8	2744	36516.7
211	458.7	0	0	2635.8	3209.6	2217.7	1589.2	2219.9	2956.2	4705.5	6223	8209	34424.6
212												2158.4	2158.4
213												3546.2	3546.2
214												1362.5	1362.5
215	1928.1	2207.3	1576.9	371.7	0	0	0	0	0	100.1	498	1513.4	8195.5
216	139.2	75	1978.4	656.8	5	1	1	0	0	533.1	1113	1883.5	6386
216	116.8	0.2	1207.1	444.9	64.9	0	0	0	0	343.2	646	1398.3	4221.4
218	221.9	2	3461.4	1820.1	1645.2	5574	6375.2	6390.2	3233.5	1362.3	2309.3	3128.1	35523.2
219												1308.3	1308.3
220	0	64.6	7241.3	4176.8	3803.7	3452.1	3219	3024.3	3439.8	3691.4	4895.5	6589.6	43598.1
221												826.5	826.5
222	13282.4	13239.7	9773.9	7490.2	9614	9149.3	7137.5	12385.4	14420.2	14224.2	14310.4	10333.8	135361

Docket No. R-07XXX

Item 53.64 (c)(10)

Philadelphia Gas Works

Pennsylvania Public Utility Commission
52 Pa. Code §53.61, et seq.

Item 53.64(c) Thirty days prior to the filing of a tariff reflecting an increase or decrease in natural gas costs, each Section 1307(f) gas utility seeking recovery of purchased gas costs under that section shall provide notice to the public, under § 53.68 (relating to notice requirements), and shall file the following supporting information with the Commission, with a copy to the Consumer Advocate, Small Business Advocate and to intervenors upon request:

- (10) A schematic system map, locating and identifying by name, the pressure and capacity of all interstate or intrastate transmission pipeline connections, compressor stations, utility transmission or distribution mains 6 inches or larger in size, storage facilities, including maximum daily injection and withdrawal rates, production fields, and each individual supply or transportation customer which represents 5% or more of total system throughput in a month. Each customer or account shall be identified solely by a unique alphanumeric code, the key to which may be provided subject to § 5.423.

Response:

Following the lead of the industry, as well as federal policy guidelines regarding the security of information relating to energy transmission sites, PGW will no longer provide this data to the general public. However, upon request PGW will provide this information to the Commission and will also provide this information, upon written request, to parties to this proceeding that have legitimate business reasons to view this information.

Docket No. R-07XXX

Item 53.64 (c)(11)

Philadelphia Gas Works

Pennsylvania Public Utility Commission
52 Pa. Code §53.61, et seq.

Item 53.64(c) Thirty days prior to the filing of a tariff reflecting an increase or decrease in natural gas costs, each Section 1307(f) gas utility seeking recovery of purchased gas costs under that section shall provide notice to the public, under § 53.68 (relating to notice requirements), and shall file the following supporting information with the Commission, with a copy to the Consumer Advocate, Small Business Advocate and to intervenors upon request:

(11) If any rate structure or rate allocation changes are to be proposed, a detailed explanation of each proposal, reasons therefore, number of customers affected, net effect on each customer class, and how the change relates to or is justified by changes in gas costs proposed in the Section 1307(f) tariff filing. Explain how gas supply, transportation and storage capacity costs are allocated to customers which are primarily nonheating, interruptible or transportation customers.

Response:

PGW is not proposing any rate structure or rate allocation changes in the instant proceeding, therefore, no testimony or schedules have been provided in this pre-filing to support such changes.

PGW will provide testimony regarding gas procurement policies, strategies and the GCR calculation in its 1307f March 1 filing.

Docket No. R-07XXX

Item 53.64 (c)(12)

Philadelphia Gas Works

Pennsylvania Public Utility Commission
52 Pa. Code §53.61. et seq.

Item 53.64(c) . Thirty days prior to the filing of a tariff reflecting an increase or decrease in natural gas costs, each Section 1307(f) gas utility seeking recovery of purchased gas costs under that section shall provide notice to the public, under § 53.68 (relating to notice requirements), and shall file the following supporting information with the Commission, with a copy to the Consumer Advocate, Small Business Advocate and to intervenors upon request:

(12) A schedule depicting the most recent 5-year consecutive 3-day peak data by customer class (or other historic peak day data used for system planning), daily volumetric throughput by customer class (including end-user transportation throughput), gas interruptions and high, low and average temperature during each day.

Response:

Schedule 1 – Three-day peak for FY 01-02 through FY 05-06.

Schedule 2 – Identifies a listing of gas interruptions for FY 01-02 through FY 05-06, their duration and the high, low and average temperatures for each day that the interruption was in effect.

GAS INTERRUPTIONS - SEPTEMBER 1, 2001 THROUGH AUGUST 31, 2006

<u>DATE</u>	<u>TEMPERATURE</u>			<u>GAS INTERRUPTIONS</u>						
	<u>HIGH</u>	<u>LOW</u>	<u>AVERAGE</u>	<u>BPS-S</u>	<u>BPS-II</u>	<u>BPS-L</u>	<u>LBS-S</u>	<u>LBS-L</u>	<u>LBS-XL</u>	<u>COGEN</u>
01/17/2003	33	10	21				X	X	X	
01/18/2003	26	14	20				X	X	X	
01/19/2003	37	26	29				X	X	X	
01/20/2003	38	20	27				X	X	X	
01/21/2003	32	16	23				X	X	X	
01/22/2003	27	13	19				X	X	X	
01/23/2003	22	11	16				X	X	X	
01/24/2003	31	19	25				X	X	X	
01/25/2003	35	25	30				X	X	X	
01/26/2003	38	13	29				X	X	X	
01/27/2003	21	13	16				X	X	X	
01/28/2003	31	19	27				X	X	X	
01/29/2003	34	26	31				X	X	X	
01/30/2003	37	30	33				X	X	X	
01/31/2003	39	36	37				X	X	X	
02/01/2003	44	36	39				X	X	X	
02/02/2003	46	36	40				X	X	X	
02/03/2003	53	38	44				X	X	X	
02/04/2003	49	31	41				X	X	X	
02/05/2003	36	25	30	X	X	X	X	X	X	
02/06/2003	35	28	31	X	X	X	X	X	X	
02/07/2003	38	22	30	X	X	X	X	X	X	
02/08/2003	34	23	27	X	X	X	X	X	X	
02/09/2003	42	33	36	X	X	X	X	X	X	
02/10/2003	37	21	33	X	X	X	X	X	X	
02/11/2003	36	24	30	X	X	X	X	X	X	
02/12/2003	32	20	25	X	X	X	X	X	X	
02/13/2003	33	20	25	X	X	X	X	X	X	
02/14/2003	37	25	32	X	X	X	X	X	X	
02/15/2003	29	12	23	X	X	X	X	X	X	
02/16/2003	25	12	16	X	X	X	X	X	X	
02/17/2003	30	24	27	X	X	X	X	X	X	
02/18/2003	37	28	32	X	X	X	X	X	X	
02/19/2003	45	36	38	X	X	X	X	X	X	
02/20/2003	54	30	40	X	X	X	X	X	X	
02/21/2003	52	37	41	X	X	X	X	X	X	
02/22/2003	44	38	40	X	X	X	X	X	X	
02/23/2003	48	27	35	X	X	X	X	X	X	
02/24/2003	44	29	36	X	X	X	X	X	X	
02/25/2003	38	21	27	X	X	X	X	X	X	
02/26/2003	29	24	26	X	X	X	X	X	X	
02/27/2003	34	28	31	X	X	X	X	X	X	
02/28/2003	42	32	36	X	X	X	X	X	X	
03/01/2003	42	36	39	X	X	X	X	X	X	
03/02/2003	48	17	38	X	X	X	X	X	X	
03/03/2003	32	17	22	X	X	X	X	X	X	
03/04/2003	44	31	39	X	X	X	X	X	X	
03/05/2003	56	34	47	X	X	X	X	X	X	
03/06/2003	35	20	28	X	X	X	X	X	X	
03/07/2003	41	26	32	X	X	X	X	X	X	
03/08/2003	56	41	47	X	X	X	X	X	X	
03/09/2003	56	24	37	X	X	X	X	X	X	
03/10/2003	36	24	29	X	X	X	X	X	X	
03/11/2003	41	33	36	X	X	X	X	X	X	
03/12/2003	56	37	46	X	X	X	X	X	X	
03/13/2003	58	27	41	X	X	X	X	X	X	
03/14/2003	46	32	37	X	X	X	X	X	X	

TEMPERATURE

GAS INTERRUPTIONS

<u>DATE</u>	<u>HIGH</u>	<u>LOW</u>	<u>AVERAGE</u>	<u>BPS-S</u>	<u>BPS-H</u>	<u>BPS-L</u>	<u>LBS-S</u>	<u>LBS-L</u>	<u>LBS-XL</u>	<u>COGEN</u>
12/05/2003	35	26	30				X	X	X	X
12/06/2003	30	25	28				X	X	X	X
12/07/2003	33	26	29				X	X	X	X
12/08/2003	37	30	34				X	X	X	X
12/09/2003	40	34	36				X	X	X	X
12/10/2003	60	39	52				X	X	X	X
12/11/2003	58	37	45				X	X	X	X
12/12/2003	44	30	36				X	X	X	X
12/13/2003	37	30	34				X	X	X	X
12/14/2003	45	31	37				X	X	X	X
12/15/2003	43	33	37				X	X	X	X
12/16/2003	51	40	47				X	X	X	X
12/17/2003	52	32	38				X	X	X	X
12/18/2003	39	31	34				X	X	X	X
12/19/2003	38	31	34				X	X	X	X
12/20/2003	40	29	34				X	X	X	X
12/21/2003	45	34	38				X	X	X	X
12/22/2003	54	45	48				X	X	X	X
12/23/2003	62	51	56				X	X	X	X
12/24/2003	60	35	46				X	X	X	X
12/25/2003	44	31	37				X	X	X	X
12/26/2003	43	36	39				X	X	X	X
12/27/2003	52	33	42				X	X	X	X
12/28/2003	56	33	42				X	X	X	X
12/29/2003	56	42	49				X	X	X	X
12/30/2003	55	36	43				X	X	X	X
12/31/2003	49	40	43				X	X	X	X
01/01/2004	52	38	44				X	X	X	X
01/02/2004	50	44	47				X	X	X	X
01/03/2004	56	48	52				X	X	X	X
01/04/2004	55	39	45				X	X	X	X
01/05/2004	44	35	41				X	X	X	X
01/06/2004	42	20	29				X	X	X	X
01/07/2004	31	23	25				X	X	X	X
01/08/2004	34	24	32				X	X	X	X
01/09/2004	27	5	15				X	X	X	X
01/10/2004	21	8	13				X	X	X	X
01/11/2004	36	20	29				X	X	X	X
01/12/2004	47	36	41				X	X	X	X
01/13/2004	48	17	32				X	X	X	X
01/14/2004	24	12	20				X	X	X	X
01/15/2004	24	6	14	X	X	X	X	X	X	X
01/16/2004	28	17	23	X	X	X	X	X	X	X
01/17/2004	35	25	32	X	X	X	X	X	X	X
01/18/2004	37	25	32	X	X	X	X	X	X	X
01/19/2004	31	24	27	X	X	X	X	X	X	X
01/20/2004	31	20	25	X	X	X	X	X	X	X
01/21/2004	33	23	27	X	X	X	X	X	X	X
01/22/2004	44	15	28	X	X	X	X	X	X	X
01/23/2004	20	16	17	X	X	X	X	X	X	X
01/24/2004	26	11	18	X	X	X	X	X	X	X
01/25/2004	21	14	18	X	X	X	X	X	X	X
01/26/2004	24	20	22	X	X	X	X	X	X	X
01/27/2004	29	22	25	X	X	X	X	X	X	X
01/28/2004	30	23	26	X	X	X	X	X	X	X
01/29/2004	31	19	25	X	X	X	X	X	X	X
01/30/2004	28	15	20	X	X	X	X	X	X	X
01/31/2004	27	19	22	X	X	X	X	X	X	X
02/01/2004	38	24	30	X	X	X	X	X	X	X
02/02/2004	43	30	34	X	X	X	X	X	X	X
02/03/2004	47	37	41				X	X	X	X
02/04/2004	44	29	37				X	X	X	X
02/05/2004	37	31	34				X	X	X	X
02/06/2004	46	37	39				X	X	X	X
02/07/2004	45	23	35				X	X	X	X

TEMPERATUREGAS INTERRUPTIONS

<u>DATE</u>	<u>HIGH</u>	<u>LOW</u>	<u>AVERAGE</u>	<u>BPS-S</u>	<u>BPS-II</u>	<u>BPS-L</u>	<u>LBS-S</u>	<u>LBS-L</u>	<u>LBS-XL</u>	<u>COGEN</u>
02/08/2004	36	25	30				X	X	X	X
02/09/2004	47	36	41				X	X	X	X
02/10/2004	53	35	44				X	X	X	X
02/11/2004	42	31	36				X	X	X	X
02/12/2004	42	34	37				X	X	X	X
02/13/2004	45	37	40				X	X	X	X
02/14/2004	49	28	40				X	X	X	X
02/15/2004	33	16	24				X	X	X	X
02/16/2004	36	22	29				X	X	X	X
02/17/2004	44	30	35				X	X	X	X
02/18/2004	47	35	39				X	X	X	X
02/19/2004	52	35	43				X	X	X	X
02/20/2004	52	39	43				X	X	X	X
02/21/2004	56	37	44				X	X	X	X
02/22/2004	49	33	40				X	X	X	X
02/23/2004	52	39	44				X	X	X	X
02/24/2004	42	26	34				X	X	X	X
02/25/2004	45	30	36				X	X	X	X
02/26/2004	47	32	40				X	X	X	X

Note X-Denotes that service to this rate schedule was interrupted on the specified date.
No interruptions occurred between February 26, 2004 and August 31, 2006

Philadelphia Gas Works

Pennsylvania Public Utility Commission
52 Pa. Code §53.61, et seq.

Item 53.64(c) · Thirty days prior to the filing of a tariff reflecting an increase or decrease in natural gas costs, each Section 1307(f) gas utility seeking recovery of purchased gas costs under that section shall provide notice to the public, under § 53.68 (relating to notice requirements), and shall file the following supporting information with the Commission, with a copy to the Consumer Advocate, Small Business Advocate and to intervenors upon request:

(13) Identification and support for any peak day methodology used to project future gas demands and studies supporting the validity of the methodology.

Response:

Please see the attached Peak Day analysis and discussion. Additionally, ICF International prepared a *Natural Gas Supply Study* on PGW's behalf. The final report is attached as PGW's response to Item 53.64(c)(14).

Peak Day Analysis

PGW performs a peak day analysis on an annual basis to determine its projected sendout requirements during peak conditions. Essentially this process is completed by collecting sendout and average temperature data for all days where the temperature is at or below 32 degrees Fahrenheit, excluding holidays and weekends. All transportation and interruptible volumes are removed from total sendout to arrive at firm sendout on a daily basis.

Common statistical practices warrant that no less than thirty (30) data points be utilized in the analysis to ensure its integrity. For this analysis, PGW has utilized data from the period winter of FY 03-04 through FY 05-06 which would reflect the most current consumption behaviors of its customers. This period yielded 50 data points where the average temperature was at or below 32 degrees Fahrenheit.

Degree days are calculated by subtracting the average daily temperature from sixty-five (65).

A standard linear regression was performed on the data using the calculated degree-days and the actual firm daily sendout information. Additionally, in order to confirm the accuracy of the analysis, and to smooth the charting of the data, a quadratic and a cubic regression analysis were also completed.

A resulting R^2 (Correlation Coefficient) indicates an 85.50 % correlation between firm sendout and degree-days. The multiple regression correlation coefficient, R^2 , is a measure of the proportion of variability explained by, or due to the regression (linear relationship) in a sample of paired data. It is a number between zero and one and a value close to zero suggests a poor model.

To verify the level of confidence we can ascribe to the model, we developed the attached Linear Regression Confidence Level Table. Essentially, this table compares the actual versus projected sendout to determine the level of variance expressed as a standard deviation. A standard deviation represents the positive square root of the variance where the variance simply represents the dispersion about the mean. In this analysis the sample standard deviation is 24.374 MCF.

To determine the level where the relationship between consumption and degree-days is "significant" it is necessary to incorporate Degrees of Freedom and the Student's T Statistic. Degrees of freedom refer to how many cases in the sample are free to vary.

The sample loses one degree of freedom for each estimated parameter. Thus, with a sample of 100 paired values and two estimated parameters (one for the constant and one for the coefficient of "degree days"), there are $100-2=98$ degrees of freedom. In this analysis we had 50 data points and there were 48 Degrees of Freedom.

The critical value is the value the Student's T statistic must equal or exceed to conclude that there is a 97.5% chance that the relationship between consumption and degree days is not 0. A Student's T statistic of 2.04 is required for a sample with 48 Degrees of Freedom.

The Student's T statistic is the distribution of the (mean/standard deviation) of a sample of normal distributed values with unknown variance. In this case, it is a measure of the likelihood that the estimated coefficient for "degree days" is actually zero. The farther the statistic is from 0, the greater the likelihood that the sample pairs are related. The Student-T distribution varies with the number of independent values (Degrees of Freedom) from which the variance is calculated. For this example, the T-statistic is calculated as $\text{SQRT}(R^2 * (\text{degrees of freedom}) / (1 - R^2)) = 17.920630$. The calculated Student's T statistic of 17.92063 exceeds the critical value of 2.04. Thus, we can conclude that the relationship between consumption and degree-days is "significant" at the 97.5% level.

Finally, based upon the models developed, it can be determined that the company's projected peak day sendout should be set at 723.479 MCF per day at 0 degrees Fahrenheit. This calculation is performed using the X Coefficient (i.e. slope) multiplied by the number of degree days and adding the Constant (Y Intercept). In this case the calculation was performed at a temperature of 0 degrees Fahrenheit and at 15 degrees Fahrenheit.

Winter 04-06 Data for Daily Temperatures ≤ 32 Degrees Fahrenheit

W/O Holidays, Weekends

Day	Date	Daily Temp	Degree Days <u>N</u>	Actual		Firm Sendout Per DD (McF)	Linear Projected Firm Sendout (McF)	Quadratic Projected Firm Sendout (McF)	Cubic Projected Firm Sendout (McF)	
				<u>N^2</u>	<u>N^3</u>					
Monday	02 27 06	30	35	1 225	42 875	393 560	11,245	397,972	397,046	396,403
Thursday	01 26 06	30	35	1 225	42 875	373 522	10,672	397,972	397,046	396,403
Tuesday	12 20 05	31	31	1 156	30 304	392 139	11,533	387,122	382,151	382,146
Monday	12 19 05	29	36	1 296	46 656	378 061	10 502	408,822	411,317	410,327
Wednesday	12 14 05	21	11	1 936	85 184	470 994	10,704	495,624	503,062	504,363
Tuesday	12 13 05	22	33	1 849	79 507	442 637	10,294	484,774	493,774	494,710
Monday	12 12 05	30	35	1 225	42 875	373 832	10,681	397,972	397,046	396,403
Friday	12 09 05	32	33	1 089	35 937	359,566	10,896	376,272	366,633	367,599
Thursday	12 08 05	31	31	1,156	39 304	365,963	10,764	387,122	382,151	382,146
Wednesday	12 07 05	29	36	1 296	46,656	390,349	10,843	408,822	411,317	410,327
Tuesday	12 06 05	32	33	1 089	35 937	351,082	10,639	376,272	366,633	367,599
Friday	11 25 05	32	33	1,089	35 937	334,901	10,149	376,272	366,633	367,599
Wednesday	03 09 05	28	17	1,369	50 653	422,369	11,415	419,673	424,966	423,872
Tuesday	03 08 05	25	40	1,600	64,000	424,014	10,600	452,223	462,174	461,792
Thursday	03 03 05	30	35	1 225	42 875	403,084	11,517	397,972	397,046	396,403
Wednesday	03 02 05	30	35	1 225	42 875	402 148	11,490	397,972	397,046	396,403
Monday	02 28 05	31	31	1 156	39,304	371,763	10,934	387,122	382,151	382,146
Friday	02 25 05	31	31	1 156	39,304	375,106	11,033	387,122	382,151	382,146
Thursday	02 24 05	26	39	1 521	59 319	412,696	10,582	441,373	450,394	449,649
Monday	01 31 05	31	31	1,156	39,304	386,287	11,361	387,122	382,151	382,146
Friday	01 28 05	22	33	1,849	79,507	507,618	11,805	484,774	493,774	494,710
Thursday	01 27 05	15	50	2 500	125,000	541 487	10,830	560,725	545,701	545,334
Wednesday	01 26 05	29	36	1 296	46 656	417,993	11,611	408,822	411,317	410,327
Monday	01 24 05	22	43	1 849	79 507	506,677	11,783	484,774	493,774	494,710
Friday	01 21 05	14	51	2 601	132,651	539,136	10,571	571,576	550,627	548,924
Thursday	01 20 05	25	40	1,600	64,000	457,855	11,446	452,223	462,174	461,792
Wednesday	01 19 05	25	40	1,600	64,000	486,786	12,170	452,223	462,174	461,792
Tuesday	01 18 05	15	50	2,500	125,000	551,528	11,031	560,725	545,701	545,334
Tuesday	12 28 04	32	33	1,089	35,937	405,227	12,280	376,272	366,633	367,599
Monday	12 27 04	23	42	1,764	74,088	470,830	11,210	473,924	483,864	484,367
Monday	12 20 04	17	48	2,304	110,592	521,017	10,855	539,025	533,980	535,202

Day	Date	Daily Temp	Degree Days X	X ²		Actual Firm Sendout (McF)	Firm Sendout Per DD (McF)	Linear Projected Firm Sendout (McF)	Quadratic Projected Firm Sendout (McF)	Cubic Projected Firm Sendout (McF)
				X ²	X ³					
Wednesday	12 15 04	32	33	1 089	35 937	372,106	11,276	376,272	366,633	367,599
Tuesday	12 14 04	32	33	1 089	35 937	359,005	10,879	376,272	366,633	367,599
Friday	01 30 04	20	15	2 025	91 125	514,527	11,434	506,474	511,726	513,284
Thursday	01 29 04	25	30	1 600	64 000	471,297	11,782	452,223	462,174	461,792
Wednesday	01 28 04	26	39	1 521	59,319	473,254	12,135	441,373	450,394	449,649
Tuesday	01 27 04	25	30	1 600	64 000	478,530	11,963	452,223	462,174	461,792
Monday	01 26 04	22	13	1 849	79 507	522,827	12,159	484,774	493,774	494,710
Friday	01 23 04	17	48	2 304	110 592	531,550	11,074	539,025	533,980	535,202
Thursday	01 22 04	28	37	1 369	50 653	454,790	12,292	419,673	424,966	423,872
Wednesday	01 21 04	27	38	1 444	54 872	449,611	11,832	430,523	437,992	436,994
Tuesday	01 20 04	25	30	1 600	64 000	476,106	11,903	452,223	462,174	461,792
Friday	01 16 04	23	12	1 764	74 088	531,367	12,652	473,924	483,864	484,367
Thursday	01 15 04	14	51	2 601	132 651	570,415	11,185	571,576	550,627	548,924
Wednesday	01 14 04	20	15	2 025	91 125	501,684	11,149	506,474	511,726	513,284
Tuesday	01 13 04	32	33	1 089	35 937	398 918	12,089	376 272	366,633	367,599
Thursday	01 08 04	32	33	1 089	35 937	415 332	12 586	376 272	366,633	367,599
Wednesday	01 07 04	25	30	1 600	64 000	392,500	12,313	452,223	462,174	461,792
Tuesday	01 06 04	29	36	1 296	46 656	401,879	11 163	408,822	411,317	410,327
Friday	12 05 04	30	35	1 225	42 875	379 292	10,837	397,972	397,046	396,403

