



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

October 26, 2015

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

Re: Pennsylvania Public Utility Commission v.  
Philadelphia Gas Works  
Docket No. P-2015-2501500

Dear Secretary Chiavetta:

Enclosed please find an original copy of the Bureau of Investigation and Enforcement's (I&E) **Answer to Environmental Defense Fund's (EDF) Petition to Intervene, as well as I&E's Motion to Strike EDF's Direct Testimony.** Please note that for ease of reference, I&E has consolidated both of these pleadings into one document.

Copies are being served on all active parties of record, as well as EDF's counsel. If you have any questions, please contact me at (717) 787-8754

Sincerely,

Gina L. Lauffer  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #313863

Carrie B. Wright  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #208185

CBW/GLL/snc  
Enclosure

cc: Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. P-2015-2501500  
 :  
 Philadelphia Gas Works :

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Answer to EDF Petition to Intervene & I&E's Motion to Strike EDF's Direct Testimony** dated October 26, 2015, in the manner and upon the persons listed below, in accordance with the requirements of § 1.54 (relating to service by a party):

**Served via Electronic and First Class Mail**

Daniel Clearfield, Esquire  
Carl Shultz, Esquire  
Eckert Seamans Cherin & Mellott LLC  
213 Market Street  
8th Floor  
Harrisburg, PA 17101

Erin L. Gannon, Esquire  
Darryl Lawrence, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor Forum Place  
Harrisburg, PA 17101-1923

Abby Pozefsky, Esq.  
Chief Administrative Officer and General  
Counsel  
Philadelphia Gas Works  
800 W. Montgomery Ave.  
Philadelphia, PA 19122

Sharon E. Webb, Esquire  
Office of Small Business Advocate  
300 North Second Street  
Suite 202  
Harrisburg, PA 17101

Adeolu A. Bakare, Esquire  
McNees Wallace & Nurick, LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
(*Counsel to the PICGUG*)

Heather M. Langeland, Esquire  
Environmental Defense Fund  
200 First Avenue, Suite 200  
Pittsburgh, PA 15222

Michael Panfil, Esquire  
Environmental Defense Fund  
1875 Connecticut Ave., N.W.  
Washington, D.C. 2009

John Finigan, Esquire  
Environmental Defense Fund  
128 Winding Brook Lane  
Terrace Park, OH 45174



Gina L. Lauffer  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #313863

Carrie B. Wright  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #208185

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	
	:	<b>Docket No. P-2015-2501500</b>
<b>v.</b>	:	
	:	
<b>Philadelphia Gas Works</b>	:	

---

**ANSWER OF THE BUREAU OF INVESTIGATION & ENFORCEMENT  
IN OBJECTION TO THE PETITION TO INTERVENE OF  
ENVIRONMENTAL DEFENSE FUND AND MOTION TO STRIKE  
ENVIRONMENTAL DEFENSE FUND'S DIRECT TESTIMONY**

---

**TO ADMINISTRATIVE LAW JUDGES CHRISTOPHER P. PELL AND MARTA  
GUHL:**

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) hereby submits this Answer in objection to the Petition to Intervene of Environmental Defense Fund (“EDF”) in the above-captioned proceeding pursuant to 52 Pa. Code § 5.66. By way of general response, I&E objects to EDF's intervention in this proceeding because it fails to meet the standard for intervention under the Commission's regulations, and seeks to improperly raise issues that are clearly beyond the scope of this proceeding. For the reasons explained below, I&E respectfully requests that Administrative Law Judges Christopher P. Pell and Marta Guhl (the “ALJs”) deny EDF's Petition to Intervene. Alternatively, if EDF's Petition to Intervene is granted, pursuant to 52 Pa. Code § 5.103, I&E respectfully requests EDF's direct testimony submitted on October 19, 2015, be stricken as it is

procedurally defective, causes confusion of the issues in this proceeding, wastes time, and is irrelevant. In support of this Answer and Motion, I&E states as follows:

