

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560

FAX (717) 783-7152  
consumer@paoca.org

November 17, 2015

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17120

Re: Petition of Philadelphia Gas Works for  
Approval to Establish a Distribution System  
Improvement Charge  
Docket No. P-2015-2501500

Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Reply Brief in the  
above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

A handwritten signature in cursive script that reads "Erin L. Gannon".

Erin L. Gannon  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 83487  
E-Mail: EGannon@paoca.org

Attachment

cc: Honorable Marta Guhl  
Honorable Christopher P. Pell

Certificate of Service

\*214185

CERTIFICATE OF SERVICE

Re: Petition of Philadelphia Gas Works :  
for Approval to Establish a Distribution : Docket No. P-2015-2501500  
System Improvement Charge :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Reply Brief, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 17<sup>th</sup> day of November 2015

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Gina L. Lauffer  
Carrie B. Wright  
Bureau of Investigation & Enforcement  
Pa Public Utility Commission  
400 North Street,  
Harrisburg, PA 17101

SERVICE BY EMAIL & FIRST CLASS MAIL, POSTAGE PAID

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

Sharon Webb  
Office of Small Business Advocate  
Suite 202, Commerce Building  
300 N. Second Street  
Harrisburg, PA 17101

Adeolu A. Bakare, Esquire  
McNees Wallace & Nurick, LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

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

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. 20009

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

Joseph Otis Minott, Esquire  
Ernest Logan Welde, Esquire  
Clean Air Council  
135 S. 19<sup>th</sup> Street, Suite 300  
Philadelphia, PA 19103



Erin L. Gannon  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 83487  
E-Mail: [EGannon@paoca.org](mailto:EGannon@paoca.org)

Darryl Lawrence  
Senior Assistant Consumer Advocate  
PA Attorney I.D. #93682  
Email: [DLawrence@paoca.org](mailto:DLawrence@paoca.org)

214190

Counsel for  
Tanya McCloskey, Acting Consumer  
Advocate  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor  
Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048