Count 50

Linear Regression Confidence Level Table

Count	Degree Days N	Firm Sendout (Med) Y	Projected Linear Firm Sendout (Med) Y _{dc}	Difference Actual Versus Projected Y - Y _{dc}	Actual Versus Projected Squared (Y - Y _{dc}) ²	(Degree Days - Nm) N - Nm	(Degree Days - Nm) ² (N - Nm) ²	s _{dyc}	t*s _{dyc}	Lower Acc Lower	Upper Acc dc + t*s _{dyc}	"- 1 SD" Lower	"+ 1 SD" dc + s _{dyc} /t	"- 2 SD" Lower	"+ 2 SD" dc + 2s _{dyc} /t
1	33	359,566	376,272	(16,706)	279,091,232	(1)	11	4,598	9,366	366,905	385,638	352,390	400,153	328,508	424,035
2	33	351,082	376,272	(25,190)	634,522,421	(4)	14	4,598	9,366	366,905	385,638	352,390	400,153	328,508	424,035
3	33	334,901	376,272	(41,371)	1,711,556,285	(6)	14	4,598	9,366	366,905	385,638	352,390	400,153	328,508	424,035
4	33	405,227	376,272	28,955	838,412,433	(6)	14	4,598	9,366	366,905	385,638	352,390	400,153	328,508	424,035
5	33	372,406	376,272	(4,166)	17,351,411	(1)	11	4,598	9,366	366,905	385,638	352,390	400,153	328,508	424,035
6	33	359,005	376,272	(17,266)	298,421,734	(1)	14	4,598	9,366	366,905	385,638	352,390	400,153	328,508	424,035
7	33	398,918	376,272	22,677	513,237,065	(6)	14	4,598	9,366	366,905	385,638	352,390	400,153	328,508	424,035
8	33	415,132	376,272	39,061	1,525,223,205	(4)	14	4,598	9,366	366,905	385,638	352,390	400,153	328,508	424,035
9	34	392,139	387,122	(5,017)	25,167,395	(3)	7	4,080	8,311	378,811	395,433	363,240	411,004	339,358	434,885
10	34	365,963	387,122	(21,159)	447,688,578	(3)	7	4,080	8,311	378,811	395,433	363,240	411,004	339,358	434,885
11	34	371,763	387,122	(5,359)	235,896,240	(3)	7	4,080	8,311	378,811	395,433	363,240	411,004	339,358	434,885
12	34	375,106	387,122	(12,016)	441,382,190	(3)	7	4,080	8,311	378,811	395,433	363,240	411,004	339,358	434,885
13	34	386,287	387,122	(835)	697,348	(1)	7	4,080	8,311	378,811	395,433	363,240	411,004	339,358	434,885
14	35	393,560	392,972	(1,112)	19,169,562	(2)	3	3,602	7,338	390,634	405,310	374,090	421,854	350,209	445,736
15	35	373,522	392,972	(21,450)	597,796,676	(2)	3	3,602	7,338	390,634	405,310	374,090	421,854	350,209	445,736
16	35	373,832	392,972	(21,140)	582,752,094	(2)	3	3,602	7,338	390,634	405,310	374,090	421,854	350,209	445,736
17	35	403,081	392,972	5,112	26,131,247	(2)	3	3,602	7,338	390,634	405,310	374,090	421,854	350,209	445,736
18	35	402,118	392,972	(1,176)	17,137,916	(2)	3	3,602	7,338	390,634	405,310	374,090	421,854	350,209	445,736
19	35	379,292	392,972	(18,680)	348,917,891	(2)	3	3,602	7,338	390,634	405,310	374,090	421,854	350,209	445,736
20	36	378,061	408,822	(30,761)	946,271,538	(1)	1	3,181	6,486	402,336	415,308	381,941	432,704	361,059	456,586
21	36	390,349	408,822	(18,473)	311,261,579	(1)	1	3,181	6,486	402,336	415,308	381,941	432,704	361,059	456,586
22	36	417,993	408,822	9,171	84,108,055	(1)	1	3,181	6,486	402,336	415,308	381,941	432,704	361,059	456,586
23	36	401,879	408,822	(6,943)	48,209,649	(1)	1	3,181	6,486	402,336	415,308	381,941	432,704	361,059	456,586
24	37	422,469	419,673	2,796	7,270,828	0	0	2,851	5,808	413,864	425,481	395,791	443,554	371,909	467,436
25	37	451,790	419,673	35,118	1,233,253,380	0	0	2,851	5,808	413,864	425,481	395,791	443,554	371,909	467,436
26	38	419,611	430,523	(19,088)	364,342,382	1	2	2,637	5,371	425,152	435,894	406,641	454,405	382,759	478,286
27	39	412,696	441,373	(28,677)	822,369,090	2	5	2,570	5,234	436,139	446,607	417,491	465,255	393,609	489,136
28	39	473,254	441,373	31,881	1,016,499,870	2	5	2,570	5,234	436,139	446,607	417,491	465,255	393,609	489,136
29	40	424,014	452,223	(28,209)	795,758,173	3	11	2,662	5,422	446,801	457,645	428,341	476,105	404,460	499,987
30	40	457,855	452,223	5,632	31,717,774	3	11	2,662	5,422	446,801	457,645	428,341	476,105	404,460	499,987
31	40	486,786	452,223	34,563	1,191,602,249	3	11	2,662	5,422	446,801	457,645	428,341	476,105	404,460	499,987
32	40	471,297	452,223	19,074	363,823,195	3	11	2,662	5,422	446,801	457,645	428,341	476,105	404,460	499,987
33	40	478,530	452,223	26,307	692,049,931	3	11	2,662	5,422	446,801	457,645	428,341	476,105	404,460	499,987
34	40	476,106	452,223	23,883	570,389,596	3	11	2,662	5,422	446,801	457,645	428,341	476,105	404,460	499,987
35	40	492,500	452,223	40,277	1,622,240,851	3	11	2,662	5,422	446,801	457,645	428,341	476,105	404,460	499,987
36	42	470,830	474,924	(4,094)	9,572,722	5	28	3,246	6,612	467,311	480,536	450,042	497,805	426,160	521,687

Count	Degree Days X	Firm Sendout (Mcf) Y	Projected Linear Firm Sendout (Mcf) Y _{dc}	Difference Actual Versus Projected Y - Y _{dc}	Actual Versus Projected Squared (Y - Y _{dc}) ²	(Degree Days - Nm) X - Nm	(Degree Days - Nm) ² (X - Nm) ²	s _{dyc}	t*s _{dyc}	Lower Acc Lower	Upper Acc dc + t*s _{dyc}	"- 1 SD" Lower	"+ 1 SD" dc + 1*s _{dyc}	"- 2 SD" Lower	"+ 2 SD" dc + 2*s _{dyc}
37	12	531,367	173,924	57,443	3,299,711,529	5	28	3,246	6,612	467,311	480,536	450,012	497,805	426,160	521,687
38	13	442,637	184,774	(12,137)	1,775,513,306	6	39	3,675	7,487	477,287	492,260	460,892	508,656	437,010	532,537
39	13	507,618	184,774	22,844	521,857,716	6	39	3,675	7,487	477,287	492,260	460,892	508,656	437,010	532,537
40	13	506,677	184,774	21,903	479,727,687	6	39	3,675	7,487	477,287	492,260	460,892	508,656	437,010	532,537
41	13	522,827	184,774	38,053	1,438,038,418	6	39	3,675	7,487	477,287	492,260	460,892	508,656	437,010	532,537
42	14	170,991	195,621	(24,630)	606,612,146	7	53	4,161	8,475	487,149	504,099	471,742	519,506	447,861	543,388
43	15	514,527	506,474	8,053	64,851,567	8	69	4,684	9,541	496,933	516,015	482,593	530,356	458,711	554,238
44	15	501,681	506,474	(4,793)	22,942,283	8	69	4,684	9,541	496,933	516,015	482,593	530,356	458,711	554,238
45	18	521,017	539,025	(18,008)	324,288,110	11	127	6,389	13,013	526,012	552,038	515,143	562,907	491,261	586,788
46	18	531,550	539,025	(7,475)	55,878,681	11	127	6,389	13,013	526,012	552,038	515,143	562,907	491,261	586,788
47	50	541,487	560,725	(19,238)	370,101,190	13	176	7,586	15,452	545,273	576,177	536,844	584,607	512,962	608,489
48	50	551,528	560,725	(9,197)	84,582,356	13	176	7,586	15,452	545,273	576,177	536,844	584,607	512,962	608,489
49	51	539,136	571,576	(32,440)	1,052,330,177	14	204	8,195	16,692	554,883	588,268	547,694	595,457	523,812	619,339
50	51	570,115	571,576	(1,461)	2,136,728	14	204	8,195	16,692	554,883	588,268	547,694	595,457	523,812	619,339
			22,025,248												
Total Avg		37	407,875	193,308		28,516,901,962		1,674							

t = 2.04

Nm = 37

Population Standard Deviation of Regression Squared = 570,338,097

Population Standard Deviation of Regression = 23,882

Upper Range 1s 431,757
Lower Range 2s 383,993

Upper Range 2s 455,638
Lower Range 360,111

Standard error of sendout projection 24,374

T-factor 2.04

(T factor) * (Std error of projection) 49,649

Regression Results

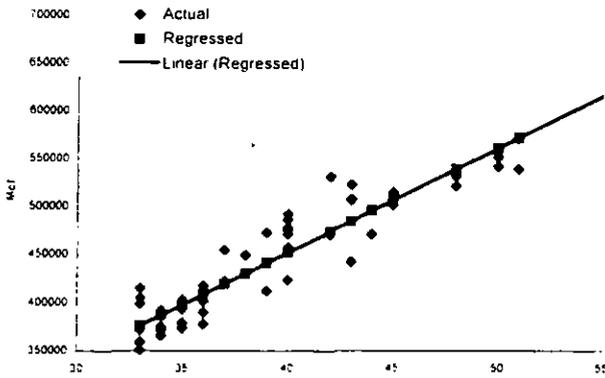
Winter 04-06

Based On Data for Daily Temperatures ≤ 32 Degrees Fahrenheit

Regression Output:		Quadratic		Cubic	
Regression Output		Regression Output		Regression Output	
Constant	18.215	Constant	(494.995)	Constant	15.309
Std Err of Y Est	24.374	Std Err of Y Est	22.897	Std Err of Y Est	23.126
R Squared	0.855	R Squared	0.875	R Squared	0.875
No. of Observations	50	No. of Observations	50	No. of Observations	50
Degrees of Freedom	48	Degrees of Freedom	47	Degrees of Freedom	46
N Coefficients	10.850	N Coefficients	36.390	N Coefficients	(1.377)
Std Err of Coef	644	Std Err of Coef	9.412	Std Err of Coef	140.173
					609
					-7
					3,411
					27

Regression Chart Analysis Based Upon Data For Temperatures Of <=32 Degrees F. Winter 04-06

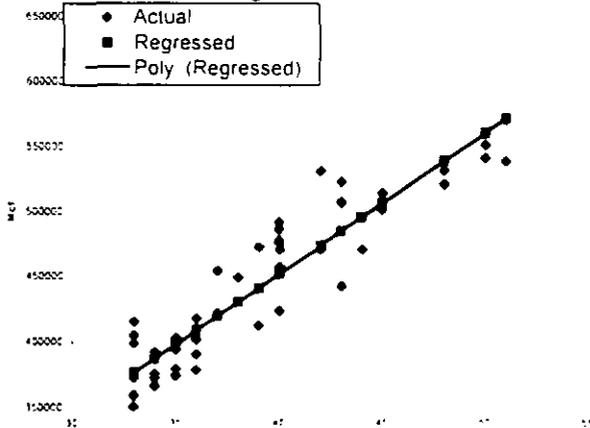
Linear Regression - Sendout



Linear Regression Output

Constant	18,215
Std. Error of Y Estimate	24,374
R Squared	0.855
Number of Observations	50
Degrees of Freedom	48
	X
X Coefficient	10,850
Std. Err. Of Coeffieicnt	644

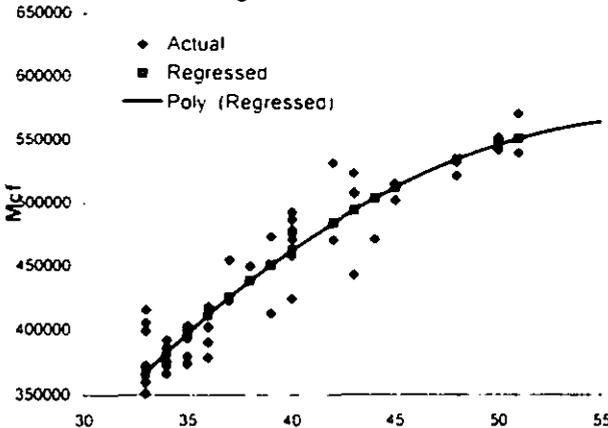
Quadratic Regression - Sendout



Quadratic Regression Output

Constant	(494,995)	
Std. Error of Y Estimate	22,897	
R Squared	0.875	
Number of Observations	50	
Degrees of Freedom	47	
	X	X ^ 2
X Coefficient	36,390	-312
Std. Err. Of Coeffieicnt	9,412	115

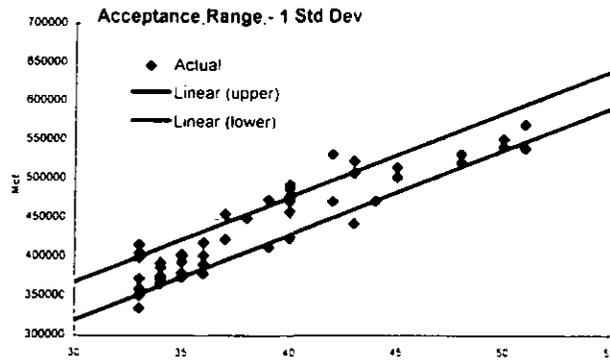
Cubic Regression - Sendout



Cubic Regression Output

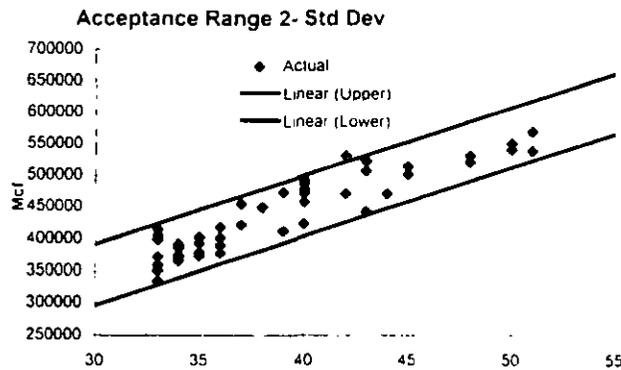
Constant	15,309		
Std. Error of Y Estimate	23,126		
R Squared	0.875		
Number of Observations	50		
Degrees of Freedom	46		
	X	X ^ 2	X ^ 3
X Coefficient	(1,377)	609	-7
Std. Err. Of Coeffieicnt	140,173	3,411	27

Regression Chart Analysis Based Upon Data For Temperatures Of <=32 Degrees F. Winter 04-06



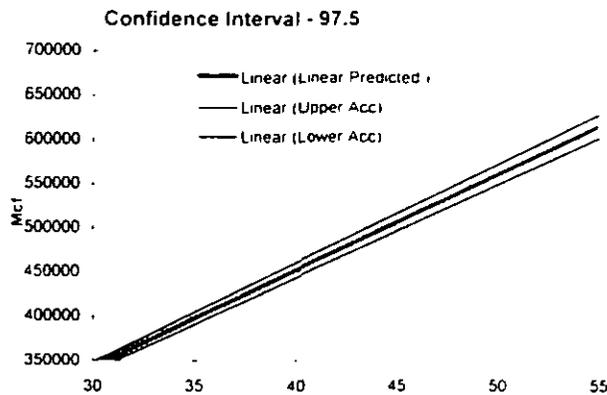
Acceptance Range @ 1 Standard Deviation

Regression Squared	570.338.097
Regression	23.882
Upper Range 1sd	464.387
Lower Range 1sd	416.623



Acceptance Range @ 2 Standard Deviation

Regression Squared	570.338.097
Regression	23.882
Upper Range 2sd	488.268
Lower Range 2sd	392.741



Confidence Interval: 97.5%

Regression Squared	570.338.097
Standard error of sendout projection	24.374
X Mean	39
T Distribution	2.04

Philadelphia Gas Works

Pennsylvania Public Utility Commission
52 Pa. Code §53.61, et seq.

Item 53.64(c) Thirty days prior to the filing of a tariff reflecting an increase or decrease in natural gas costs, each Section 1307(f) gas utility seeking recovery of purchased gas costs under that section shall provide notice to the public, under § 53.68 (relating to notice requirements), and shall file the following supporting information with the Commission, with a copy to the Consumer Advocate, Small Business Advocate and to intervenors upon request:

- (14) Analysis and data demonstrating, on an historic and projected future basis, the minimum gas entitlements needed to provide reliable and uninterrupted service to priority one customers during peak periods.

Response:

In 2006, PGW contracted with ICF International for a Natural Gas Supply Study. A copy of the August, 2006 report is attached.



PGW Natural Gas Supply Study

**Prepared for
Philadelphia Gas Works**



August 2006

Executive Summary

A. Overview of this Report

This report presents ICF International's (ICF) independent analysis of the Philadelphia Gas Works (PGW) gas supply asset portfolio. The objective of the study was to determine whether the current gas supply assets are appropriate for the level and type of gas demand in PGW's service territory. Gas assets consist of interstate pipeline capacity, natural gas storage, and liquefied natural gas (LNG) capability. These assets represent a significant portion of PGW's overall gas supply costs.

In 1997, ICF (then ICF Kaiser) undertook a similar study of PGW's gas supply strategy that covered many of the same issues addressed in this report. This report updates the earlier study by taking into consideration new developments in natural gas markets as well as PGW's customer mix.

B. Market Conditions and Changes since 1997.

Gas markets have changed significantly since the previous report prepared by ICF. In the 1997 study, gas prices were around \$2.20/MMBtu, today they are over \$7.00/MMBtu. Today's market is dominated by extreme volatility, with prices rising in some winter months to over \$15.00/MMBtu. Basis spreads – the difference in prices between two pricing points – have widened and also shown extreme volatility. Since the collapse of Enron and other major traders, gas supply has become more difficult to manage, and requires higher levels of sophistication.

The most dominant aspect of today's gas market is its volatility of prices. This has become a permanent fixture of the market. The import of this for local distribution company capacity planning is the role of storage in the gas asset portfolio. Where previously, the standard of measure for gas assets was whether they were sufficient (or were excess) for meeting peak season demands; the new standard must also include the optionality around storage. Storage can be a hedge against high gas prices and provide a cushion for managing volatility of prices. Thus managers can buy gas when prices are low, store it and either resell it later as off system sales or use it to meet system sendout.

Another benefit of storage is the ability to hedge against potential supply shortfalls. Until the hurricanes in the Gulf last year, this had not been recognized since the curtailments of the 1970s. This analysis incorporates volatility in gas prices and the implications for storage.

C. Analytical Approach

The analysis uses PGW's estimates of gas demand for both an average and a design year for 2006-2007 in its Purchased Gas Cost filing. ICF determines whether the gas supply assets are appropriate for these levels of demand. ICF used its Energy Asset Decision Support System (EADSS) as the principal tool for undertaking the analysis. The analytic approach has consisted of the following steps

1. Develop an estimate of daily gas demand. As noted above, we used PGW's forecasts. These were correlated with gas prices and randomized consistent with heating requirements to present a more robust picture of the volatility in gas consumption.

Our analysis focused on a single year, consistent with the previous analysis. Multiple years would have added more complexity without additional insight. PGW's forecast of gas demand growth is essentially flat.

2. Describe the mix of assets and the asset network. Assets consist of pipeline capacity, storage, and LNG.

Pipeline capacity is described in terms of contracted maximum daily quantity (MDQ). Costs are presented as capacity reservation costs (dollars per MMBtu of MDQ per month), usage charges (cost per MMBtu of gas shipped), and fuel use (a percent of flowing gas). In addition, we represent the receipt (where gas is put into the pipe) and delivery points (including both the PGW city gate and the storage facilities that can receive gas.)

Storage capacity is characterized by total cavern storage volume reserved by PGW (MMBtu), withdrawal MDQ, and injection MDQ. Costs for each component of the storage services are represented: cost of reserving storage capacity (\$/MMBtu), cost of reserving withdrawal capacity (\$/MMBtu of withdrawal capacity per month), injection costs (\$/MMBtu), and fuel costs, usually represented as a percent of withdrawal volume or injection volume or both. Most storage services have restrictions on when gas can be injected and when it can be withdrawn. These time periods are accounted for. Also, most storage services have volumetric "ratchets" that restrict the rate at which gas can be injected and withdrawn. These ratchets also are represented in the model. Finally, we note which pipelines feed the various storage services and which pipelines carry gas from the storage to the city gate.

LNG is represented much like storage. There is a maximum storage inventory capability and a minimum inventory (one cannot draw down LNG to zero – a certain amount must stay in the tank). There is a cost of liquefaction and a cost of vaporization, represented largely as fuel percentages, but also out-of-pocket expenses. *Fixed costs for the LNG system are considered sunk, and we do not include them in the analysis.*

Gas supply is represented as feeding the pipelines at various receipt point nodes. All of PGW's receipt points are gas pricing hubs or pricing points. Gas prices are represented for each of the receipt points as daily spot prices. PGW buys gas through a mix of first-of-the-month pricing contracts, some other forward price contacts, and spot purchases.

3. Implement the model to identify the least cost mix of gas supply assets. EADSS uses linear programming to identify the mix of assets that can meet the gas supply needs. The model is run under alternative sets of assumptions to identify the least cost mix of pipeline capacity, storage and LNG. As a linear program, the "objective function" is system-wide cost minimization. That is, EADSS finds the mix of assets that meet demand projections at the lowest cost to PGW and its customers. The latter point is important – when assessing least cost we also look at the costs borne by interruptible customers when they are interrupted and use fuel oil. (This in the current environment is more expensive than natural gas.)

D. Demand Estimation Review

ICF reviewed PGW's approach to estimating design day and design winter demand. PGW's asset mix is intended to meet system design conditions. PGW uses a range of inputs for estimating demand: historical demand trends by customer class, customer surveys,

statistical studies of weather responsiveness, end use studies and system operator experience. Domestic load is estimated from latest year customer load and thus reflects trends in energy efficiency. Normalized heating degree days are used for establishing base or average year conditions for the weather sensitive portion of the load. Design winter and design day estimates are then based on historic coldest winter weather and day type conditions.

We have found that PGW's approach is consistent with generally accepted approaches and remains the same as was analyzed in the previous study. PGW uses the coldest winter in the last 30 years to set its design winter conditions. ICF compared PGW's design winter to publicly available data on regional winter and find PGW's approach consistent. We do note that there appears to be a gradual warming trend such that the coldest winter was about 26 years ago. Using a 30 year time period is prudent however. Future design winter and design day estimations may be lower than the current estimate; but this is highly uncertain.

E. Supply Asset Analysis

Case Descriptions. ICF ran the EADSS model in a variety of cases and sensitivities to test how an optimized system would use the assets available to PGW. The following cases were run:

Reference Case. This is the design winter, with design peak day, and assumes full availability of all current pipeline, storage, and LNG.

Average Year Case. This uses average year demand/sendout to examine how the system would operate. This is the only case that runs on average year as opposed to design year sendout.

LNG Sensitivity Cases: We ran three of these to examine whether PGW should invest in new LNG liquefaction facilities.

LNG-1. This case limits liquefaction to the capabilities of the current expander system.

LNG-2. This case uses both the expander system and a new nitrogen based system to make LNG. It adds more storage capability

LNG 1 Bcf. This case assumes both LNG-1&2, but reserves 1 Bcf of storage for off-system sales.

Seasonal Price Variation Case. In this case we increased the cost of gas in the winter by \$0.75/MMBtu to test whether increased volatility would change the patterns of storage use.

Storage Sensitivity Cases. Our early runs identified those storage services that appeared to be marginal. We tested how the system would respond, and how costs would change if these storage services were eliminated. We tested them against the LNG 1 Bcf case. The two most relevant cases are

No Transco WSS. This storage service is eliminated

No Equitrans. This storage service is eliminated.

Pipeline Capacity. ICF compared pipeline utilization rates under both the Reference Case and the Average Year Case. In the reference case, Transo FT has the highest utilization of the year-round services at a 89% capacity factor. Tetco CDS has a 56% capacity factor; Tetco FT has a 53% capacity factor. All of the pipelines are fully utilized in January and

February, such that having transportation capacity available is important to the system. Average year utilization rates are somewhat less. Still all of the pipelines are fully utilized in at least one winter month. One of the key observations is the role of the Tetco FT released capacity – the PAID capacity which PGW can call on in winter months. The modeling found this to be a very useful and economic additional source of supply to meet winter demand. The analysis suggests that on average there is considerable opportunity to reduce costs through capacity release or off system sales using the excess capacity on these pipelines.