## **I. INTRODUCTION**

1. On September 1, 2015, Philadelphia Gas Works (“PGW” or “Company”) filed a Petition for Waiver of Provisions of Act 11 to Increase the Distribution System Improvement Charge CAP and to Permit Levelization of DSIC Charges (“Petition”). This Petition, filed at Docket No. P-2015-2501500, serves as a PGW’s request that the Commission: (1) waive the current Distribution System Improvement Charge (“DSIC”) cap of 5% of distribution revenues and approve a maximum allowed DSIC of 7.5% with a total 10% cap including any reconciliations; (2) waive or suspend the requirements of Act 11 of 2012 to permit PGW to use an annual, levelized charge as the basis for establishing a DSIC, subject to a true-up based on PGW’s actual experience; (3) waive the requirements of Act 11 to exempt PGW from paying interest on DSIC over-collections, and (4) authorize the filing, on one day’s notice, of a revised Long Term Infrastructure Improvement Plan (“LTIIIP”).

2. On September 17, 2015, the Office of Consumer Advocate (the “OCA”) filed a Notice of Intervention, Public Statement, Answer, and a formal Complaint to PGW’s Petition.

3. On September 18, 2015, I&E filed an Answer to PGW’s Petition.

4. On September 21, 2015, the Office of Small Business Advocate (the "OSBA") filed an Answer, Verification, Public Statement, Notice of Appearance, and Notice of Intervention to PGW's Petition.

5. On September 21, 2015, the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") filed an Answer to PGW's Petition.

6. Pursuant to a Prehearing Conference Order dated September 30, 2015, PGW, I&E, OCA, OSBA, and PICGUG (collectively the "Parties") submitted prehearing memoranda to the presiding officers on October 1, 2015. The prehearing memoranda identified the Parties' potential witnesses and issues, and provided each party's contact information.

7. A prehearing conference was held on October 2, 2015. Counsel for the Parties participated.

8. At the prehearing conference, the Parties adopted a litigation schedule that established October 19, 2015 at noon as the deadline for the receipt of non-company direct testimony and set the hearing dates for the proceeding on November 5, 2015 and November 6, 2015. These dates were memorialized in Prehearing Order #1, which was issued on October 5, 2015.

9. On October 19, 2015, I&E received the following pleadings by mail from EDF: the Petition to Intervene of Environmental Defense Fund ("EDF Petition") dated October 13, 2015 and EDF's Motion for Admission Pro Hac Vice.

10. EDF's Petition alleges that it has at least three members in the PGW service territory and that EDF has interests and perspectives on issues in this proceeding that are not adequately represented, including but not limited to "developing a cost-effective program for reducing the methane emissions on PGW's distribution system, which includes making it a priority to replace the leakiest pipes."<sup>1</sup>

11. Additionally, at 2:46 p.m. October 19, 2015, I&E received a Commission E-Serve Notice that indicated that EDF improperly filed direct testimony<sup>2</sup> ("EDF's Direct Testimony") to the docket at P-2015-2501500.

12. At 7:51 p.m. on October 19, 2015, I&E was contacted by EDF, via e-mail, and was provided with a copy of a letter that EDF sent to the Commission. EDF's letter, addressed to the Commission's Secretary, Rosemary Chiavetta, requested that Secretary Chiavetta file EDF's Direct Testimony with the Commission, and it was accompanied by a copy of EDF's Direct Testimony.

13. The Pennsylvania Public Utility Code recognizes eligibility for intervention on the limited bases enumerated in 52 Pa.Code § 5.72:

(a) *Persons*. A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

(1) A right conferred by statute of the United States or of the Commonwealth.

---

<sup>1</sup> EDP Petition, ¶¶ 1, 13.

<sup>2</sup> Pursuant to 52 Pa. Code § 5.412a(b)(2), testimony that is not admitted into the record is not permitted to be electronically filed with the Commission.

(2) An interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.

(3) Another interest of such nature that participation of the petitioner may be in the public interest.

(b) *Commonwealth*. The Commonwealth or an officer or agency thereof may intervene as of right in a proceeding subject to subsection (a)(1)—(3).

