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March 14, 2016

Via Electronic Filing

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

Re: PA Public Utility Commission v. Philadelphia Gas Works – 1307(f)
Docket No. R-2016-2526700

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Prehearing Memorandum of Philadelphia Gas Works with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/dsc
Enclosure

cc: Cert. of Service (w/enc.)
Hon. Marta Guhl (w/enc.)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's Prehearing Memorandum upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email and First Class Mail

Aron Beatty, Esq.
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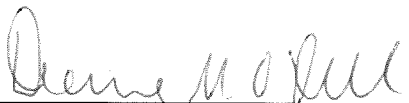
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Dated: March 14, 2016



Deanne O'Dell, Esq.

4. The Office of Small Business Advocate (“OSBA”) and the Office of Consumer Advocate (“OCA”) subsequently filed complaints. Per letter filed on March 10, 2016, PGW stated its intention not to file answers consistent with 52 Pa. Code § 5.61(d).

II. DISCOVERY

Consistent with the discovery modifications adopted in prior GCR proceedings, PGW proposes the following:

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

III. FACTUAL AND LEGAL ISSUES

This proceeding will focus on whether PGW's proposed 2016-2017 GCR and PGW's claimed realized 2015-16 natural gas expense, GCR Expense and prior years' over/undercollection are just, reasonable and consistent with the least cost fuel procurement and other standards set forth in 66 Pa.C.S. §§ 1307(f), 1317 and 1318. In addition, the proceeding will focus on whether PGW's proposed Tariff Supplement No. 65 to PGW Gas Supplier Tariff Pa P.U.C. No. 1 adjusting the load balancing charge and proposed Tariff Supplement No. 91 to PGW Gas Service Tariff Pa P.U.C. No. 2 adjusting the GCR, Price-to-Compare, Restructuring and Consumer Education Surcharge, Universal Service and Energy Conservation Surcharge, and Other Post Employment Benefit Surcharge are just, reasonable and otherwise consistent with law.

IV. SERVICE OF DOCUMENTS

PGW requests that all documents be served on:

Daniel Clearfield, Esquire
Attorney ID # 26183
Deanne M. O'Dell, Esquire
Attorney ID # 81064
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
717.237.6000

PGW also agrees to receive service of documents electronically in this proceeding. To the extent that materials are available electronically, it is requested that copies be served upon:

Daniel Clearfield – dclearfield@eckertseamans.com
Deanne O'Dell – dodell@eckertseamans.com

V. PROCEDURAL SCHEDULE

PGW proposes the schedule below for this proceeding (due dates via email by 4:30 P.M. unless otherwise noted). PGW has discussed this schedule with the other parties.

4/12/16	Other Parties Direct Testimony
4/25/16	Rebuttal Testimony
5/2/16	Surrebuttal Testimony
5/4/16 - 5/5/16	Evidentiary Hearings
5/12/16	Main Briefs Due
5/18/16	Reply Briefs Due

VI. WITNESSES

PGW expects to submit the testimony of the following witnesses:

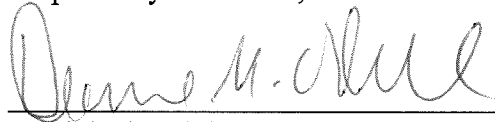
- Kenneth Dybalski, Director – Gas Planning and Rates at PGW. The issues Mr. Dybalski will address are set forth in his direct testimony dated March 1, 2016.
- Raymond Snyder, Senior Vice President of Gas Management at PGW. The issues Mr. Snyder will address are set forth in his direct testimony dated March 1, 2016.

PGW reserves its right to modify this witness list prior to the submission of testimony.

VII. SETTLEMENT

PGW is willing to participate in settlement discussions and will be initiating such discussion as soon as the parties indicate that they have had sufficient time to review PGW's claims on the GCR.

Respectfully submitted,



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Attorneys for Philadelphia Gas Works

Dated: March 14, 2016