Storage Capacity. The storage analysis first looked at the storage service utilization under the Reference Case and the Average Year Case. In the Reference Case, the large storage services – Dominion, Tetco SS1, Transco GSS) are fully utilized. Most of the smaller storage services are also heavily used. The exception is WSS, which is only about 2/3 used. In an Average Year, storage utilization at Dominion and Tetco SS1 are reduced (as is Equitrans), but most of the storage services are still fully utilized. WSS storage is used at the same level under both cases.

When we ran our Seasonal Price Variation Case, to test the impact of greater volatility, all of the storage services were used at higher levels. In this case, WSS utilization approached current storage capacity levels.

Our further analysis focused on WSS and Equitrans. We inferred from the patterns of use that WSS has benefits related to trading and gas volatility. When we removed WSS from the available storage services, fixed storage costs declined (as WSS reservation costs were eliminated) but purchased gas costs increased. On net, removing WSS increased system costs, by about \$1.5 million. The same analysis was done for Equitrans. With the removal of Equitrans from available storage services, reservations costs fell, purchased gas costs increased, but on net, the system saved about \$400,000. This finding is less robust than the WSS finding, and would be sensitive to gas prices and volatility.

LNG. Our analysis of LNG focused on two issues. Whether expanding liquefaction benefited the system and whether reserving some of the LNG storage capacity for off system sales would impose additional costs. ICF reviewed alternatives to additional liquefaction: barging and trucking. Both would be expensive and would impose some delivery risks. Trucking would require more than 1,800 truck deliveries from distant locations. When looking at the liquefaction expansion, we treated the expander system as a sunk cost, but included the cost of a new system in the decision criteria. We found that adding more liquefaction would benefit the system by reducing interruption and creating savings in gas supply acquisition. Without expansion, PGW would have to curtail deliveries to LBS customers all winter in the design year. We also found that reserving 1 Bcf of LNG for off system sales would bring in revenues that offset costs and would benefit the system. When this was tested with eliminating some storage services at the same time, some increases in interruption occurred, but overall they appeared minor.

F. Conclusions and Recommendations

In assessing whether PGW has an adequate, or excessive, level of assets to meet its customer demand, ICF's approach considered both the design day/design winter levels of demand as well as the impact of volatility on asset deployment. Basing an analysis solely on design day deliverability presents an incomplete picture. In general we found that PGW's approach to estimating design day and design winter sendout is reasonable for capacity planning purposes.

PGW fully uses its pipeline capacity during winter seasons. There are opportunities to engage in capacity release and off system sales to generate revenues to offset costs which we would encourage. ICF does not recommend any turn back or permanent release of pipeline capacity.

Storage capacity is adequate to meet peak day and winter demand. Equitrans storage (and its related pipeline capacity) should be examined more closely as it appears that it could be eliminated and generate savings. The savings under the conditions we analyzed are not that large, hence we recommend further study of this option. Transco WSS storage, however, generates substantial benefits for the system based on price volatility and supply security. WSS allows PGW to optimize gas purchases and store gas in the event of supply shortfalls. Combined with the pipeline capacity, WSS creates strong trading opportunities.

We strongly recommend that PGW should expand its liquefaction capabilities once the cascade system is phased out. More LNG storage enhances the value of PGW's other assets by creating optionality. There are solid opportunities for using LNG to create off system sales opportunities that can benefit the system and its customers.

Outline

- Introduction
- Market Context
- Design Winter and Day Analysis
- Supply Analysis and Issues
- Conclusions and Recommendations

Purpose of the Study

- Update ICF's 1997 supply analysis
- Review design and peak day estimation methodologies
 - Evaluate whether the current methodology is reasonable and yields reasonable results.
- Analyze the use of pipeline and storage capacity
 - Apply an analytic framework that can address whether PGW has the appropriate levels of gas pipeline capacity, storage, and LNG
- Evaluate the effect of expanding LNG liquefaction capabilities
 - Address the question whether expanding liquefaction capabilities with lower cost technology creates benefits for the system
- Develop recommendations for optimal allocation of gas supply assets

Analytic Approach

- ▣ Focus has been on the use of pipeline capacity, storage and LNG facilities, not on gas purchasing activities
- ▣ Reviewed both average year and design year demand characteristics
- ▣ Design year and design day estimations were examined for reasonableness
- ▣ Modeled asset usage with Energy Asset Decision Support System
 - Stochastic optimization
 - Useful for asset decision making under conditions of uncertainty
 - Gas and oil prices
 - Demand patterns
- ▣ Optimal solution identifies the least cost mix of assets

Key Questions Addressed



- Is PGW's approach to estimating Design Day and Design Winter demand reasonable?
- Does PGW have the correct amount of gas pipeline capacity?
- Does PGW have the correct mix and amount of gas storage capacity?
- Would expanding the liquefaction capabilities at the Richmond plant have a benefit to PGW?
- Does the asset mix allow PGW to benefit from releasing capacity and making off system sales?

Outline

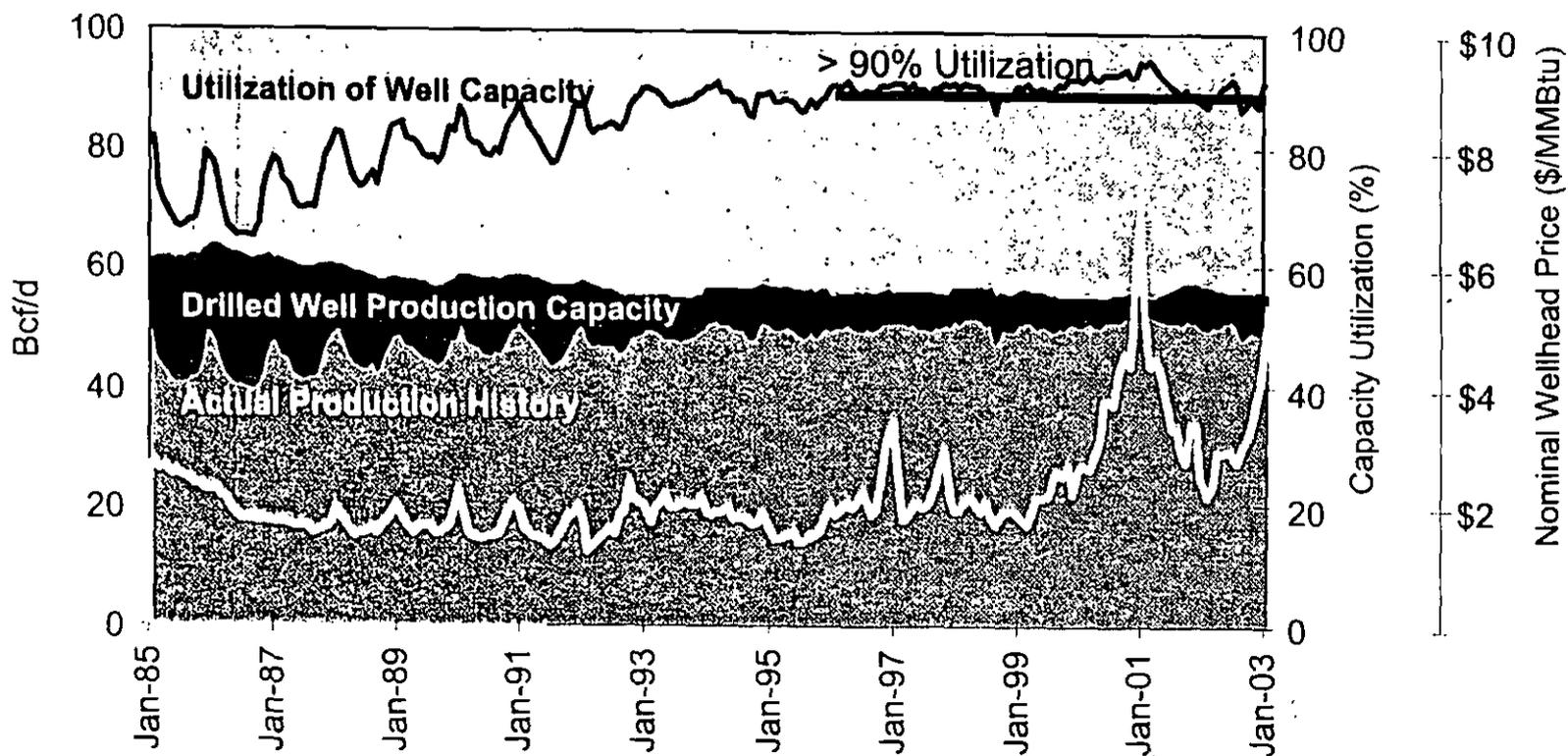


- Introduction
- Market Context
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Planning in Today's Market Context

- The market context for PGW today is very different from the 1997 study.
 - Gas prices have tripled: our average price in 1997 was about \$2.20/MMBtu, today it has averaged over \$6.00/MMBtu
 - Volatility of gas prices has increased
 - Basis spreads have widened and shown substantial volatility
 - Sophistication in gas market risk management has grown
 - - Capacity release
 - - Off system sales
 - Financial hedges
 - Growing interest in imported LNG

Tight U.S. Supply has Created Volatility



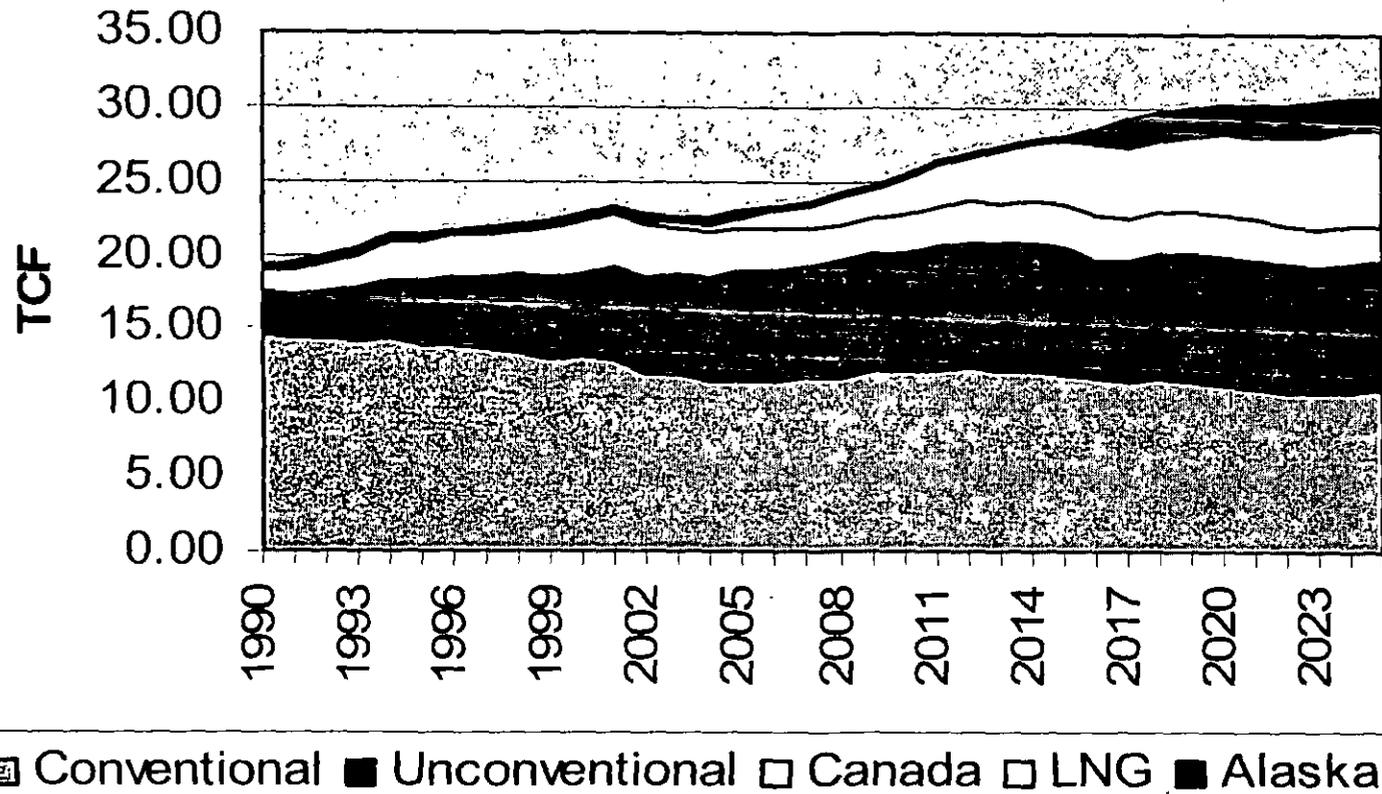
Source: Energy Information Administration

Passion. Expertise. Results.

Volatility is Permanent and is a Major Factor in Capacity Decision-Making

- By 1985, seven years after the Natural Gas Policy Act of 1978, the supply incentives had created a surplus of production capacity: 60 Bcf/d with demand running about 45 Bcf/d.
- Wellhead production met much of seasonal demand, hence gas prices stayed low in the late 80s and 90s. Well utilization rates were in the 70% range.
- As the surplus was worked off (aided by FERC Orders 436, 500 and finally 636), utilization rates crept to over the 90% level. As this happened, gas prices began exhibiting volatility.
- The outlook is that volatility is a permanent fixture of our gas system. Tight natural gas supplies relative to demand leads to swings in prices needed to adjust supply to swings in demand.

LNG Grows to 21% of U.S. Supply



Source: Energy Information Administration, Annual Energy Outlook, 2005

Passion. Expertise. Results.

Conventional Gas Production is being Offset by Imports and Unconventional Sources

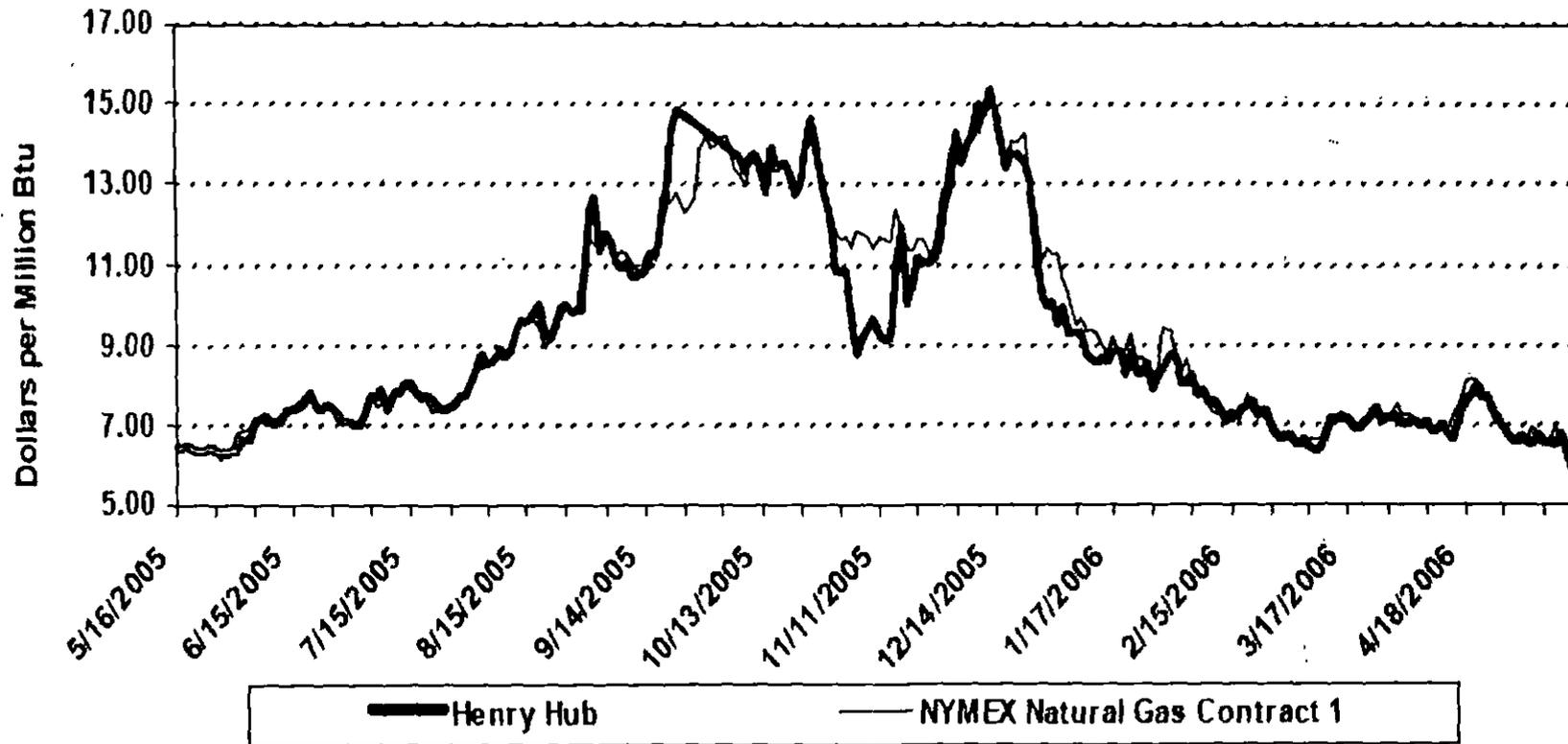


- ▣ Conventional production is in a long term decline
- ▣ Canadian imports have grown since 1990 but are beginning to level off.
- ▣ Major new sources are unconventional and LNG
- ▣ Alaska gas is expected in the post 2015 time frame

Gas Prices Have Declined from the Hurricane Hump – but Remain High Historically



Spot and Futures Prices for Natural Gas



Passion. Expertise. Results.

Hurricane Impact on Gas Prices Reflects Market Sensitivity to Supply Disruption

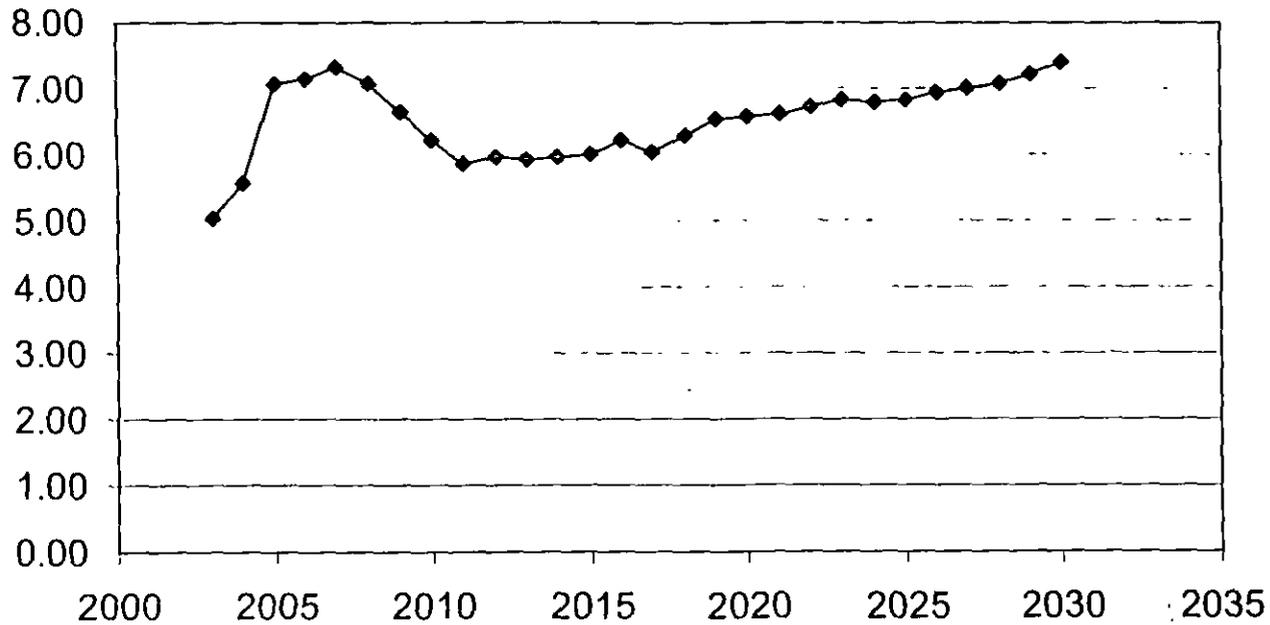


- The hurricanes in the Gulf in 2005 reduced domestic production of gas by 40%. Gas prices responded.
- Unlike the oil industry where the oil price spike was short-lived, the Hurricane hump lasted much of the winter.
 - Oil markets responded globally: more oil was diverted to U.S. markets in response to prices alleviating the price impact
 - The U.S. is still not integrated into world gas markets so no such relief was available – we were on our own.
- As LNG becomes a larger share of the market, such events' effects may be more manageable.
- Nevertheless, volatility will remain a characteristic of the market.

ICF Reference Case Gas Price Forecast does not Anticipate Continued High Prices



Henry Hub (2003\$/MMBtu)



Passion. Expertise. Results.