(c) *Supersession*. Subsections (a) and (b) supersede 1 Pa. Code § 35.28 (relating to eligibility to intervene).

## II. ANSWER TO EDF's PETITION TO INTERVENE

I&E opposes EDF's Petition on the basis that EDF lacks standing to participate in this proceeding. EDF's Petition, filed late in the proceeding, fails to allege any facts to prove that it has an interest which may be directly affected and which is not already adequately represented by existing participants in this proceeding. In support of I&E's opposition, it offers the following enumerated responses to the Petition:

1. Admitted as a description of the petitioning party..
2. After reasonable investigation, I&E is without knowledge or information sufficient to form a belief as the truth of the averment contained in Paragraph 2.
3. After reasonable investigation, I&E is without knowledge or information sufficient to form a belief as to whether EDF has "extensive expertise and experience" in the areas alleged in Paragraph 3. As such, the allegations contained in Paragraph 3 are denied and strict proof of EDF's expertise and experience in Pennsylvania is demanded.

4. (a)-(c) Admitted, to the extent that Petitioner describes its areas of interest. By way of further response, although EDF touts a listing of its scientific studies and mapping projects, it fails to allege a nexus between its accomplishments, none of which focus on PGW, and its standing to intervene in this expedited proceeding. Such lack of connection confuses the issues in this expedited proceeding, which are only whether PGW's requests for waivers of certain provisions of Act 11 of 2012 should be granted and when PGW should file its revised LTIP.

5. Admitted.

6. Admitted, in part. It is admitted that PGW filed a Petition with the Commission requesting the items identified in Paragraph 6. By way of further response, aside from the requests identified in Paragraph 6, PGW's Petition also requests a waiver of the requirements of Act 11 to exempt PGW from paying interest on DSIC over-collections and authorization to file a revised LTIP on one day's notice.

7. Admitted in part, denied in part. To the extent that the averments contained in Paragraph 7 are consistent with the referenced PUC Staff Report (the "Staff Report"), they are admitted. To the extent that such averments are inconsistent with the referenced Staff Report, they are denied. By way of further response, EDF's reference to the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011 as support for its allegation that "[t]hese pipelines (cast iron mains) are, by their very nature, more prone to leakage than newer types of pipeline, and are considered to be 'at-risk mains' in PGW's Petition" is disjointed because the referenced Act of 2011 in no way speaks to PGW's

Petition. As such, Paragraph 7 offers no support for EDF's intervention in this proceeding.

8. Admitted in part, denied in part. To the extent that the averments contained in Paragraph 8 are consistent with either PGW's Petition or the Staff Report, as referenced, they are admitted. To the extent that such averments are inconsistent with either PGW's Petition or the Staff Report, as referenced, they are denied. By way of further response, the Staff Report speaks for itself and any conclusions drawn by EDF are denied.

9. Admitted in part, denied in part. It is admitted that Philadelphia's City Council suggested that PGW consider increasing its DSIC to 7.5%. To the extent that the averments contained in Paragraph 9 which reference the Staff Report are consistent with the Staff Report, they are admitted. To the extent that such averments are inconsistent with the Staff Report, they are denied. By way of further response, the Staff Report speaks for itself. Any representations of the Commission's conclusions beyond its explicit representations in the Staff Report are denied and strict proof thereof is demanded.

10. The allegations contained in Paragraph 10 are merely a recitation of PGW's position, as perceived by EDF. Accordingly, no response is required.

11. Admitted in part, denied in part. It is admitted that methane is included as an emission from the leaks in PGW's natural gas distribution system, and that ratepayers bear costs associated with leaked gas. The allegation regarding methane's impact as a pollutant is a conclusory statement that requires no response. By way of further response,

it is denied that EDF's alleged interests in PGW's pipeline replacement entitle it to the status of an intervenor. To the contrary, to possess standing to intervene, a party must have an interest in the controversy that is distinguishable from the interest shared by other citizens.<sup>3</sup> EDF's exact articulated interest, the prioritization of cost-effective pipeline replacement, is already being addressed by the OCA.<sup>4</sup> Similarly, I&E addresses the interest of ratepayer protection.<sup>5</sup>

