



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

IN REPLY PLEASE  
REFER TO OUR FILE

June 26, 2017

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

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

Dear Secretary Chiavetta:

Please be advised that the Bureau of Investigation and Enforcement (I&E) supports the Motion to Strike Certain Portions of Testimony Submitted by Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (TURN) that was filed by Philadelphia Gas Works (PGW) on June 23, 2017. I&E agrees with PGW that page 17 line 12 through and including page 23 line 4 of the Surrebuttal Testimony submitted on behalf of TURN by Harry Geller should be stricken. The portions of the TURN testimony identified by PGW should have been included in TURN's case-in-chief and serve as nothing more than an opportunity for TURN to respond to the OCA Direct Testimony of Roger Colton and advance a new position. As noted by PGW, TURN indicates that it did not pursue these issues in direct or rebuttal testimony.

As such I&E believes it would be procedurally inappropriate to allow the contested portions of Mr. Geller's testimony into the record at this time.

Sincerely,

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

Erika L. McLain  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #320526

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Letter** dated June 26, 2017, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

**Served via Electronic and First Class Mail**

Daniel Clearfield, Esquire  
Deanne O’Dell, Esquire  
Karen Moury, Esquire  
Eckert Seamans  
213 Market Street  
Harrisburg, PA 17101

Kristine E. Marsilio, Esquire  
Harrison W. Breitman, Esquire  
Darryl A. Lawrence, Esquire  
Christy M. Appleby, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor Forum Place  
Harrisburg, PA 17101-1923

Josie B. H. Pickens, Esquire  
Robert W. Ballenger, Esquire  
Jennifer Collins, Esquire  
Community Legal Services, Inc.  
1410 West Erie Avenue  
Philadelphia, PA 19140

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

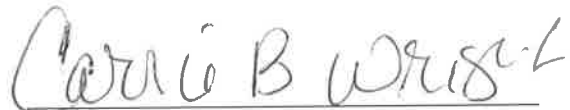
Mr. Robert D. Knecht  
Industrial Economics, Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140

Brandon J. Pierce, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Ave  
Philadelphia, PA 19122

Todd S. Stewart, Esquire  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101

Adeolu Bakare, Esquire  
Charis Mincavage, Esquire  
Alessandra L. Hylander, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

Patrick M. Cicero, Esquire  
Elizabeth R. Marx, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

A handwritten signature in cursive script that reads "Carrie B. Wright". The signature is written in black ink and is positioned above a horizontal line.

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

Erika L. McLain  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #320526