Long Term, Gas Prices will Decline from Recent Levels but will Recover



- Supply and demand responses to high gas prices will cause prices to fall through about 2010, on an annual basis.
 - Seasonal swings in prices and volatility will nevertheless dominate short term pricing monthly.
- Conventional gas (that is gas developed by conventional gas wells) will continue to decline.
- This will be offset by more gas production from unconventional settings and LNG.
 - Unconventional gas – coal bed methane, deep offshore, deep tight sands, shale – is more costly to produce
 - LNG will become a major supply source, approximately 14 Bcf/d by 2025, but will not be enough to set the price – which will be determined by unconventional resources
 - Most LNG will come through Gulf terminals to use existing pipeline capacity
- Major influencers of future gas prices are power demand growth and the availability of LNG

Significance of Volatility and Supply Uncertainty



- ▣ Volatility makes the ability to store gas more critical and causes the value of storage to increase
 - Managing the swings in gas prices is possible only if one can store gas when the price is low
 - Volatility creates “optionality” value for storage and increases the ability to trade around storage assets
- ▣ Supply uncertainty also enhances the value of storage
 - Hurricanes in the Gulf will disrupt production and LNG deliveries
- ▣ Storage provides a hedge for price and delivery uncertainty in addition to peak day and seasonal deliverability
- ▣ Participation in secondary markets through capacity release and off system sales is enhanced by holding assets in volatile markets

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Outline



- Introduction
- Market Context
- Design Winter and Day Analysis
- Supply Analysis and Issues
- Conclusions and Recommendations

Purpose of Demand Estimation Review



- ▣ Design day and winter parameters drive investment decisions and asset allocations
 - Pipeline capacity
 - Storage capacity and utilization
 - LNG storage and vaporization
- ▣ Design parameters in turn impact system costs
 - Capacity payments
 - Inventory holding costs
- ▣ ICF used design day and design winter estimates to determine the appropriate gas asset mix

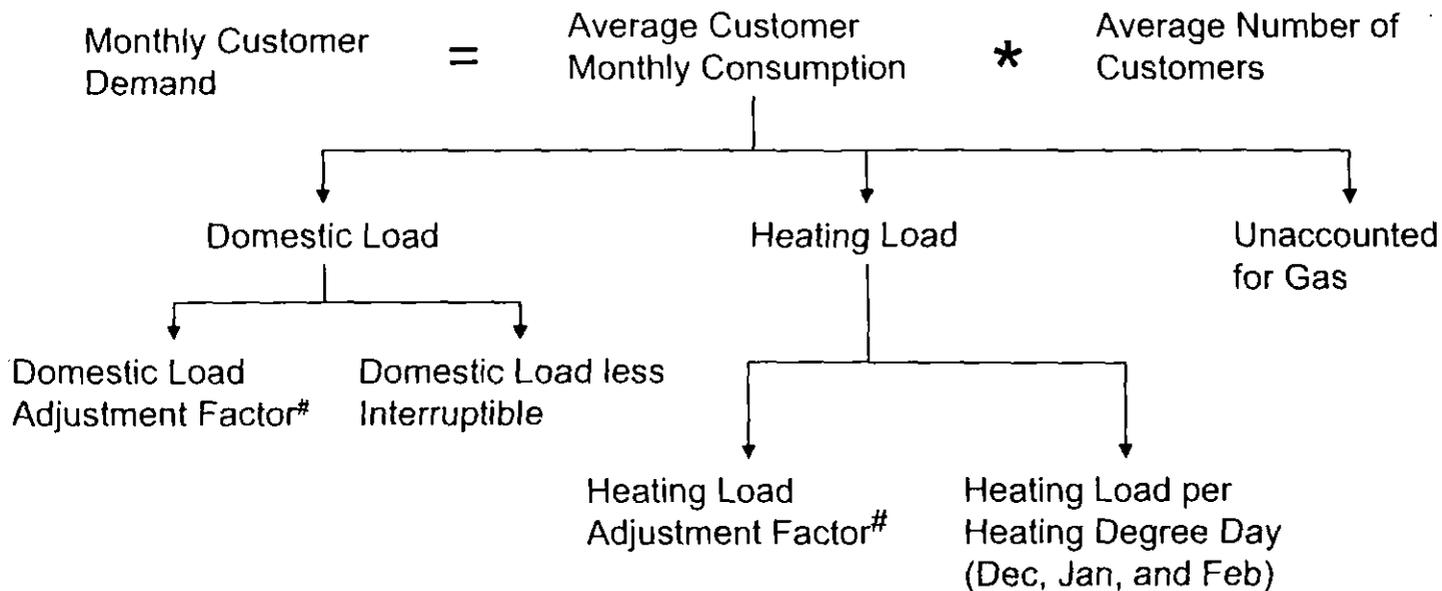
PGW's Approach to Estimating Demand



- ▣ PGW uses a combination of inputs into demand estimation
 - Historical demand trends for each customer class
 - Customer surveys
 - End use studies – appliance characteristics
 - Judgment of system operators
- ▣ Demand is related to temperature through heating degree days (HDD)
- ▣ Capacity planning focuses on the “Design Winter” and “Design Day”
 - These are concepts of peak demand that define the largest amount of gas that PGW must be able to deliver to meet system requirements and maintain system integrity
 - These represent statistically derived historical system peak limits

PGW Demand Estimation Methodology

Overview



#Adjustment Factors account for error in estimation of demand in previous year

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PGW Demand Estimation Methodology Evaluation



- ▣ Domestic Load is estimated by using latest year customer load thus accounting for improvements in energy efficiency of customer appliances
- ▣ Heating Load Adjustment Factor is estimated using normalized Heating Degree Days thus representing only error in estimation methodology
- ▣ Design Day demand estimated using firm load thus making the forecasting regression methodology robust
- ▣ Design Day demand estimated using four year peak day heating degree days allowing for a good fit

Philadelphia Winter Heating Degree Days



Data Set (1976-2005)	Nov	Dec	Jan	Feb	Mar	Winter Season
Historical Mean Degree Days	533	862	1,028	844	671	3,938 ^b
Historical Peak Degree Days	762	1,219	1,400	1,183	911	4,535 ^b
No. of Sample Observations	30	30	30	30	30	30
Sample Standard Deviation	95	144	162	129	99	213
Data Relative to Mean ^a (%)	18	17	16	15	15	5 ^b
PGW's Design Degree Days	608	1,005	1,191	973	778	4,555

Notes:

^a It is coefficient of variation, calculated as (sample standard deviation/sample mean)*100.

^b Individual months do not add up to this total, because it has been calculated independently using the historical winter season data or the standard deviation for the season total.

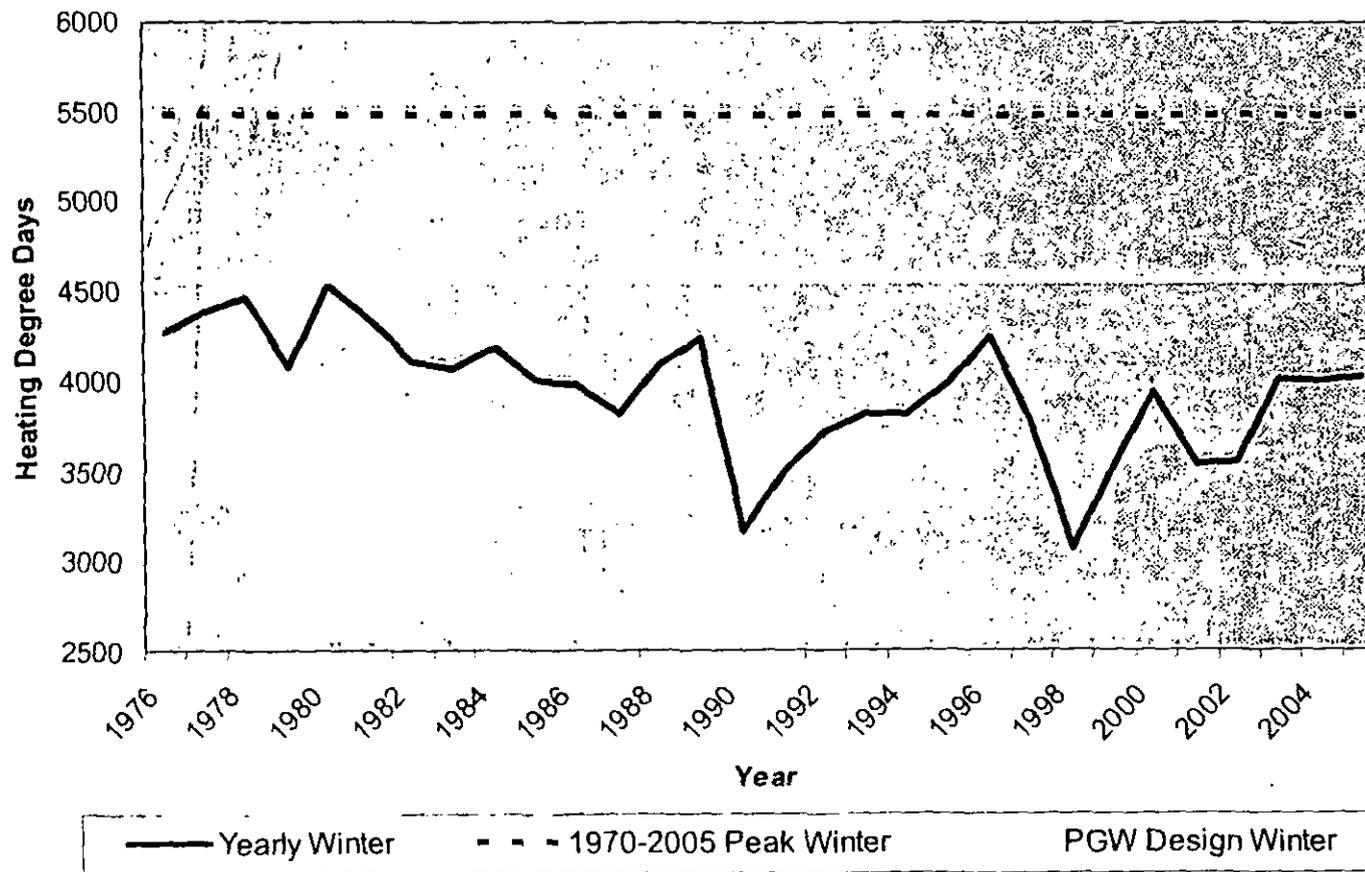
PGW Design Degree Days are higher than NOAA estimate because of the location and frequency of measurements. PGW measures several times per day at the Richmond Plant. NOAA uses a simple average of the high and low temperatures.

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PGW Design Winter Heating Degree Days



Philadelphia Winter Heating Degree Days



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PGW's Design Year Estimates



- The previous slide compares the design winter based on coldest winter in 30 years with historical winter weather and the theoretically coldest winter, measured in heating degree days (HDDs).
- Recent winters have been warmer than in the 1980s, and the trend suggests warming.
- PGW's design winter is still substantially below the theoretical coldest winter
 - ◆ Theoretical coldest winter includes the coldest winter months picked from the last 30 years and assumes each month is the thirty year cold month

Findings on Peak and Winter Demand

- PGW's approach remains essentially the same as was reviewed in the previous study.
- PGW's approach yields a forecast of design day and design winter that are reasonable estimations.
 - The design conditions are below "theoretical" worst case (which could yield higher than necessary investments)
 - The probability of meeting design winter conditions remains approximately once in every 16 years.
- PGW's approach incorporates recent trends in local markets towards more efficient equipment and demand response to prices.
- Potential for demand growth is modest (given local and national trends).

ICF's Approach to Estimating Design Winter Sendout



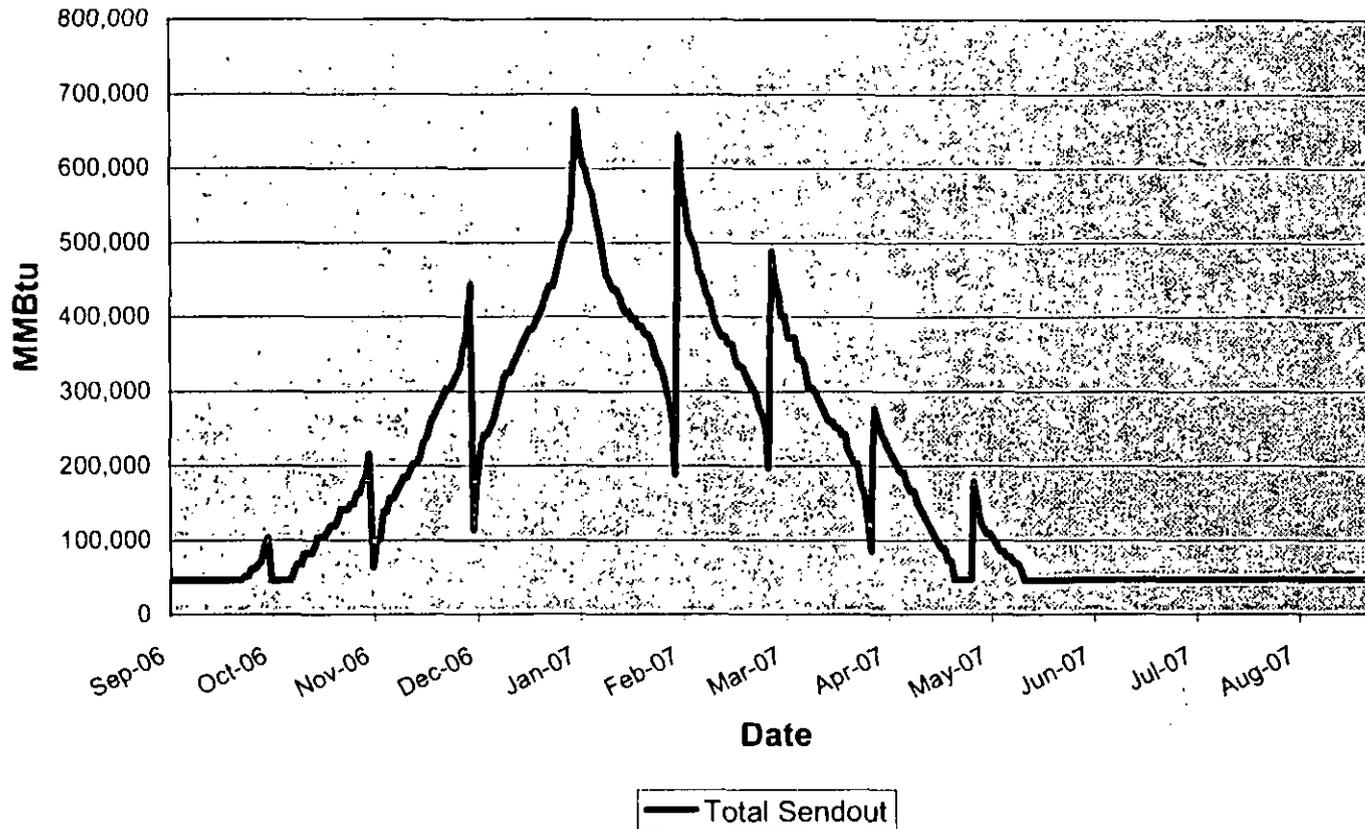
- First step is to use design winter parameters for 2006-2007 provided by PGW for its PGC filings with the Philadelphia Gas Commission.
 - These data are from September through August and in the form of load duration curves for each month.
- Data were converted to April through March and randomized to reflect typical random weather and gas pricing patterns.
 - Converting data for April through March makes modeling storage easier
 - Gas sendout and prices are correlated
- Design and average years were differentiated.
 - All the analysis is based on daily, sequential sendout
 - Average and design years differ only in winter sendout

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Design Year Sendout for Planning – Sept. 1 to August 31



Design Year Sendout

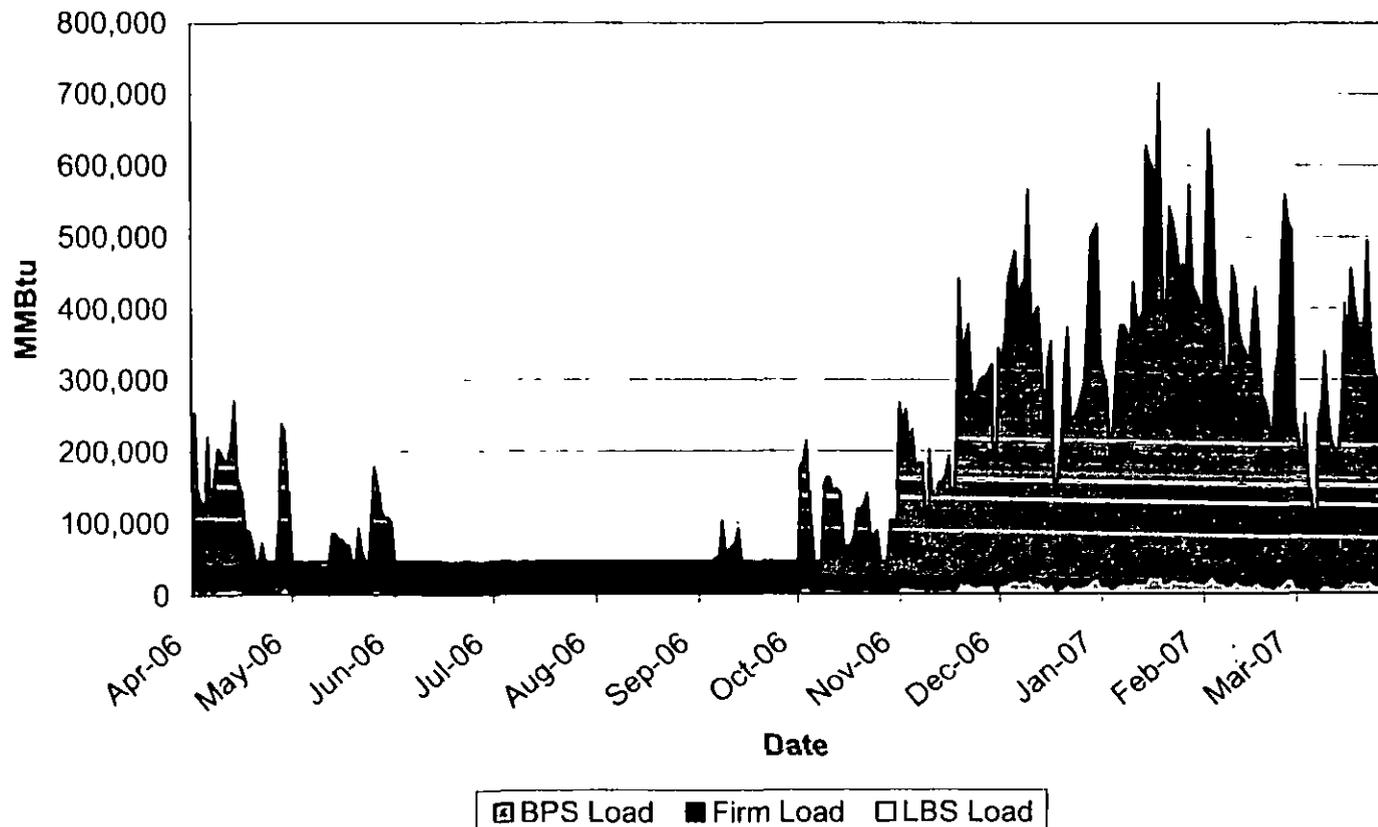


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Sendout Reordered and Randomized – April 1 to March 31



PGW Reference Case Sendout

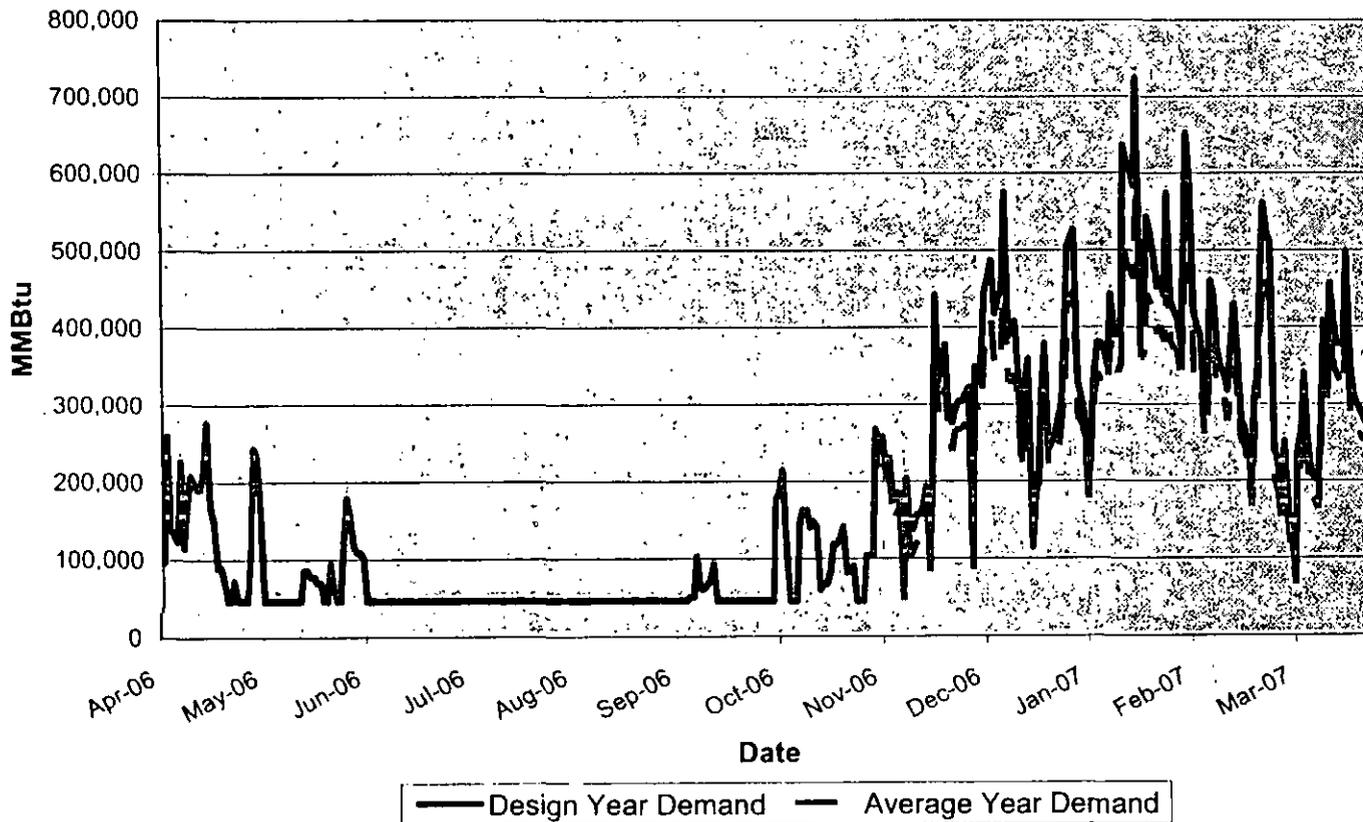


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Demand Patterns Modeled Consistent with Gas Prices



Design and Average Year Total Demand

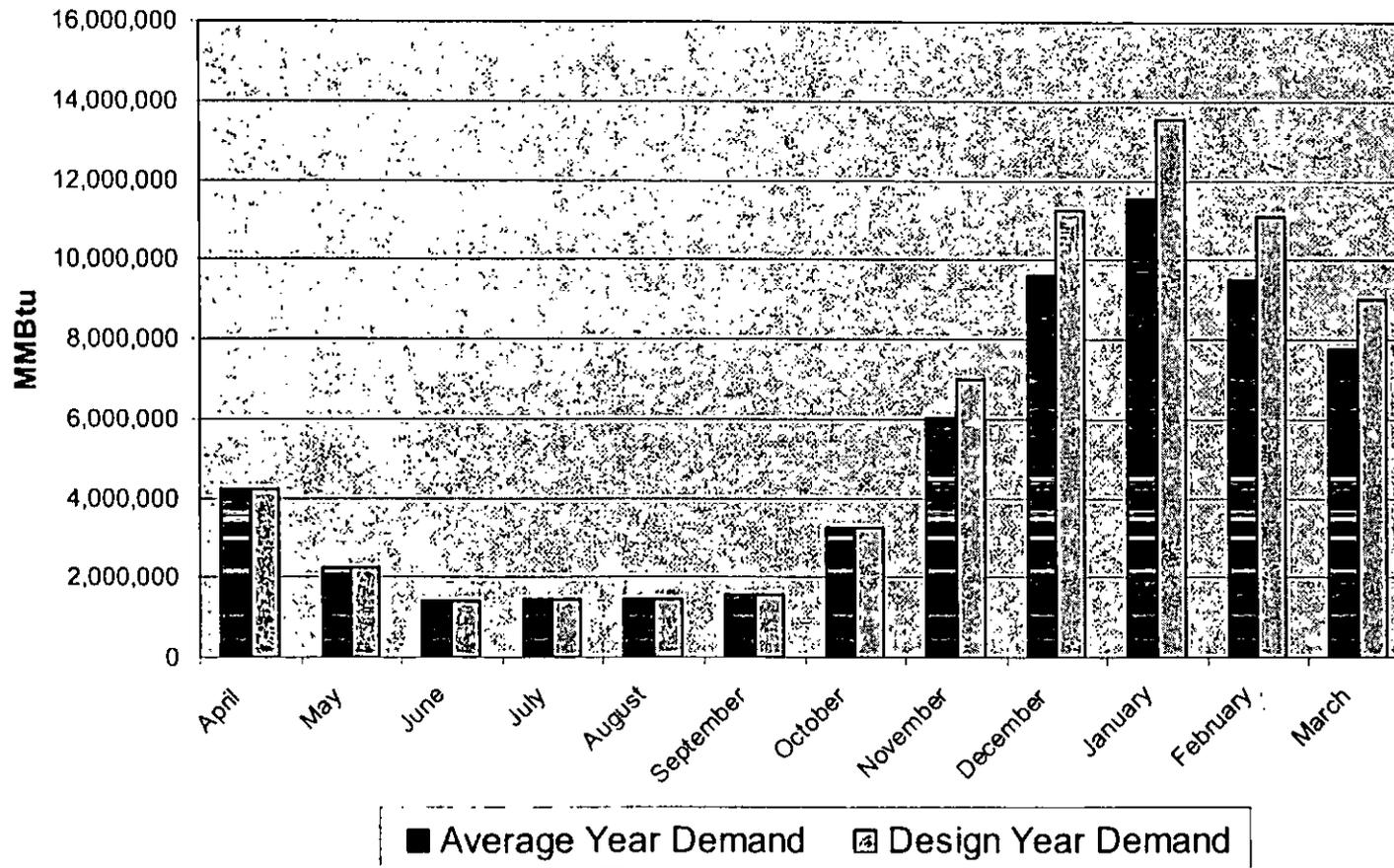


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Design and Average Winter Demand -- Simplified



Design and Average Year Total Demand



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Outline



- Introduction
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Analytic Approach



- Use sequential optimization to identify the least cost mix of assets when there is volatility in gas demand, prices, and storage operations
 - Traditional approaches (and what was used in 1997) employ load duration curve that are useful for optimizing pipeline capacity and gas contracts.
 - Representing demand sequentially rather than as a load duration curve captures the inter-temporal aspects of gas storage optimization and effects of price volatility
- Key inputs include
 - Sendout and sendout variability – load represented on daily basis
 - Supply system topology and options
 - Gas and oil prices and price volatility
- Once these are implemented, we model the system under different conditions
 - Design year v. average year
 - With different supply options available or not
 - With different gas price patterns

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Analytic Approach (contd.)



