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March 17, 2017

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works, Docket No. R-2017-2586783; **PETITION TO INTERVENE OF THE RETAIL ENERGY SUPPLY ASSOCIATION**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of The Retail Energy Supply Association in the above-captioned proceeding. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart
Counsel for
The Retail Energy Supply Association

TSS/jld
Enclosure

cc: Deputy Chief Administrative Law Judge Christopher P. Bell
Administrative Law Judge Marta Guhl
Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC AND FIRST CLASS MAIL


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Todd S. Stewart

DATED: March 17, 2017

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2017-2586783
	:	
Philadelphia Gas Works	:	

**PETITION TO INTERVENE
OF THE RETAIL ENERGY SUPPLY ASSOCIATION**

NOW COMES The Retail Energy Supply Association, (“RESA”)¹ by and through its counsel, Hawke McKeon & Sniscak, LLP, and hereby petitions to intervene in the above-captioned request for rate increase filed by Philadelphia Gas Works (“PGW”) on February 27, 2017. In its 2017 filing, PGW seeks approximately \$70 million increase in annual revenue and seeks to make certain other changes to its tariffs and operating procedures that will affect the service provided by the RESA members and other natural gas suppliers who provide service in the PGW service territory. RESA is concerned that if the rates in question and other practices are put into effect as proposed and certain current operational concerns are left unaddressed, that the competitive condition of the natural gas market in the PGW service territory, which is nearly non-existent for residential and small commercial customers, could be made worse, while the situation for

¹ The viewpoints expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

industrial customers, which currently is more robust, could be seriously deteriorated. Accordingly, RESA seeks to intervene in this proceeding and to participate fully as a party. In support of its request, RESA states and avers as follows:

1. RESA is a trade association of more than 20 competitive suppliers of energy, and has standing as an association, to represent the collective interest of its members in proceedings that address such issues; and, such participation is otherwise in the public interest. 52 Pa. Code § 5.41, *et seq.* RESA's unique interest, cannot adequately be represented by any other party. As discussed below, there are several competitive market concerns at issue in this proceeding, with the potential for more to be realized as discovery proceeds.

2. Representing the RESA in this proceeding is the following counsel:

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3. RESA's preliminary review of the filing shows that PGW intends to dramatically alter the rates, terms and conditions of interruptible service, a change which RESA opposes. RESA also notes that it does not appear that PGW is proposing to adjust the purchase of receivables ("POR") discount in this matter. RESA believes that the level and composition of the current POR discount is largely to blame for the almost complete lack of residential shopping, as the current discount is multiple times higher than the typical POR discount for natural gas utilities in Pennsylvania. Finally, RESA has concerns regarding the current operations of PGW that include: 1) failure to timely issue invoices; 2) DCQ delivery requirements; and, 3) missing usage

information. From RESA's perspective, these deficiencies should not be permitted to continue. RESA continues to review the filing and intends to present testimony on a variety of subjects.

WHEREFORE, RESA respectfully requests that its Petition to Intervene be granted and that it be afforded full party status in this matter.

Respectively submitted,



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DATED: March 17, 2017