12. I&E is without knowledge or information sufficient to form a belief as the truth of EDF's alleged organizational purposes and mission focus or its actual motivation to intervene in the current proceeding. By way of further response, EDF's motivation for intervention, as stated in Paragraph 12, is completely at odds with the testimony it improperly filed in this matter, which clearly articulated that "EDF is intervening in this proceeding, broadly in support of PSE&G's petition [to accelerate pipeline replacement], in order to ensure an economically efficacious outcome."<sup>6</sup> As the PSE&G petition referenced in EDF's Direct Testimony is identified as a "petition before the New Jersey Board of Public Utilities,"<sup>7</sup> it is disingenuous for EDF to simultaneously allege in its Petition that its motivation to intervene was propelled by concern for Pennsylvania ratepayers. Nonetheless, to the extent that EDF's stated motivations of ensuring the

---

<sup>3</sup> *Sierra Club v. Hartman*, 529 Pa. 454, 605 A.2d 309 (1992).

<sup>4</sup> OCA's Answer to PGW's Petition, p. 4: "PGW has actually experienced an increased incidence of leaks and breaks. Petition at 11-12, 15-16; PGW St. 1 at 5-9. The Company's DSIC should not be put into effect until its supporting LTIP is filed so that PGW's prioritization of main replacement can be reviewed to ensure that it is both prudent and cost-effective.

<sup>5</sup> I&E Answer to PGW's Petition, p.3: "[T]he interest of the ratepayers who may overpay as a result must also be taken into account."

<sup>6</sup> EDF Direct Testimony, p. 11.

<sup>7</sup> *Id.*

economic efficient operation of the regulated natural gas market in Pennsylvania for Pennsylvania ratepayers, and the provision of safe, adequate service whereby gas leaks are minimized are its actual motivations, these are much broader issues than are implicated by PGW's request for a waiver of provisions of Act 11 of 2012, and they could not possibly be resolved in the limited scope of this expedited proceeding.

13. Denied. By way of further response, it is denied that EDF's purported interest in the cost-effective reduction of methane emissions is implicated by PGW's Petition or appropriate for this case, as the cost-effective reduction of methane emissions is a matter of statewide concern that impacts stakeholders well beyond the scope of PGW's service territory. To the extent that EDF seeks to address methane emissions in the context of the prioritized, cost-effective replacement of PGW's leaking pipes, that interest is already represented, as explained in Paragraph 11 above.

14. Admitted in part, denied in part. It is admitted that Petitioner is requesting the rights enumerated in Paragraph 14. It is denied that Petitioner has adequately established its right to intervene in this proceeding so as to warrant its status as a party entitled to such rights.

15. Paragraph 15 contains only EDF's service request and, therefore, requires no response.

**III. MOTION TO STRIKE THE DIRECT TESTIMONY OF SIMI ROSE GEORGE (In the alternative)**

**A. Introduction**

I&E incorporates, by reference, Paragraphs 1-13 of the introductory section that appears at the beginning of this document.

**B. Admissibility of Evidence**

Pursuant to the Commission's regulations, presiding officers are empowered to control the receipt of evidence and to rule upon the admission of such evidence.<sup>8</sup>

Presiding officers also have the authority to confine the evidence to the issues in the proceeding and to impose necessary limitations upon the admission of evidence.<sup>9</sup>

Furthermore, evidence will be excluded if it is either repetitious or cumulative or (2 ) if its probative value is outweighed by the danger of unfair prejudice, confusion of the issues, or considerations of undue delay or waste of time.

Written testimony is subject to the same rules of admissibility and cross-examining of the sponsoring witness as if it were presented orally,<sup>10</sup> but additional rules govern the appropriate procedure for the submission of written testimony. First, written testimony is required to contain line numbers in the left-hand margin on each page.<sup>11</sup>

Additional rules govern the actual filing of testimony. Specifically, the appropriate time period for a party to electronically file testimony with the Commission's Secretary's Bureau is within 30 days *after* the final hearing in an adjudicatory proceeding, absent

---

<sup>8</sup> 52 Pa. Code §5.403(a)(1).