- Demand inputs
 - ICF used PGW's own forecasts of gas demand for average and design year from the 2006 PGC filing (June 2006)
 - Used a single year rather than multiple years or future year forecasts to simplify the analysis
- Supply topology inputs
 - Gas pipelines – capacity (MDQ), receipt/delivery points, costs, fuel, storage interconnections
 - Gas storage – capacity, injection/withdrawal MDQs, withdrawal ratchets, costs, fuel, pipeline interconnections
 - LNG – liquefaction capacity and rates of liquefaction, storage capacity, vaporization capability, liquefaction expansion potential, costs.

Analytic Approach (contd.)



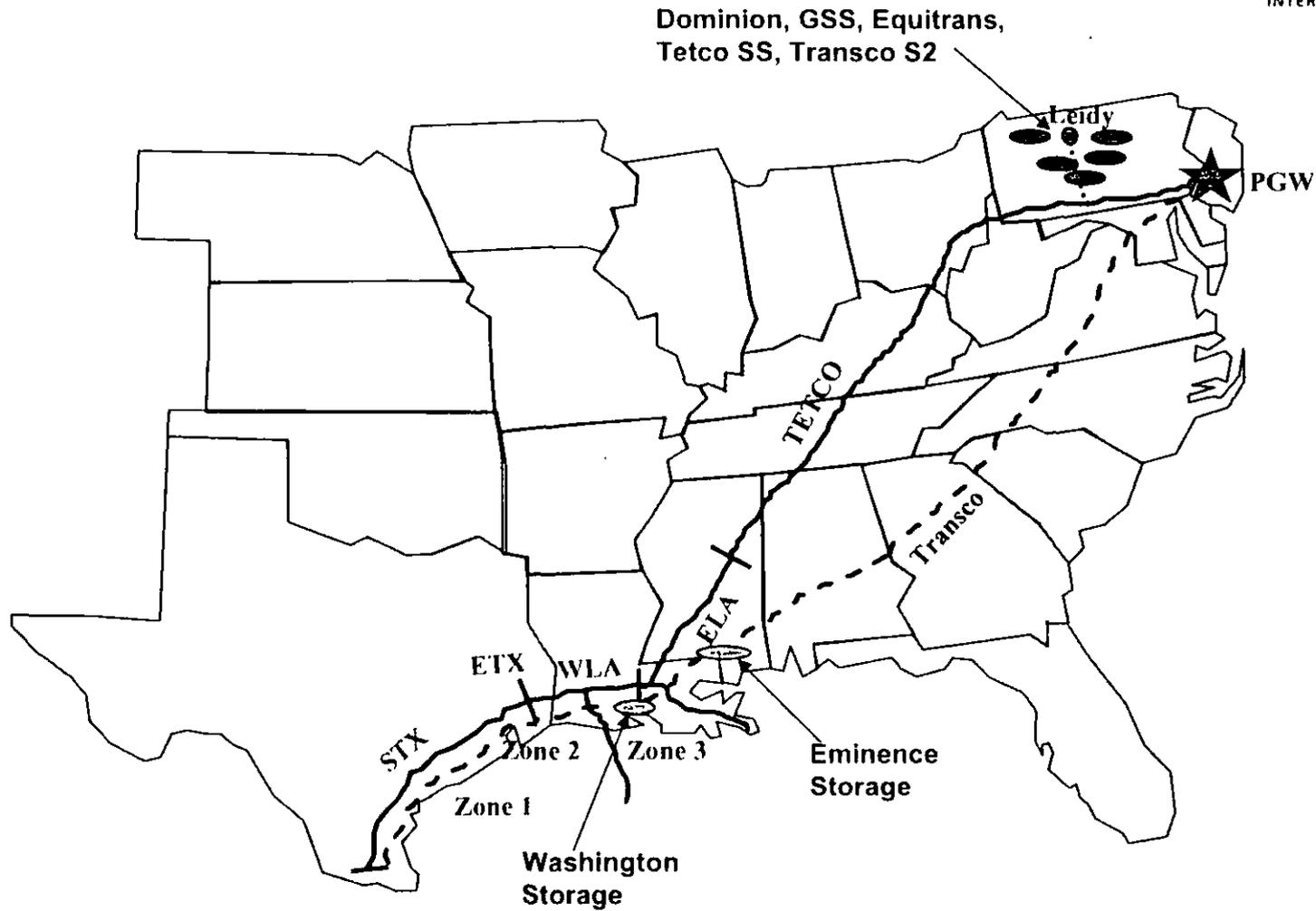
- Gas pricing inputs
 - Used recent history gas prices and volatility
 - Deployed assumptions about first of month purchasing and spot purchasing practices – PGW sets up 64% of winter supply in firm, first of the month contracts, with spot supply meeting swing demand
 - Prices are represented for supply at each of the pipeline receipt points based on historic basis differentials

Analytic Approach -- Sensitivities



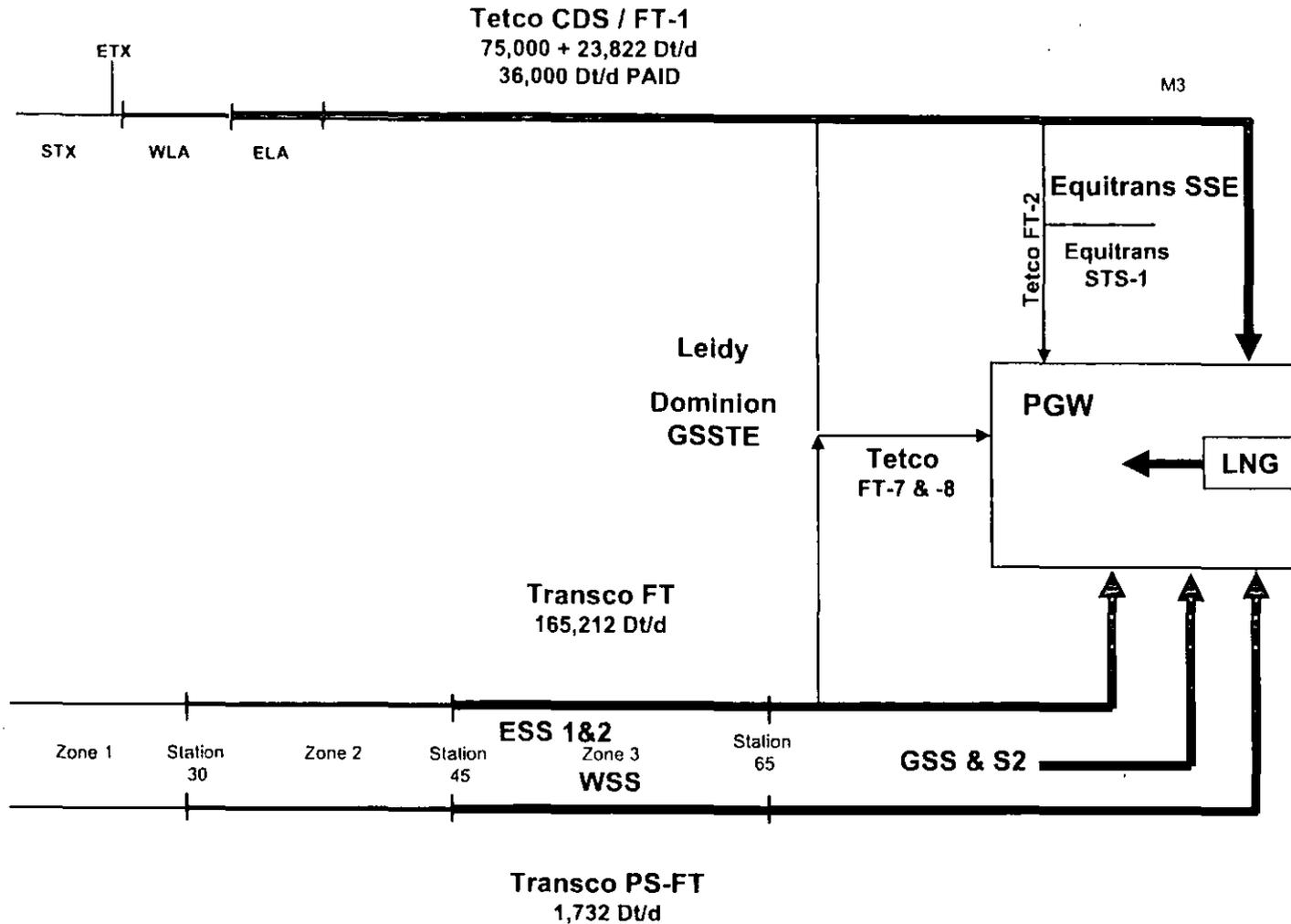
- Sensitivity analyses were undertaken to identify the least cost mix of assets and their utilization.
 - Sensitivities were examined under the design year reference case
 - An average year case was run to examine the potential for capacity release and off-system sales
- Major sensitivities tested various supply asset options
 - Availability of more LNG by expanding LNG liquefaction capacity
 - Reduction in storage capacity by alternately eliminating various storage services
 - Eminence
 - Equitrans
 - WSS
 - Transco S2
 - Demand for storage with larger summer/winter gas price swings

Supply Pipelines and Storage



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Supply Topology



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Case Descriptions



- Reference case: Design winter, design peak day, assumes full LNG liquefaction capability is available (LNG 1 and LNG2)
 - LNG-1 case limits liquefaction capability to the current expander system
 - LNG-2 case allows a new system to be built (replacing the current cascade system, which is highly maintenance intensive and has reached the end of its useful life at 37 years)
- Average case: Average year sendout, also with full liquefaction capability
- LNG-1 case: Design winter, no expansion of LNG liquefaction
- LNG 1 Bcf case: Design winter, LNG expansion occurs, but 1 Bcf of storage is reserved for off system sales and is not available to PGW
- Storage sensitivity cases: LNG 1 Bcf case, with alternative storage services not available
 - Focused on storage services that appear in earlier cases to be on the margin

Findings – Pipeline Capacity

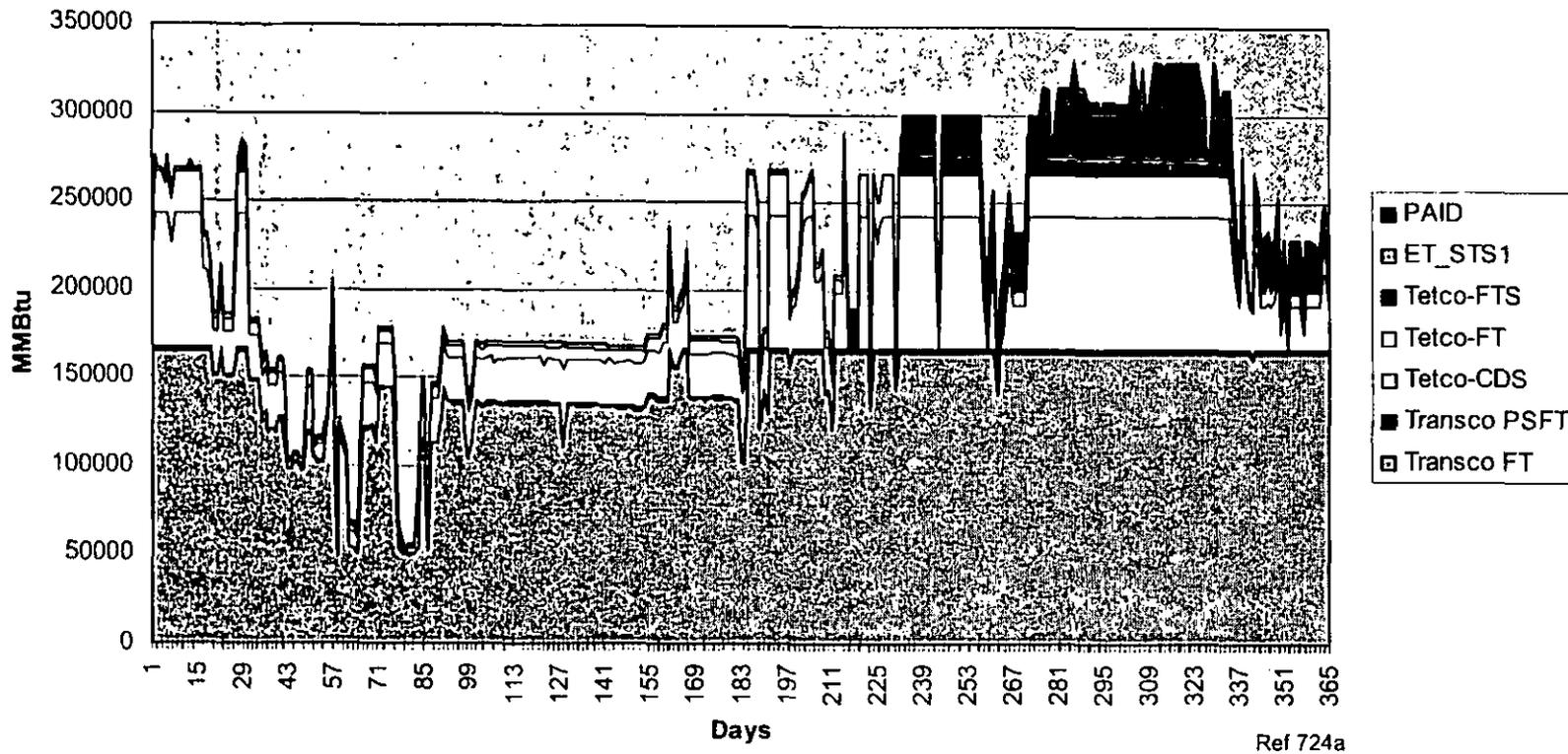


- ▣ Both long haul pipelines are necessary to meet full requirements in winter
- ▣ Transco appears to be the lowest cost and most valuable pipeline asset
 - Under design conditions, the pipeline should operate at a 89% load factor
 - This drops to about 84% during an average year
- ▣ Tetco operates at lower load factors
 - Design year: 56%
 - Average year: 46%
 - Nevertheless Tetco reaches its full capacity on some days for six months of the year even in average winter conditions
- ▣ PAID call released capacity is critical in winter

Pipeline Utilization Highlights Key Segments



Pipeline Dispatch

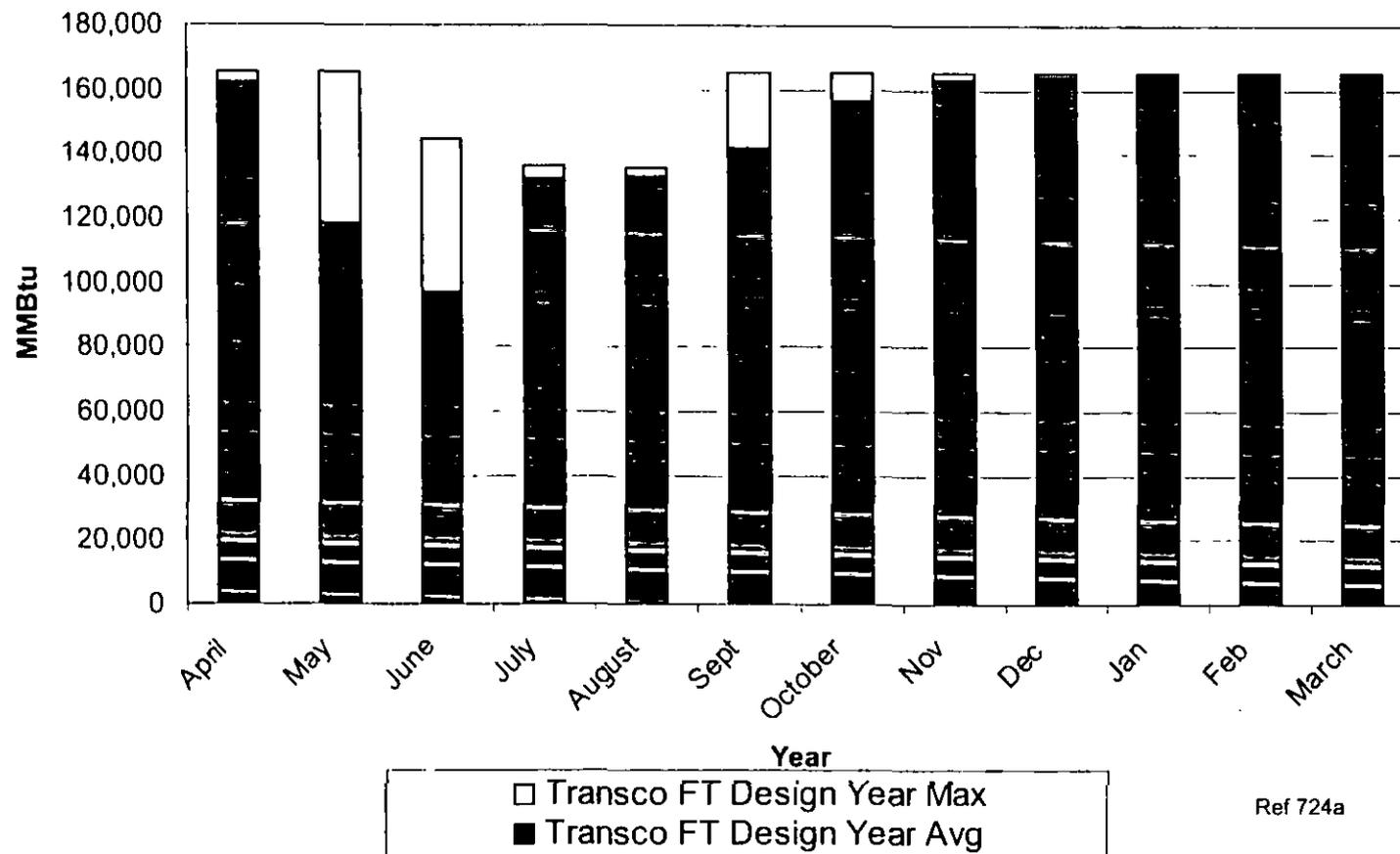


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Transco FT Reference Case Utilization is 89%



TRANSCO FT PIPELINE CAPACITY UTILIZATION

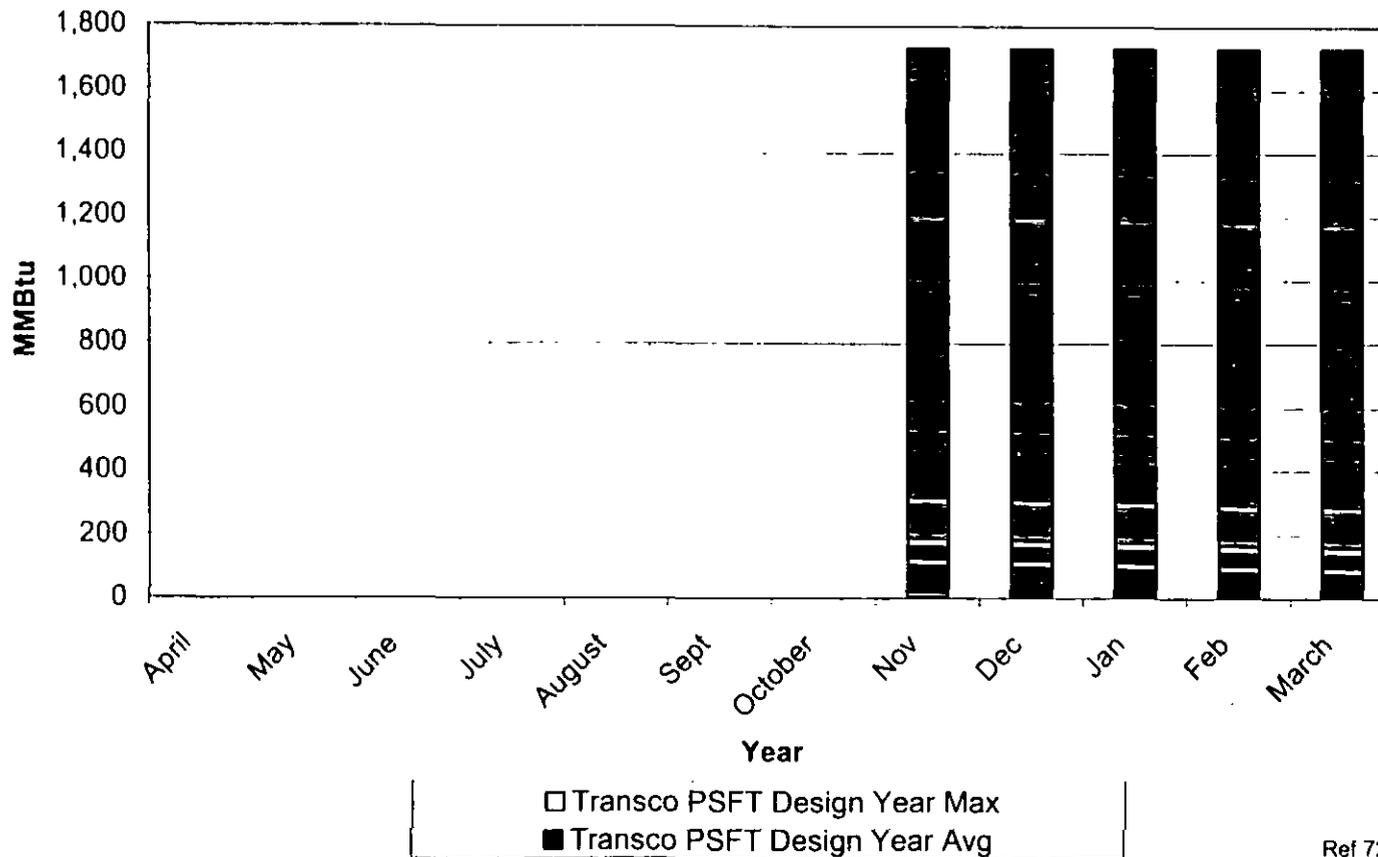


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Transco PSFT Reference Case Utilization is 100% in Winter



TRANSCO PS-FT PIPELINE CAPACITY UTILIZATION



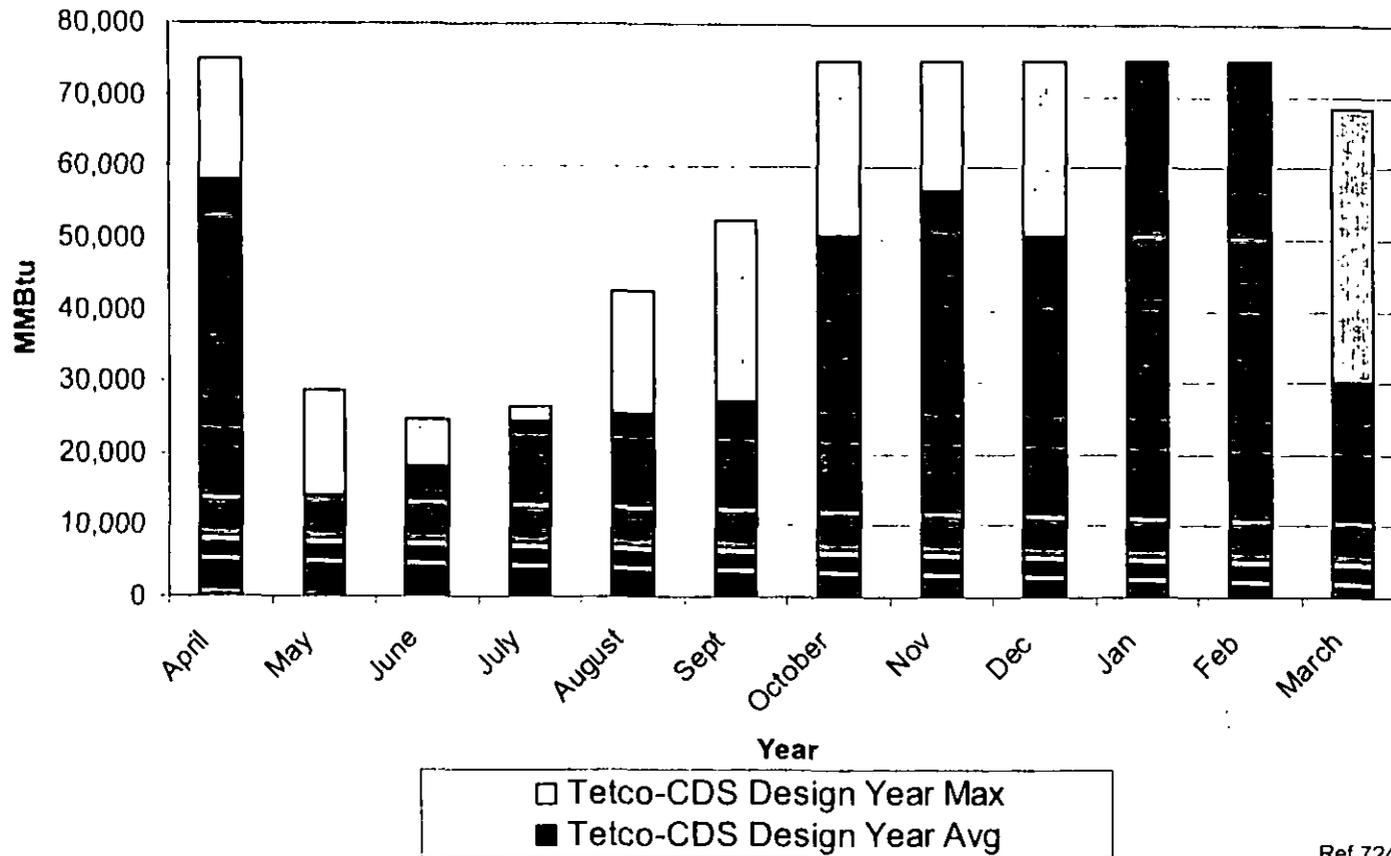
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Tetco CDS Reference Case Utilization is 56%



TETCO CDS PIPELINE CAPACITY UTILIZATION



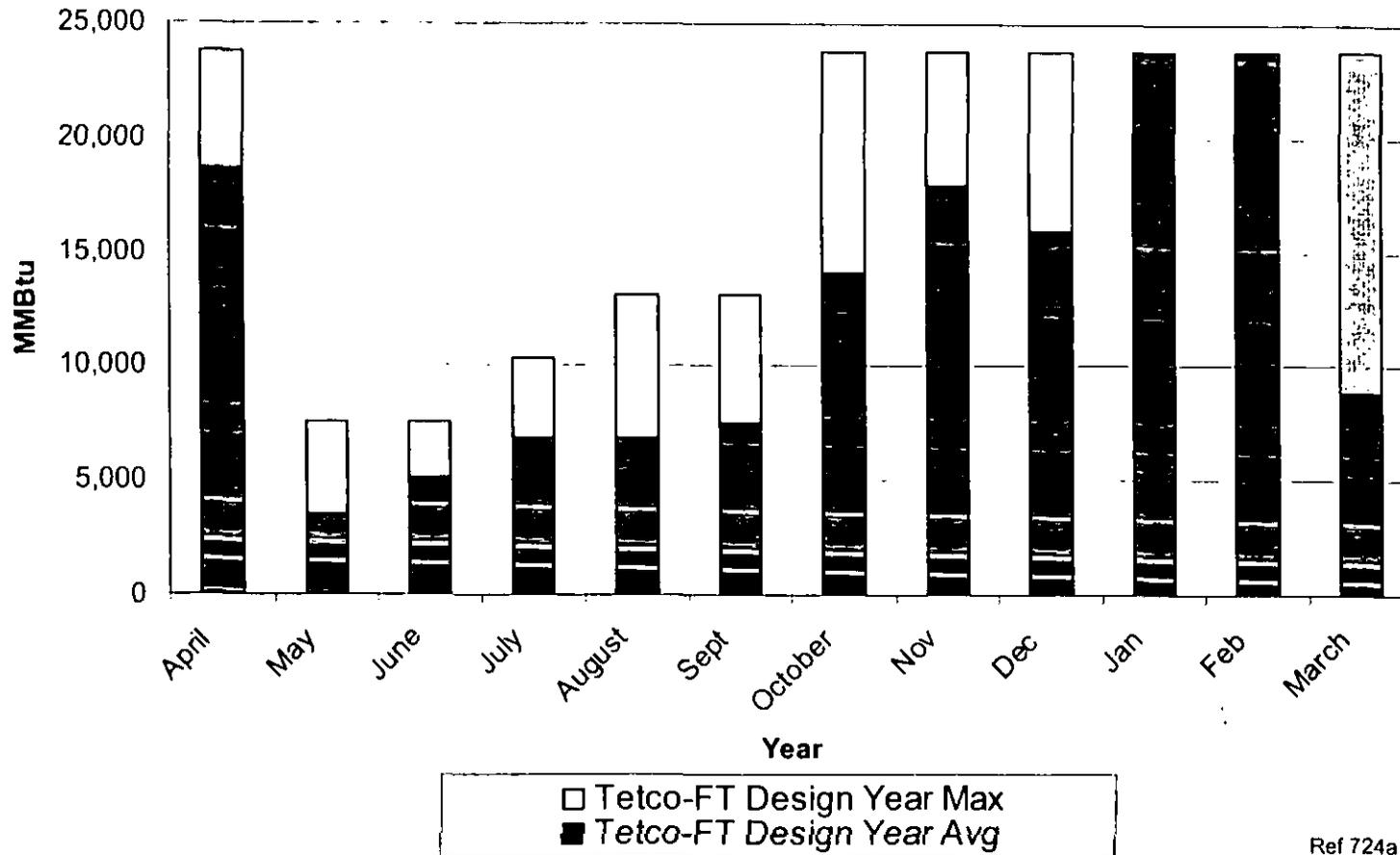
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Tetco FT Reference Case Utilization is 53%



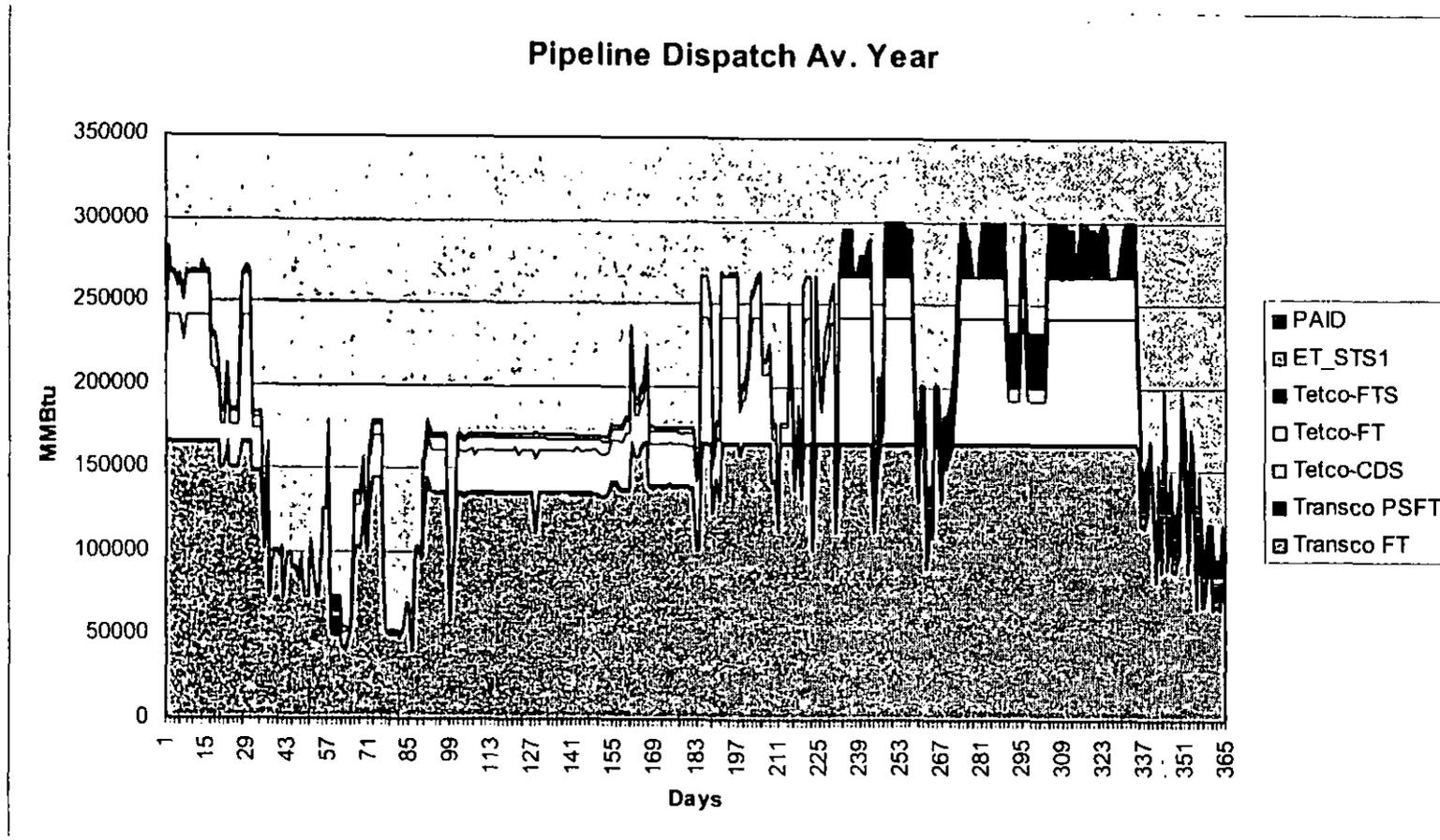
TETCO FT PIPELINE CAPACITY UTILIZATION



Ref 724a

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PAID Capacity not Used in Average Year



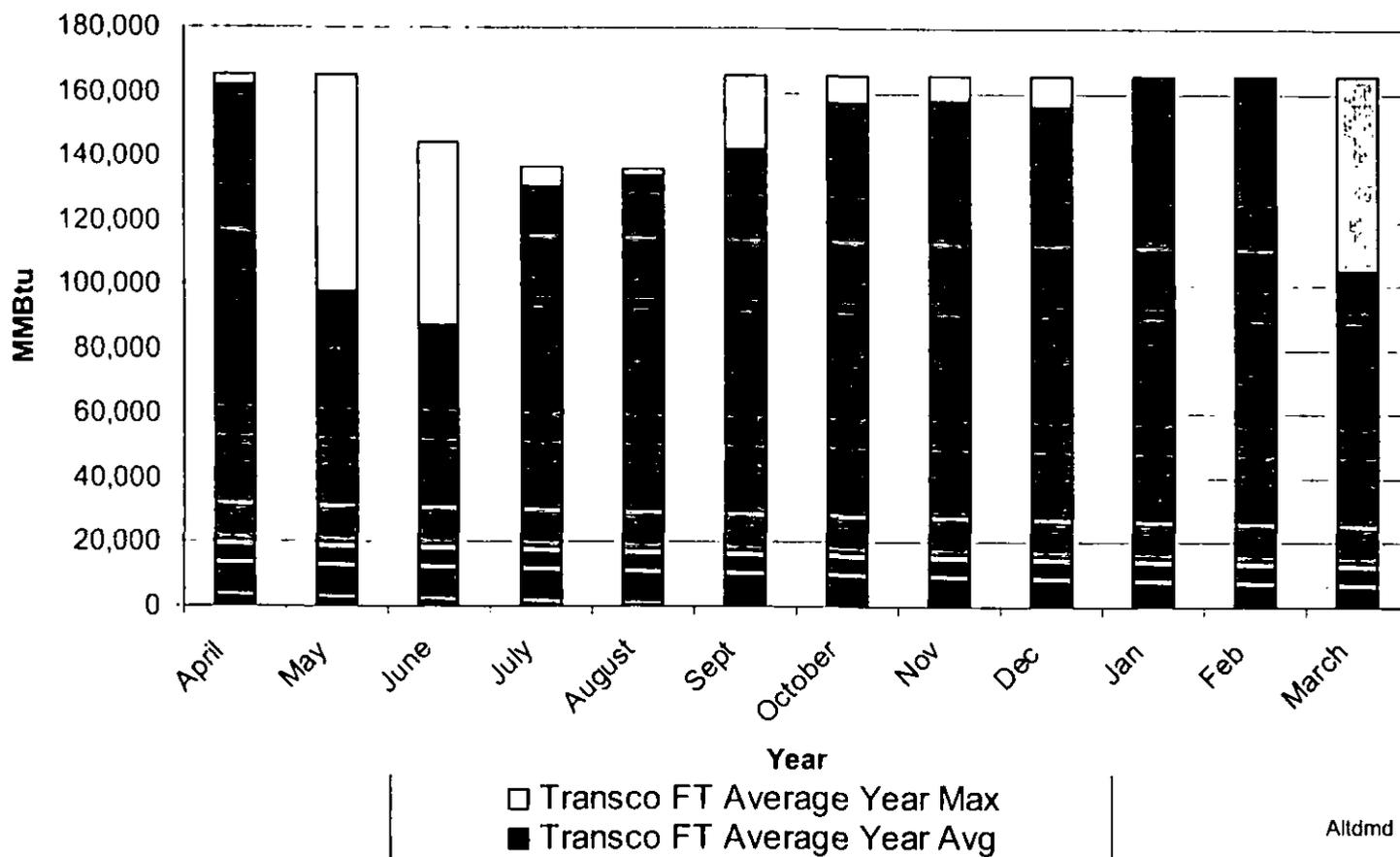
Altdmd 724a

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Transco FT Average Case Utilization is 84%



TRANSCO FT PIPELINE CAPACITY UTILIZATION



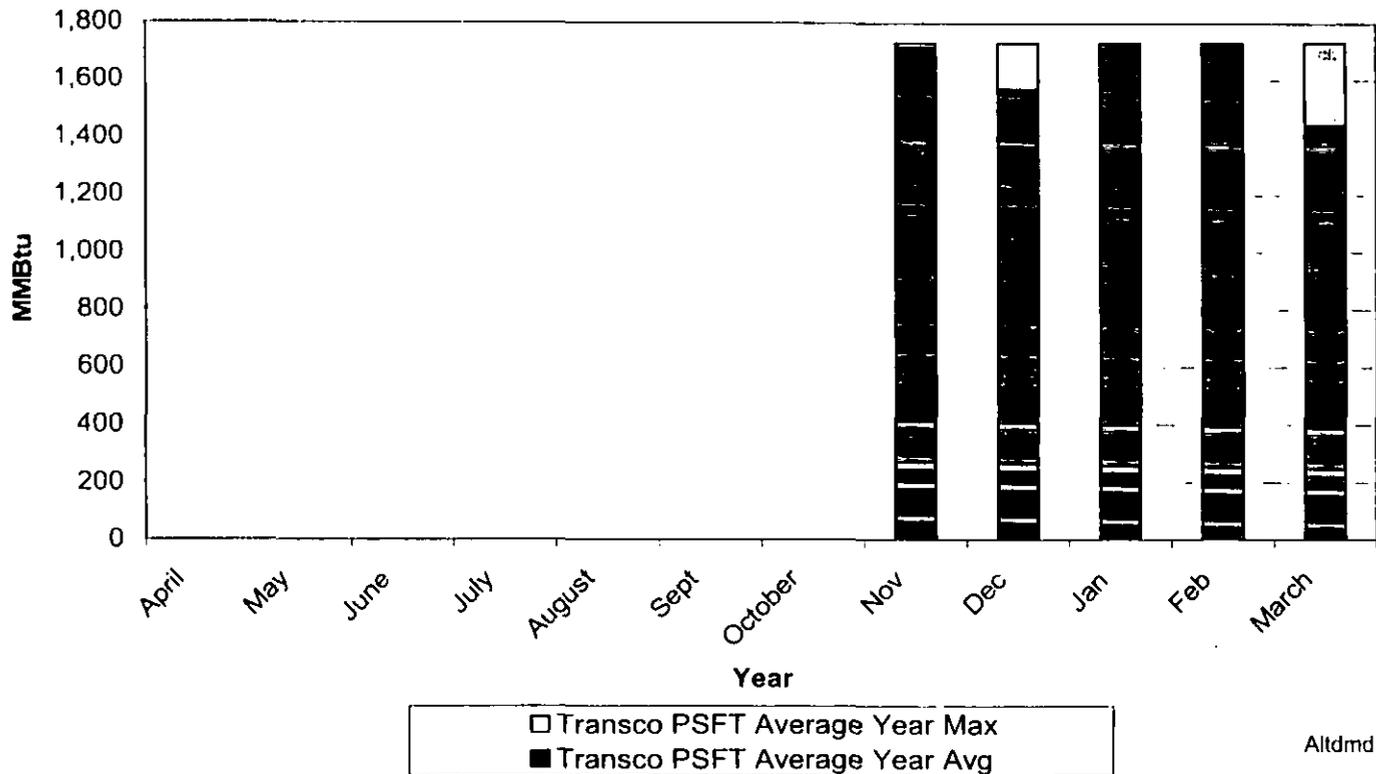
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Transco PS-FT Average Case Utilization is over 90% in Winter



TRANSCO PS-FT PIPELINE CAPACITY UTILIZATION



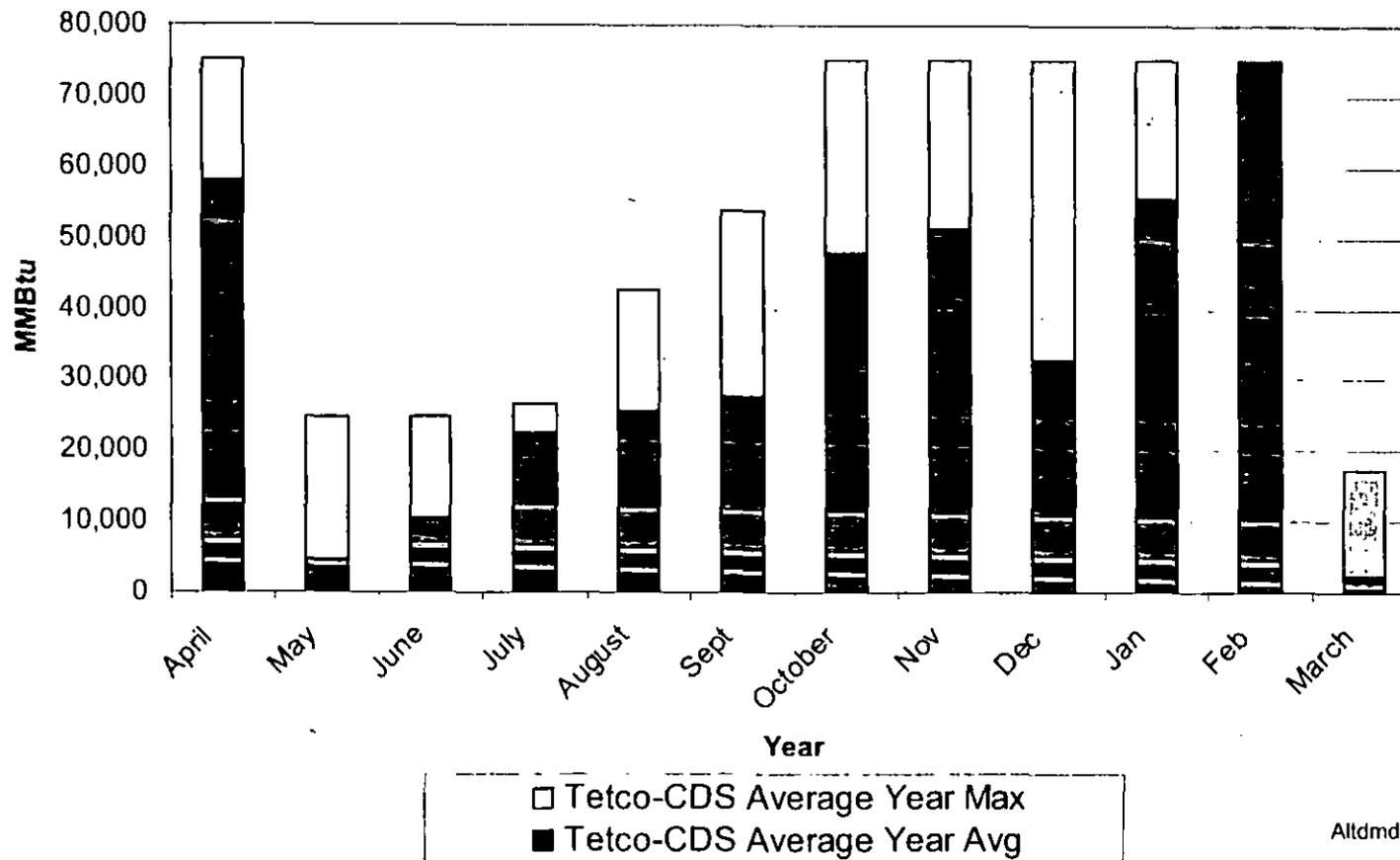
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Tetco CDS Average Case Utilization is 46%



TETCO CDS PIPELINE CAPACITY UTILIZATION



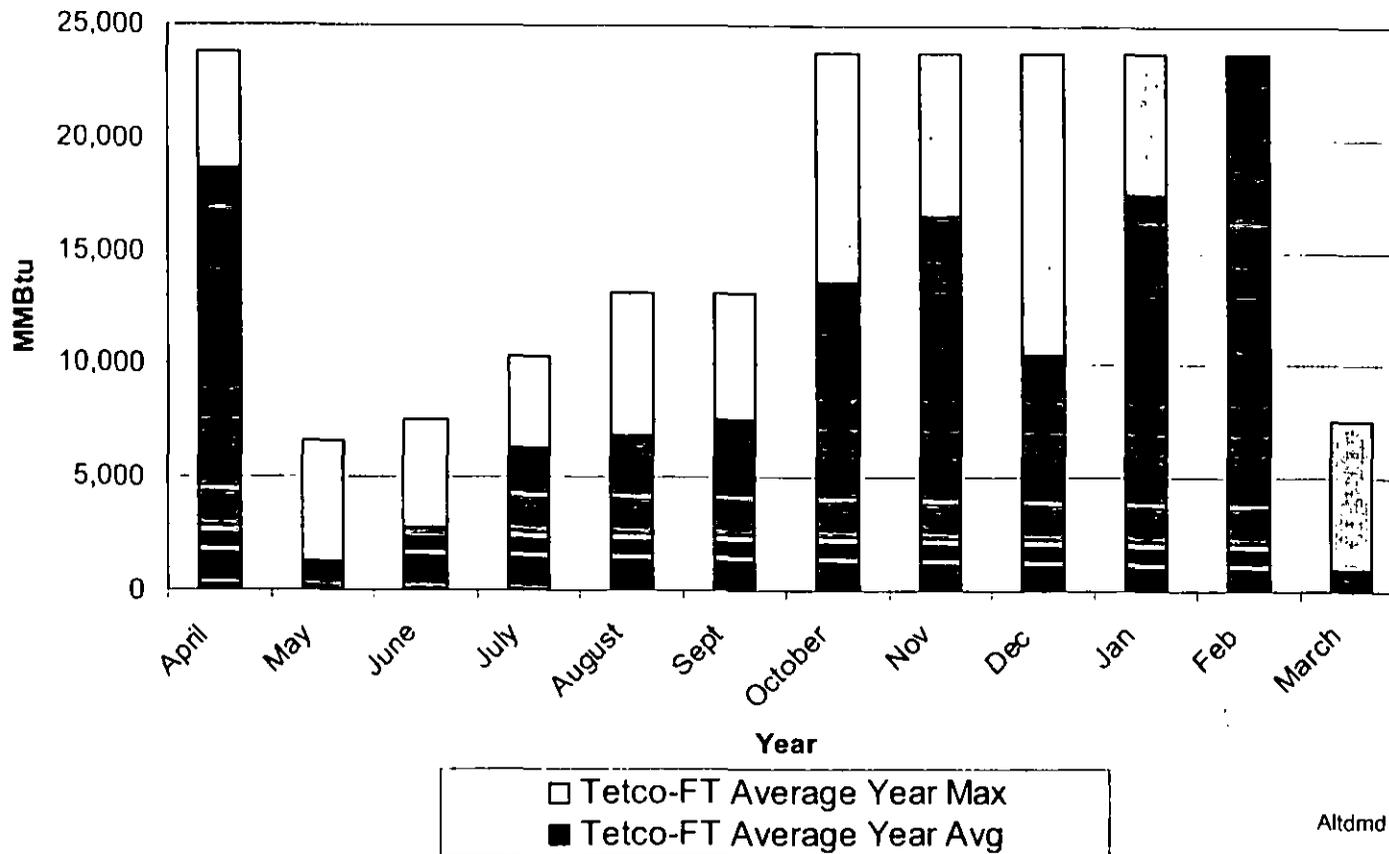
Alldmd 724a

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Tetco FT Average Case Utilization is 44%



TETCO FT PIPELINE CAPACITY UTILIZATION



Altdmd 724a

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Opportunities for Pipeline Capacity Release and Off – System Sales



- Based on design year system utilization, PGW can offer firm released capacity on both systems in summer and shoulder periods.
- ICF has estimated the intrinsic value of the spare capacity.
 - For Transco FT and PSFT between \$1.2 MM and \$2.5 MM.
 - For Tetco FT and CDS, up to \$6.2 MM
 - (Calculated as basis-sum of fuel and commodity rate x unused capacity)
- The PAID capacity is potentially very valuable in average years where it could be called and resold during peak periods.