<sup>9</sup> 52 Pa. Code §5.403(a)(2)(iv)

<sup>10</sup> 52 Pa. Code §

<sup>11</sup> 52 Pa. Code § 5.412

modification by a presiding officer.<sup>12</sup> Testimony that is not admitted into the record is not permitted to be electronically filed with the Commission.<sup>13</sup> Finally, if a party in an adjudicatory proceeding discovers that improper testimony documents have been electronically submitted to the Commission, that party may raise the improper submission with the presiding officer who will make a determination regarding the submission of improper testimony.<sup>14</sup>

### **C. Grounds for Motion to Strike**

#### **1. EDF's Direct Testimony is Procedurally Defective**

At the outset, EDF's Direct Testimony was untimely. Prehearing Order #1 set a receipt deadline for direct testimony at noon on October 19, 2015. I&E was not provided with a copy of EDF's direct testimony until 7:51 p.m. on October 19, 2015, after the close of Commission business, and almost eight hours after the service deadline expired. Accordingly, EDF's Direct Testimony contravenes Prehearing Order #1 as untimely, and it should be stricken from this expedited proceeding, where time is of the essence and any delay prejudices the parties.

Aside from the fact that EDF's Direct Testimony was untimely, it was also processed in a manner that violates the Commission's regulations. First, EDF failed to insert line numbers into its testimony, limiting the parties' and the ALJs' ability to reference specific portion of the testimony during the proceeding. Though this

---

<sup>12</sup> 52 Pa. Code § 5.412a(a) (emphasis added).

<sup>13</sup> 52 Pa. Code § 5.412a(b)(2)

<sup>14</sup> 52 Pa. Code §5.412a(e)

procedural defect is not fatal, it certainly compounds upon the already untimely receipt of the testimony. EDF's blatant disregard for Commission procedures and regulations is much more objectionable than that which may occur by an intervenor who is not familiar with Commission practice, because EDF has admittedly participated as an intervenor in at least six recent cases that were pending before the Commission.<sup>15</sup>

Of even greater concern is the fact that although parties are barred from electronically filing their written testimony with the Commission until after it is admitted to the record, on October 19, 2015, EDF filed its unadmitted Direct Testimony to the public docket of this case. EDF made the filing well before the November 2015 hearings were even set to occur, and before the active parties had the opportunity to object to the Direct Testimony or to cross-examine its sponsor, Simi Rose George. EDF's actions have deprived all active parties of record of their due process. As noted supra, the presiding officers have the authority to make a determination regarding the improper submission of testimony, and I&E respectfully requests that EDF's Direct Testimony be stricken from the record, in its entirety, and redacted from the Commission's electronic docket.

---

<sup>15</sup> EDF Motion for ProHac Vice, ¶3 (referencing its appearances in Dockets R-2015-2468981, R-2015-2469275, R-201402428742, R-2014-2428743, R-201402428744, and R-2014-2428745).

## **2. The Self-Described Scope and Purpose of EDF's Testimony Confuses the Issues in this Proceeding and Wastes Time**

On Page 3 of EDF's Direct Testimony, EDF poses the following question: "What is the purpose and scope of your testimony?" EDF replies that the purpose of its testimony is "to outline the multiple benefits to Pennsylvania's ratepayers, public safety and the environment that are likely to result from accelerating the rate of replacement of PGW's leak-prone gas infrastructure."<sup>16</sup> EDF fails to identify a purpose related to PGW's Petition which serves as a request to (1) waive the current Distribution System Improvement Charge ("DSIC") cap of 5% of distribution revenues and approve a maximum allowed DSIC of 7.5% with a total 10% cap including any reconciliations; (2) waive or suspend the requirements of Act 11 of 2012 to permit PGW to use an annual, levelized charge as the basis for establishing a DSIC, subject to a true-up based on PGW's actual experience; (3) waive the requirements of Act 11 to exempt PGW from paying interest on DSIC over-collections, and (4) authorize the filing, on one day's notice, of a revised Long Term Infrastructure Improvement Plan ("LTIIP"). Notably absent from EDF's stated purpose is any mention of or any recommendation related to any of the items requested in PGW's Petition.