Findings – Storage

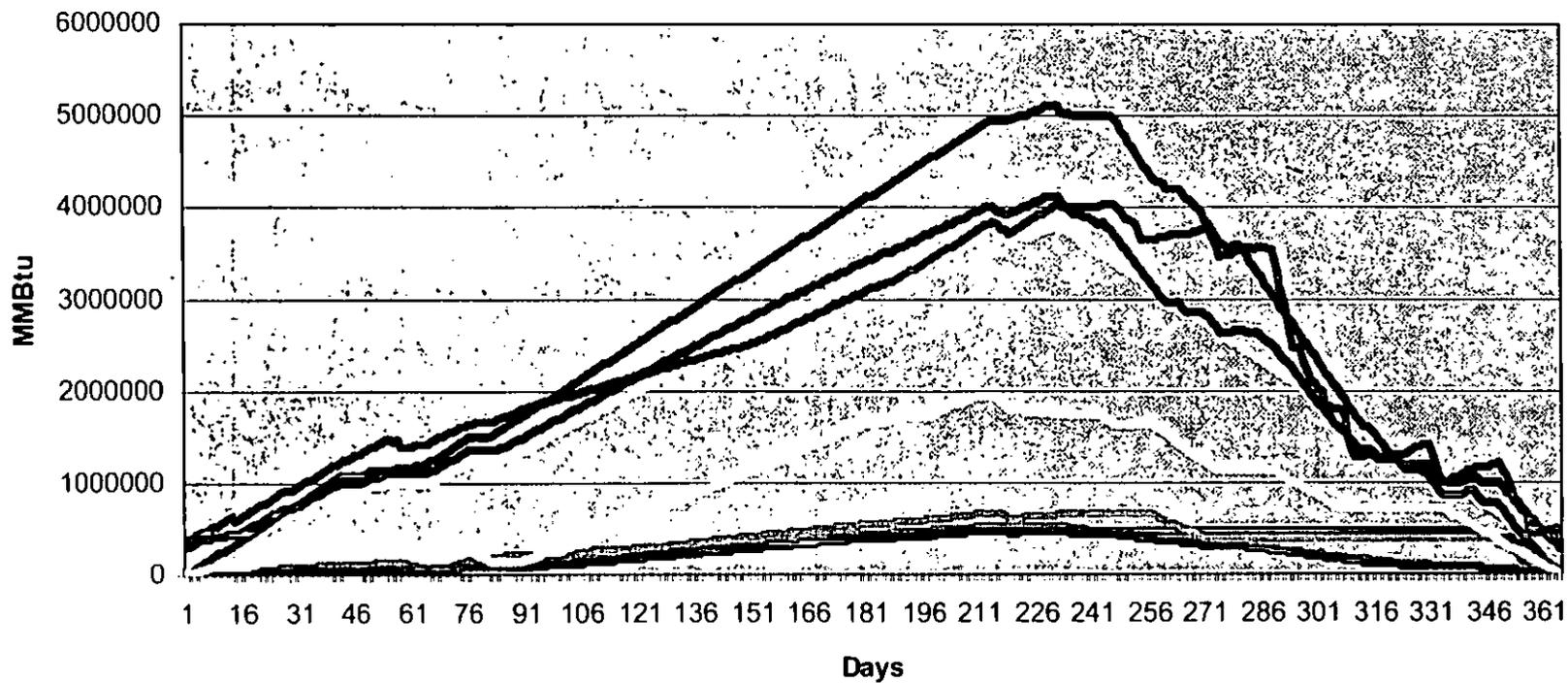


- The optimization of the system suggests that PGW makes effective use of all of its storage services.
 - Capacity factors for the storage services are very high, even during average years.
 - Where storage services share mainline capacity, they are less valuable on peak days, but are used the rest of the season. Eminence, for example, is not used on peak days, but is fully used the rest of the year.
- Transco WSS despite its lower than contracted usage, is nevertheless a valuable storage for optimizing gas purchases and supply security.
- Equitrans storage should be examined in greater detail – it also provides benefits in supply purchasing, but these do not offset the higher fixed costs in the pricing scenarios analyzed.

Reference Case Storage Patterns



Reference Storage Inventory



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Reference Case Storage

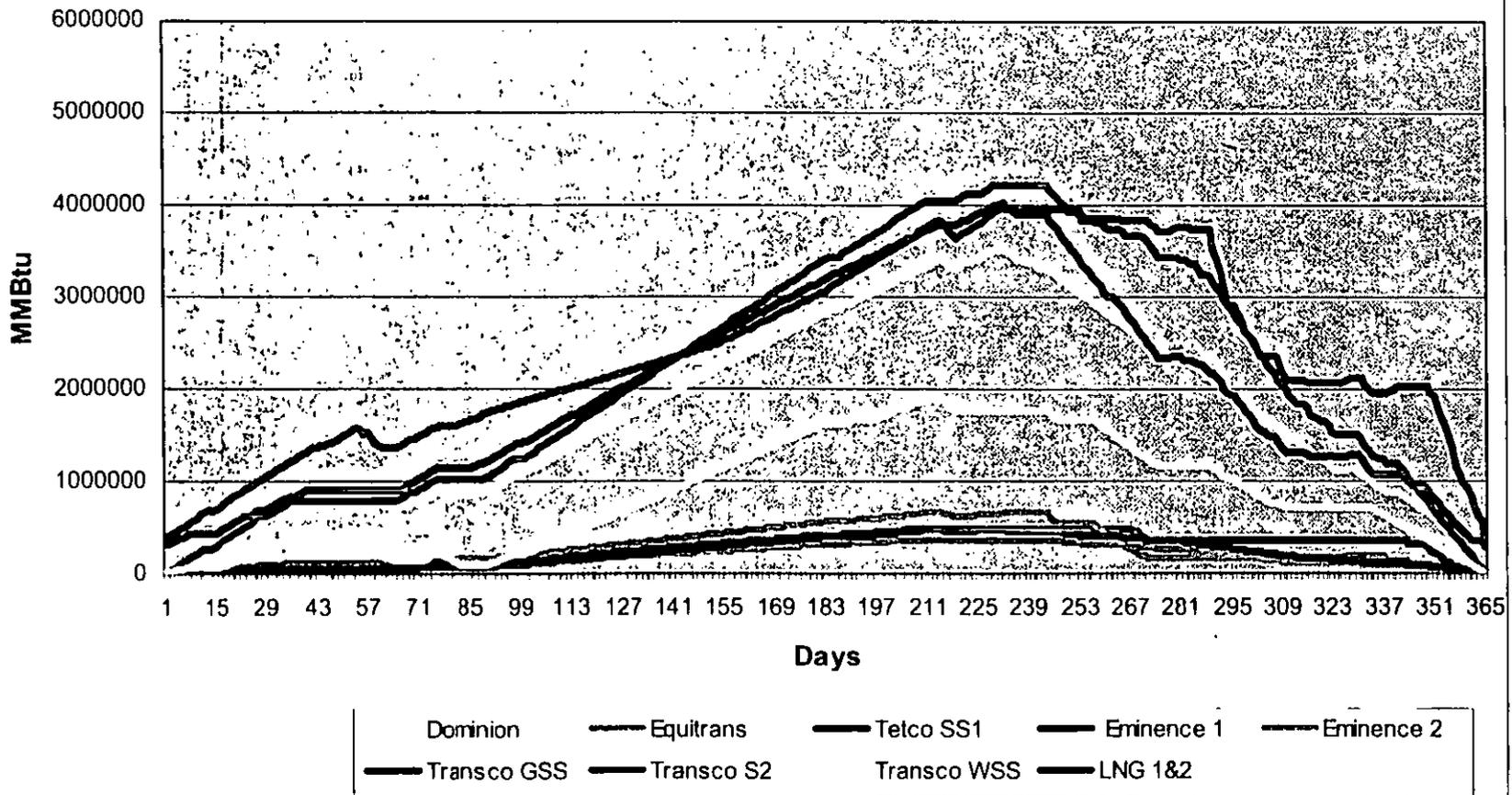


- The graphic shows the pattern of storage injection and withdrawal and the peak quantities put into storage for each storage service.
- The large storage services (Dominion, Tetco SS1 and Transco GSS) are almost fully utilized in the design year optimization.
- LNG is also filled to near capacity.
- The smaller storage services are also filled.
- WSS appears to be on the margin, not reaching its full contracted capacity.

Average Year Storage Patterns



Average Yr. Storage Inventory



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Average Year Storage Utilization

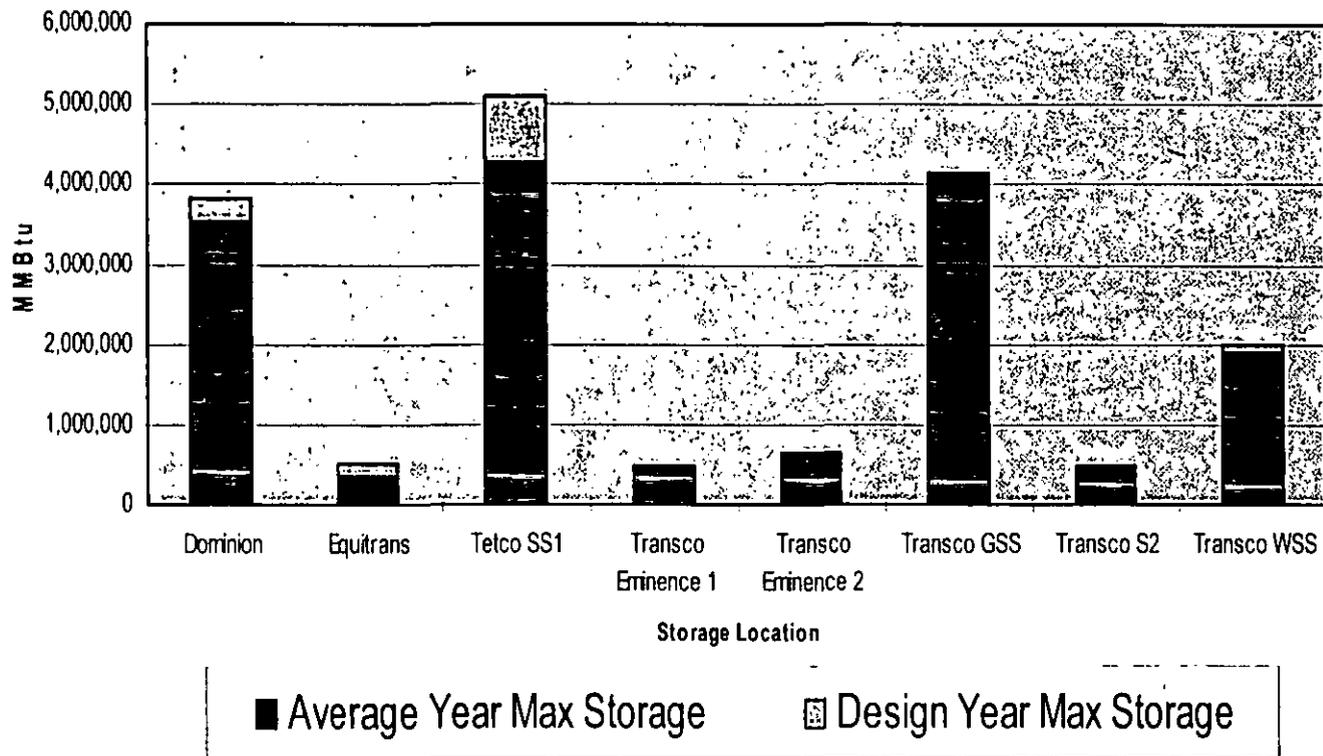


- ▣ As expected the model does not fill contracted storage services at the same level as would be expected in a design year
 - (The model has perfect foresight, however, which gas planners do not have.)
 - Gas planners must anticipate design conditions for storage injection.
- ▣ The interesting pattern is that the model still fills most of the storage services even when planning for an average winter.

Storage Capacity Utilization is Similar for Design and Average Year Sendout



Maximum Storage by Storage Location



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Transco WSS has the Lowest Capacity Factor



	Storage Cap	Design Year	Cap Factor	Average Year	Cap Factor
Dominion	3,918,971	3,822,823	0.98	3,526,063	0.90
Equitrans	522,500	521,814	1.00	367,475	0.70
Tetco SS1	5,109,200	5,109,200	1.00	4,272,260	0.84
Eminence 1	482,792	482,792	1.00	482,792	1.00
Eminence 2	656,013	656,013	1.00	656,013	1.00
Transco GSS	4,123,733	4,123,733	1.00	4,114,258	1.00
Transco S2	466,548	466,548	1.00	466,548	1.00
Transco WSS	3,335,909	1,981,522	0.59	1,906,339	0.57

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Storage Value also Depends on Price Volatility



- We tested a case where volatility and the price difference between summer and winter grew – our high volatility case.
 - We gradually increased winter gas prices to \$0.75/MMBtu by Dec. 1, declining back to base levels by April 1
- Results show higher utilization of storage consistent with current levels of storage capacity
- WSS still does not reach current storage capacity levels.

	Storage Cap	Design Year	Hi Volatility
Dominion	3,918,971	3,822,823	3,902,284
Equitrans	522,500	521,814	521,814
Tetco SS1	5,109,200	5,109,200	5,109,200
Eminence 1	482,792	482,792	482,792
Eminence 2	656,013	656,013	656,013
Transco GSS	4,123,733	4,123,733	4,123,733
Transco S2	466,548	466,548	466,548
Transco WSS	3,335,909	1,981,522	2,987,263

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What Happens when WSS is Reduced?



- ▣ Because WSS uses long haul transportation, it's role appears to be maximized when there is price volatility.
- ▣ When WSS storage is eliminated, total system costs increase by about \$1.5 million, mostly in purchased gas costs
- ▣ The value of WSS is related to its ability to take advantage of the volatility in gas prices.
 - When gas prices drop in the Gulf, PGW can store gas in WSS
 - When prices spike PGW does not have to buy
 - WSS value is therefore tied to its optionality
- ▣ WSS also provides supply security, as during the recent hurricane events, where it allowed PGW to bank supplies against winter shortfalls on Transco supply from the Gulf.

What Happens when Equitrans Storage is Reduced?



- ICF also tested the question of whether reducing Equitrans would affect overall costs.
- When Equitrans is reduced, savings occur in lower storage costs (eliminating Equitrans fixed costs) and lower pipeline transportation costs (Equitrans and Tetco FTS)
- The results are similar to WSS elimination
 - Fixed costs decline
 - Purchased gas costs increase
- However with Equitrans, the higher gas costs do not offset the savings in reservation and operating costs. The savings are modest – about \$0.4 million
 - These results are dependent on gas price volatility and seasonal patterns.
 - When the high volatility case is considered, Equitrans becomes more valuable.

Background on LNG Issues



- Current System
 - Total storage capacity is just over 4 Bcf
 - Liquefaction is a combination of the old Cascade system and the new expander system
 - Expander liquefaction is limited in summer due to low system throughput and can be expected to produce 2 Bcf
 - Expander can operate in winter, unlike the cascade system
 - Cascade system is old and requires overhaul each year but can fill the remainder of the tank
- Analysis thus far indicates that LNG storage and sendout are strategic elements of the supply portfolio because of flexibility and low cost relative to other options.
- Key question is whether to replace the cascade system?
 - Costs
 - Other LNG options

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Alternative Sources of LNG -- Barging



Scale favors barging: typical barges hold 5,000 to 10,000 cubic meters of LNG (112,000 to 225,000 MMBtu)

- To top off the tank with 2.5 Bcf would take about 12 to 23 deliveries
- Most barge systems anticipate barging from import terminals, not lightering directly from ships
- Barge costs average about \$45 to \$50 million
- LNG terminal operators (e.g., Dominion) have looked into barging for longer term market planning but nothing is available in near term
- There currently are no plans for barging services from Cove Point or Distrigas
- It is possible that a Crown Landing project, if developed, could provide barges of LNG for PGW

Alternative Sources of LNG -- Trucking

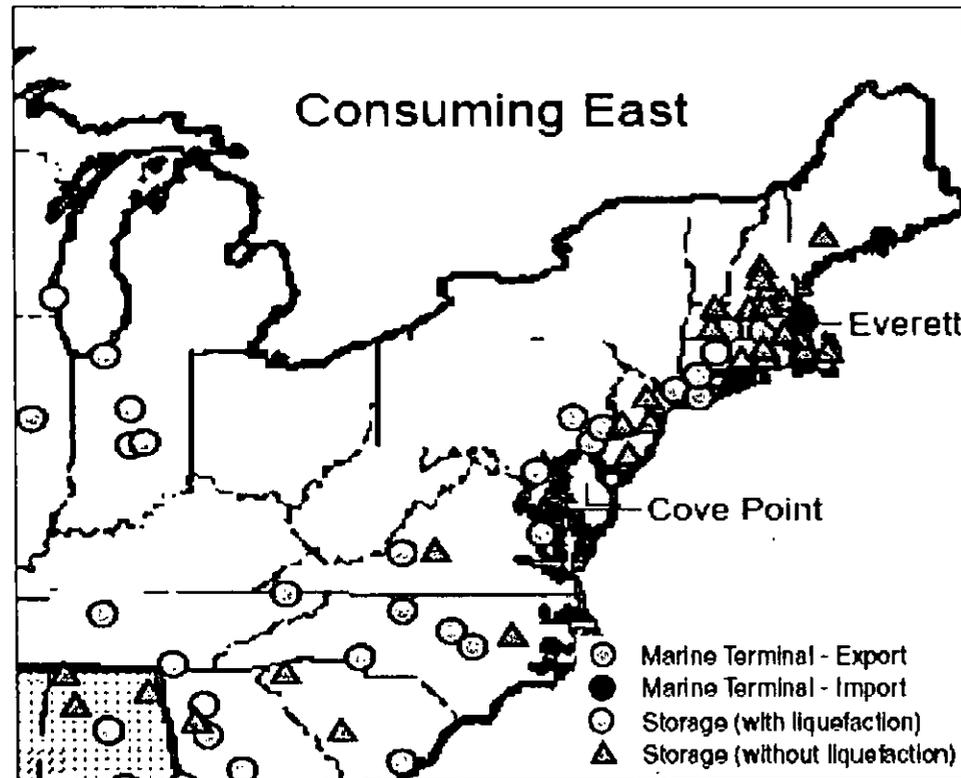


- Trucks hold typically 10,000 gallons, about 750-1,000 MMBtu
 - To top off the tank with 2.5 Bcf, would take about 3,000 truck loads when only about 1800 trucks (1.5Bcf) can be physically unloaded between March and November
 - Nearest large sources of LNG would be Distrigas (outside Boston) and Transco's facility outside New York
- Distrigas LNG costs are based on delivered gas prices in New England, plus liquefaction charges plus redelivery costs by truck.
 - 2006 average costs have been \$7.54/Dt off Algonquin, plus liquefaction charges of between \$1.50 and \$2.50/Dt
 - Transport costs estimated by PGW in 2004 at \$2.74/Dt
- Transco LNG-S service requires buyers supply the gas, pay \$0.64/Dt fee and 14.6% fuel retention. Trucking costs are additional.
- Trucking presents logistical challenges in the large number of trucks that would be required

Regional LNG Liquefaction



- Regional liquefaction supports local peaking needs, where facilities have contracts for servicing satellite storage and peaking.
- Nearest large facilities are are Distrigas (Everett) and Transco Station 240 (Carlstadt, N.J.)



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Expanding the LNG Liquefaction Capability



- A new nitrogen based system would cost about \$22 million
 - Capacity would be 14,000 Mcf per day between April and November
 - For our analysis, we estimated a fixed charge payment of \$0.68/Dt
 - Major operating cost would be fuel – it consumes about 14.6% of gas (compared to about 0.75% for the expander system)
 - (This estimate is comparable to Transco LNG-S service, less the costs of trucking.)

- PGW is considering an option where 1 Bcf of LNG storage and sendout capability in the winter could be made available to off system customers.
 - This would help reduce the costs to PGW of the new system.
 - All of our storage sensitivities assumed this option.

Modeling LNG



- ICF's approach was to model the existing expander system and a proposed new system.
 - Current expander system has limitations on liquefaction due to low summer system send out. At most the expander system can deliver about 2.5 Bcf, before boil-off of 2,000 Mcf per day.
 - The current cascade system can fill the balance of the tank, but due to age and high operating costs is scheduled for retirement.
 - New system is estimated to cost \$22 million, and would be able to work in tandem with the expander system to fill the tank.
- We modeled the expander (LNG1) and the new system (LNG2)
 - Capital costs of the expander were considered sunk; the capital costs of the new system were included in the cost of operations.
 - Operating costs were included for both.

Modeling LNG (contd.)



- LNG expansion was looked at in three ways
 - Full availability of the new unit (LNG 1&2 -- Reference Case)
 - No LNG liquefaction expansion (No LNG 2 Case)
 - Reserving 1 Bcf of storage for off system sales (LNG 1Bcf Case)
- All cases assumed no cascade system

Findings – LNG Liquefaction

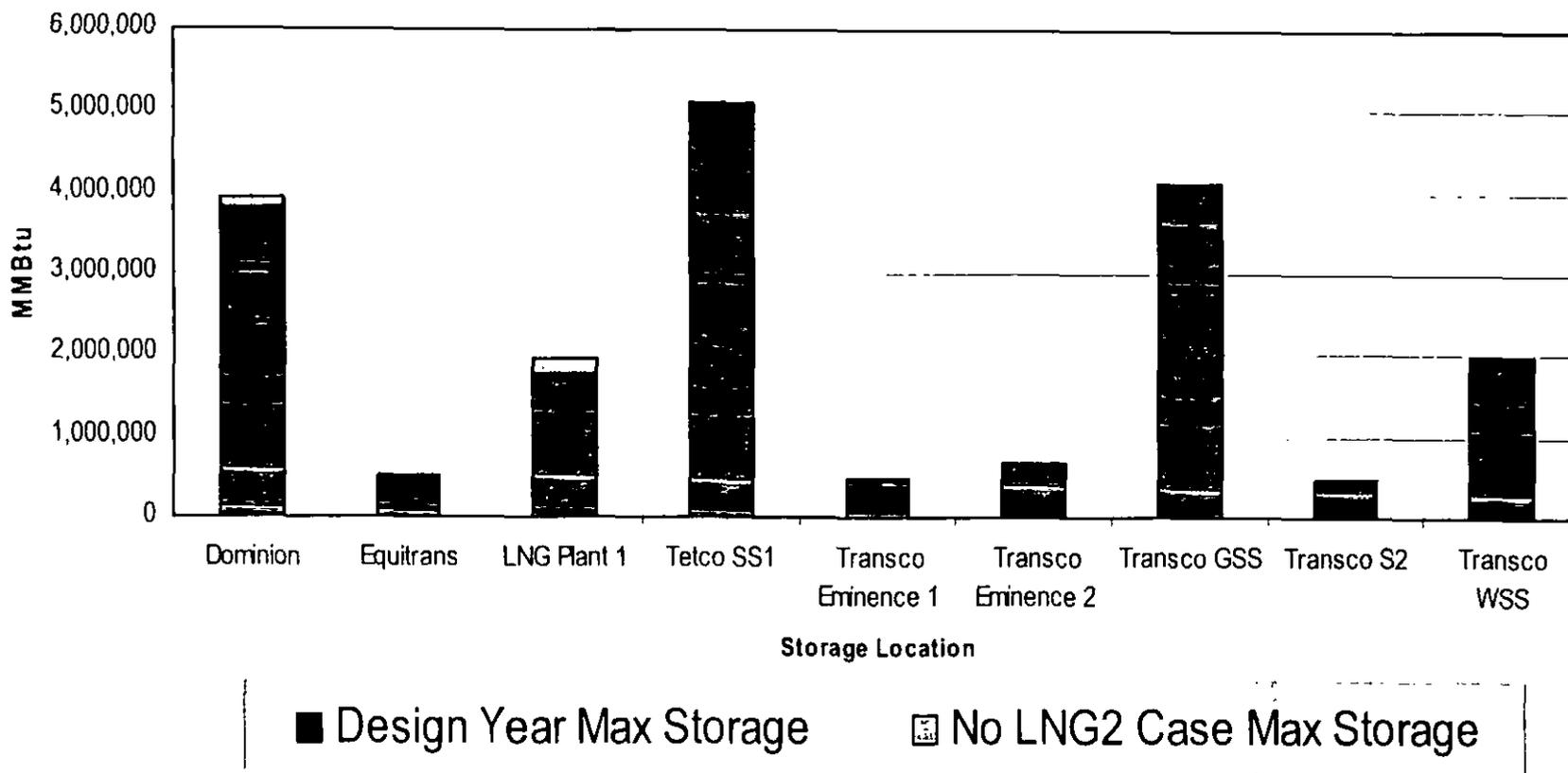


- Under all conditions, the least cost solution will maximize LNG storage and use
 - LNG reduces overall system costs
- PGW must have additional liquefaction capacity beyond the expander system to meet native load
 - Cases without expansion led to extensive winter-long interruption of smaller interruptible customers, pushing them into fuel oil markets.
 - The decision to complete the replacement of the Cascade with a newer lower operating and maintenance cost system is essentially an engineering benefit/cost analysis
- A deal where 1 Bcf of LNG storage is dedicated to a third party does not harm your ability to meet domestic load even in a design year.
 - Such a deal should be very advantageous to a third party gas marketer and hence valuable to PGW.