On the contrary, the purported scope of EDF's testimony focuses on the benefits of PGW's acceleration of pipeline replacement, which is not an issue in the instant proceeding. This proceeding is not about whether PGW should accelerate its pipeline

---

<sup>16</sup> EDF Direct Testimony, p. 3.

replacement, as EDF's testimony presumes to address, but only about whether PGW's requests for waivers should be granted and the timetable of its revised LTIP.

Of even greater concern is the statement regarding EDF's motivation to intervene in this proceeding, which is to support another utility company's position in a New Jersey proceeding. According to the Direct Testimony, "EDF is intervening in this proceeding, broadly in support of PSE&G's petition, in order to ensure an economically efficacious outcome."<sup>17</sup> The petition that EDF references is the Public Service Electric & Gas Company's petition to accelerate its pipeline replacement filed before the New Jersey Board of Public Utilities.<sup>18</sup>

To be sure, EDF's purpose of using the instant proceeding to support its own position in an unrelated utility's petition pending in another state is a cause of great confusion, as it is axiomatic that EDF's testimony in a PGW case before the Commission should be based on an interest related to PGW and under the Commission's jurisdiction. Accordingly, EDF's Direct Testimony raises issues that are a colossal waste of time for the active parties, Your Honors, and the Commission, all of whom spend are spending a great deal of time and resources to resolve the actual issues pending in this expedited case. Accordingly, EDF's Direct Testimony should be stricken from the record, in its entirety, and redacted from the Commission's electronic docket.

---

<sup>17</sup> EDF Direct Testimony, p. 11.

<sup>18</sup> Id.

### **3. The EDF-focused Content on Pages 4- 8 is Not Relevant to This Proceeding**

Virtually all questions, and their corresponding responses, as appearing on the bottom of page 4 through the top of page 8 of EDF's Direct Testimony, have no specific bearing upon PGW<sup>19</sup>, but instead act to tout EDF's list of projects and research taking place across the United States. The questions include the following:

(1) "Has EDF performed any scientific research on methane leaks from natural gas distribution systems?"

(2) "Please provide a brief overview of the EDF-Google Methane Mapping Project."

(3) "In how many cities has EDF mapped methane leaks from natural gas distribution pipelines as part of this project? Please summarize key findings and implications for utilities' pipeline replacement programs."

Notably, in these four pages of testimony, EDF fails to make any connection between EDF's research and its recommendations regarding PGW's Petition. Later on in its Direct Testimony, EDF eventually forms an opinion and makes recommendations regarding PGW's Petition, but those assessments were based primarily upon the Staff Report, which EDF consistently reiterated as a source of support for its assertions and opinions. The extensive discussion of EDF's research is therefore not connected to the instant proceeding, is irrelevant, and it should be stricken from the record and redacted from the Commission's electronic docket.

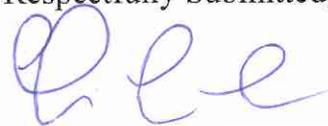
---

<sup>19</sup> None of Ms. George's responses to these questions are specific to PGW.

## CONCLUSION

WHEREFORE, for the reasons stated herein, the Bureau of Investigation and Enforcement respectfully requests that the Pennsylvania Public Utility Commission Deny the Environmental Defense Fund's Petition to Intervene in this proceeding. However, should the Commission Grant the Environmental Defense Fund's Petition to Intervene, the Bureau of Investigation and Enforcement respectfully requests that the Pennsylvania Public Utility Commission Strike the Environmental Defense Fund's Direct Testimony in this proceeding and remove it from the Commission's electronic docket.

Respectfully Submitted,



---

Carrie B. Wright  
Prosecutor  
PA Attorney ID #208185

Gina L. Lauffer  
Prosecutor  
PA Attorney I.D. #313863

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Post Office Box 3265  
Harrisburg, Pennsylvania 17105-3265

Dated: October 26, 2015