No LNG 2 Case (no Liquefaction Expansion): Small Effect on Traditional Storage



Maximum Storage by Storage Location



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No LNG 2 Case: Modest Effect on Pipeline Utilization

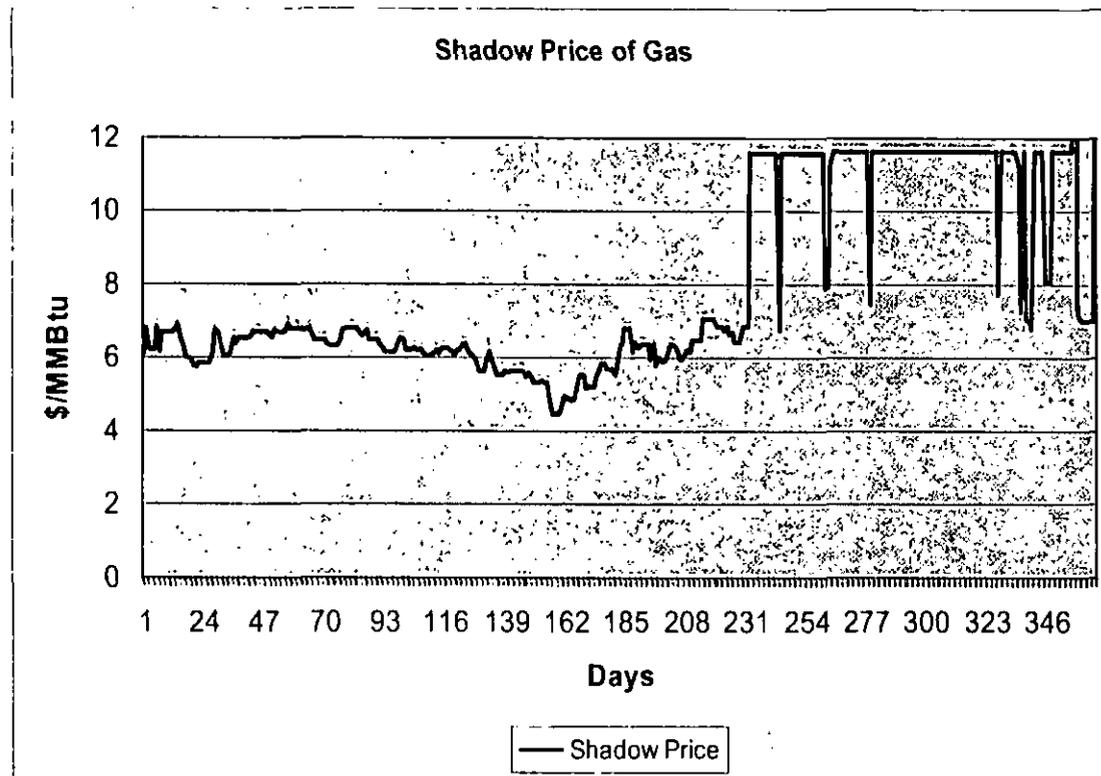


- Drives Tetco CDS to 60% load factor (relative to Reference case LF of 56%)
 - CDS will fill up in December and climb to 75% of capacity in March
- Tetco FT also increases overall load factor to 58% with increases in December (98%) and March (76%)
- Transco summer utilization declines as less gas is needed to meet liquefaction requirements.

No LNG 2 Case: Large Effect on Interruption and Shadow Price of Gas



- No LNG 2, leaves winter deliverability unable to meet interruptible load.
- Interruptible (LBS, BPS) customers switch to distillate fuel oil, driving the shadow price of gas to fuel oil prices.
- The system is left with little cushion.
- The case where there is no expansion of liquefaction costs \$19.6 million more than the reference case.



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LNG 1 Bcf Case Tests

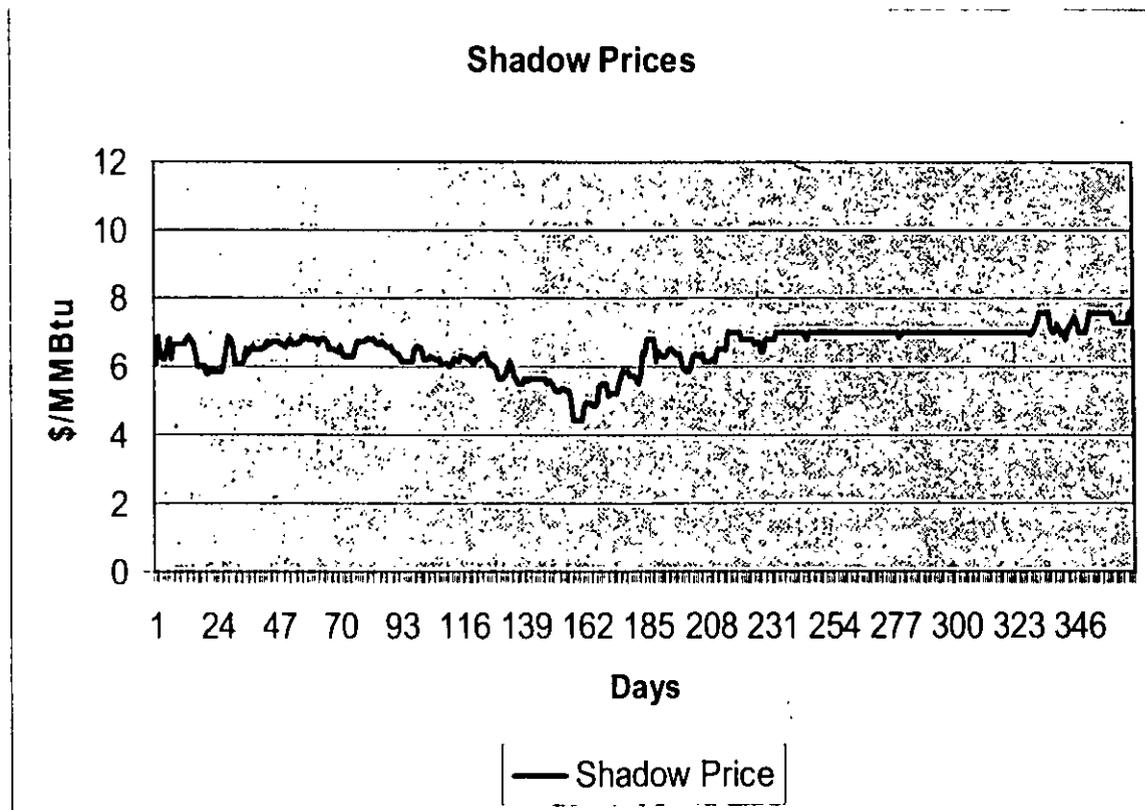


- ICF ran several sensitivities to test whether the allocation to a third party of 1 Bcf of LNG storage inventory combined with a reduction of LNG sendout capability by 25% affects your ability to meet sendout requirements.
- Cases tested were
 - Reference Case (Design Winter)
 - Elimination alternatively of Eminence, Equitrans, Transco S2, Transco WSS
- In all cases there is adequate supply capability to meet sendout requirements, without interruptions.

LNG 1 Bcf Case does not Affect Sendout



- Reducing LNG storage by 1 Bcf does not lead to interruption
- This assumes that PAID capacity is available.
- When PAID capacity *is not* available, increased interruption occurs in March as inventory is depleted and sendout LNG sendout is compromised.
- The LNG 1 Bcf case creates savings through the off-system sales.

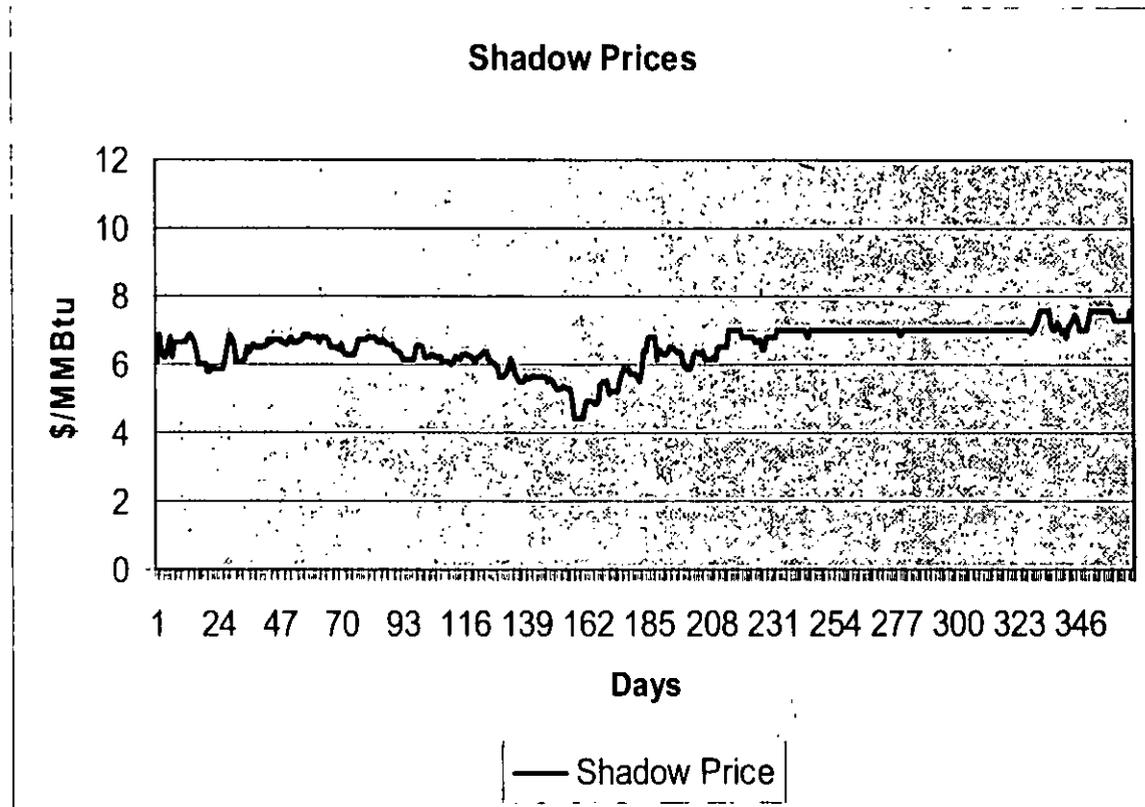


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LNG 1 Bcf Case and No Equitrans Suggests a Closer Look at Equitrans



- Reducing LNG storage by 1 Bcf combined with reducing Equitrans does not lead to interruption.
- Our estimate that the savings from avoided Equitrans (and associated transportation) fixed costs is partially offset by higher purchased gas costs.
- On net, eliminating Equitrans creates a \$0.4 million savings
- Higher volatility in gas prices will reduce this advantage.



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Outline

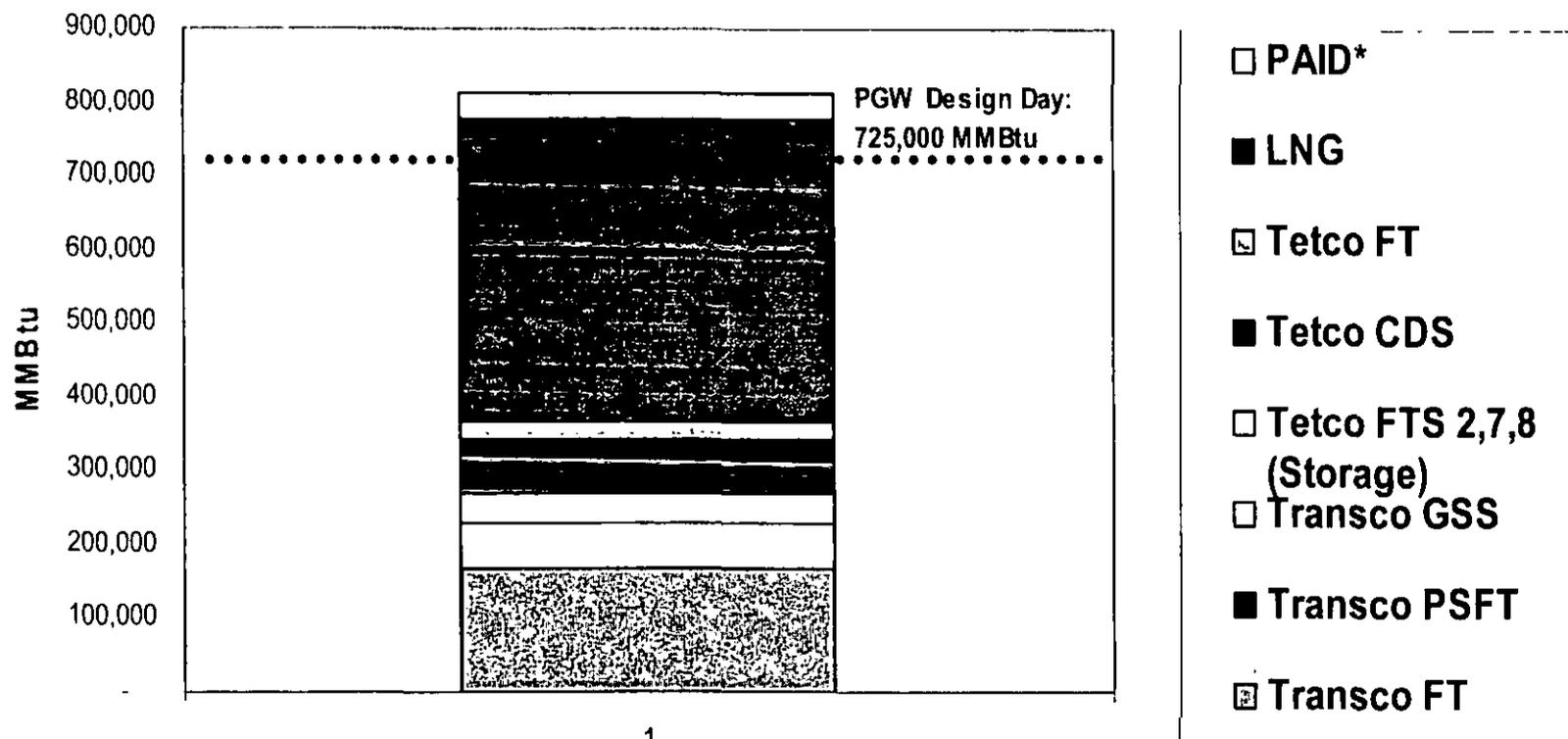


- Introduction
- Market Context
- Design Winter and Day Analysis
- Supply Analysis and Issues
- Conclusions and Recommendations

Observation: Design Day Deliverability is an Incomplete Measure of Asset Value



PGW Design Day Stack MDQ



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PAID released capacity has no annual demand charge.

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Observation: Design Day Deliverability is an Incomplete Measure of Asset Value



- Comparing Design Day requirements with available options is not a complete analysis.
- PGW operates with a 12 percent reserve margin over Design Day sendout requirements. This does not appear unreasonable.
 - Deliverability options on Design Day include
 - Transco long haul pipeline capacity
 - Transco GSS storage
 - Tetco/Dominion/Equitrans Storage delivered through Tetco FTS services
 - LNG
 - PAID – released capacity which has no long term fixed costs
- Design Day does not account for “Design Hour” requirements to maintain system pressures
- Design Day does not account for storage optionality in volatile gas markets.

Conclusions and Recommendations



- ❖ PGW's approach to estimating design winter and day conditions is reasonable and yields results that are prudent for capacity planning purposes.
- ❖ PGW uses its full pipeline capacity during winter seasons. Overall capacity utilization is higher for Transco, which is the lower cost pipeline, than it is for Tetco.
 - PGW has some opportunities to release capacity on these pipes, or engage in off-system sales when capacity is not needed for native load.
 - PGW should not permanently release capacity without call-back rights for winter seasons.
- ❖ PGW storage services appear adequate to meet peak requirements.

Conclusions and Recommendations contd.



- 11 WSS is seldom used to full capacity due largely to the fact it must use mainline pipeline capacity to redeliver gas.
 - Nevertheless, WSS is strategic for optimizing gas purchases and hedging prices to the system. Eliminating WSS would cost the system more than the savings from avoided reservation charges.
- 12 Equitrans storage is a close call and should be looked at carefully
- 13 Trading opportunities exist around the WSS, Equitrans, and other storage services in conjunction with pipeline capacity – however, this was not analyzed.
 - Any off system sales employing LNG would require coordination among all PGW's supply assets.
- 14 LNG optimization must focus on improving liquefaction capabilities.
 - Without expanding the liquefaction above the expander system, substantial interruptions could occur.
 - A strategy to use an expanded system to undertake third party sales would create benefits for PGW and its customers.

Docket No. R-07XXX

Item 53.64(i)(1)

Philadelphia Gas Works

Pennsylvania Public Utility Commission

52 PA Code 53.61, et seq.

Item 53.64(i) Utilities shall comply with the following:

- (1) Thirty days prior to the filing of a tariff reflecting increases or decreases in purchased gas expenses, gas utilities under 66 Pa.C.S. § 1307 (f) recovering expenses under that section shall file a statement for the 12-month period ending 2 months prior to the filing date under 66 Pa.C.S. § 1307(f) as published in accordance with subsection (b) which shall specify:
 - (i) The total revenues received under 66 Pa.C.S. § 1307(a), (b) or (f), including fuel revenues received, whether shown on the bill as 66 Pa.C.S. § 1307(f) as published in accordance with subsection (b) which shall specify:
 - (ii) The total gas expenses incurred.
 - (iii) The difference between the amounts in sub paragraphs (i) and (ii).
 - (iv) Evidence explaining how actual costs incurred differ from the costs allowed under subparagraph (ii).
 - (v) How these costs are consistent with a least cost fuel procurement policy, as required by 66 Pa.C.S. § 1318 (relating to determination of just and reasonable natural gas rates).

Response: Please see attached schedule. Additionally, please refer to Item 53.64(c)(6) for a detailed discussion regarding the company's least cost fuel procurement policy.

GCR
STATEMENT OF RECONCILIATION
January through December 2006

		NET COST OF FUEL	FIRM SALES	IRC FACTOR APPLIED	INTERRUPT REVENUE CREDIT	APPLICABLE EXPENSES	GCR FACTOR APPLIED	GCR REVENUE BILLED	OVER/ (UNDER) RECOVERY	NATURAL GAS REFUNDS	CUMULATIVE OVER/(UNDER) RECOVERY
		1	2	3	4= (2 *3)	5 = (1 - 4)	6	7	8=7-5	9	10
		\$	(Mcf)	\$	\$	\$	\$	\$	\$	\$	\$
PRIOR YEAR'S CARRYOVER:											(59,561,303)
JANUARY 06	Actual	95,464,674	8,099,883	0.1960	1,587,577	93,877,097	12.5632	101,728,280	7,851,183	186,076	(51,524,044)
FEBRUARY	Actual	91,242,555	7,578,910	0.1960	1,485,466	89,757,089	12.5632	95,160,912	5,403,823	0	(46,120,220)
MARCH	Actual	71,601,995	7,174,333	0.1960	1,406,169	70,195,826	12.5632	90,111,685	19,915,859	0	(26,204,361)
APRIL *	Actual	28,012,400	4,131,863	0.1960	809,845	27,202,555	12.5632	51,664,280	24,461,725	0	(1,742,636)
MAY	Actual	16,029,235	2,021,163	0.1960	396,148	15,633,087	12.5632	25,750,849	10,117,762	0	8,375,126
JUNE *	Actual	17,789,076	1,510,585	0.2060	311,105	17,477,971	11.9095	17,814,089	336,118	16,133	8,727,377
JULY *	Actual	13,516,388	1,248,614	0.2159	269,576	13,246,812	11.2558	14,009,367	762,555	0	9,489,932
AUGUST 06 *	Actual	<u>14,356,355</u>	<u>1,115,682</u>	0.2159	<u>240,876</u>	<u>14,115,479</u>	11.2558	<u>12,450,004</u>	<u>(1,665,475)</u>	<u>595,478</u>	<u>8,419,934</u>
SUBTOTAL JAN. TO AUG. 06		<u>348,012,678</u>	<u>32,881,032</u>		<u>6,506,762</u>	<u>341,505,916</u>		<u>408,689,466</u>	<u>67,183,550</u>	<u>797,687</u>	<u>8,419,934</u>
2005-2006 FINALIZED OVERCOLLECTION											8,419,934
2005-2006 INTEREST CREDIT ON COMMODITY											<u>1,414,333</u>
TOTAL "E" FACTOR											7,005,601
SEPTEMBER 06 *	Actual	14,913,479	1,189,490	0.2159	256,811	14,656,668	11.2558	13,367,379	(1,289,289)	0	5,716,312
OCTOBER	Actual	27,000,627	1,690,638	0.2159	365,009	26,635,618	11.2558	19,002,000	(7,633,618)	101,017	(1,816,290)
NOVEMBER	Actual	39,228,787	3,605,450	0.2159	778,417	38,450,370	11.2558	40,608,317	2,157,947	0	341,657
DECEMBER 06	Actual	<u>68,599,816</u>	<u>5,214,295</u>	0.1794	<u>935,445</u>	<u>67,664,371</u>	11.0839	<u>58,870,473</u>	<u>(8,793,898)</u>		<u>(8,452,241)</u>
SUBTOTAL SEPT. TO DEC. 06		<u>149,742,709</u>	<u>11,699,873</u>		<u>2,335,681</u>	<u>147,407,028</u>		<u>131,848,169</u>	<u>(15,558,859)</u>	<u>101,017</u>	<u>(8,452,241)</u>
TOTAL 2006		497,755,387	44,580,904		8,842,443	488,912,944		540,537,635	51,624,691	898,704	(8,452,241)

* Actual GCR Revenue Revised

Docket No. R-07XXX

Item 53.65 (1)

Philadelphia Gas Works

Pennsylvania Public Utility Commission

52 Pa. Code §53.61. et seq.

Item 53.65 (1)

The costs of the affiliated gas, transportation or storage as compared to the average market price of other gas, transportation or storage and the price of other sources of gas, transportation and storage.

Response:

PGW has no affiliates. see response to 53.64(c)(1) for price of gas, transportation and storage.

Docket No. R-07XXX
Item 53.65 (2)

Philadelphia Gas Works

Pennsylvania Public Utility Commission
52 Pa. Code §53.61, et seq.

Item 53.65 (2)

Estimates of the quantity of gas, transportation or storage available to the utility from all sources.

Response:

PGW has no affiliates and provided is a summary of all transport, storage and LNG capacity.