



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

Brandon J. Pierce, Esq.  
Senior Attorney | Legal Department  
Direct Dial: 215-684-6219  
E-mail: [Brandon.Pierce@pgworks.com](mailto:Brandon.Pierce@pgworks.com)

February 28, 2018

**VIA E-FILING AND FEDERAL EXPRESS**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
2<sup>nd</sup> Floor, 1 North  
400 North Street  
Harrisburg, PA 17120

**Re: Complaints of Office of Consumer Advocate and Office of Small Business  
Advocate re: Philadelphia Gas Works 2018-2019 Gas Cost Rate Filing;  
Docket No. R-2018-2645938; C-2018-2647156; C-2018-3000048**

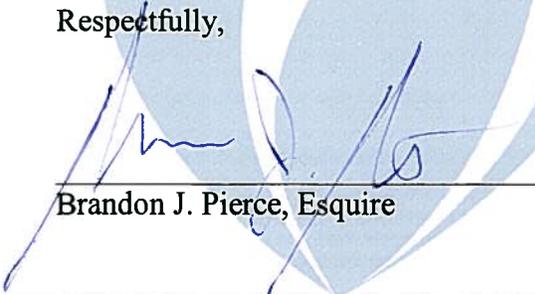
Dear Secretary Chiavetta:

The purpose of this letter is to notify you that, pursuant to 52 Pa Code § 5.61(d), this matter involves a rate proceeding and Philadelphia Gas Works ("PGW") is electing not to file formal answers to the complaints filed by the Office of Consumer Advocate ("OCA") and the Office of Small Business Advocate ("OSBA"), nor to any subsequently filed complaints.

On February 1, 2018, PGW submitted pre-filed information in support of its annual reconciliation of its purchased gas cost rate ("GCR") filing. On or about March 1, 2018, PGW will submit its definitive GCR filing to the Commission pursuant to Section 1307(f) of the Public Utility Code at Docket No. R-2018-2645938. The OSBA filed a Formal Complaint on February 12, 2018. The OCA filed a Formal Complaint on February 21, 2018.

Pursuant to 52 Pa. Code § 5.61(d), PGW has elected to not answer complaints as it views them as complaints in a rate proceeding. Please contact me if the Commission takes a different view and believes that the complaints in this proceeding should be answered.

Respectfully,



Brandon J. Pierce, Esquire

cc: Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of PGW's Letter to the Secretary regarding answering complaints upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**VIA FIRST CLASS MAIL and EMAIL**

Aron J. Beatty, Esq.  
Christy M. Appleby, Esq.  
Harrison W. Breitman, Esq.  
Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place Bldg.  
555 Walnut Street  
Harrisburg, PA 17101-1921  
[abeatty@paoca.org](mailto:abeatty@paoca.org)  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[hbreitman@paoca.org](mailto:hbreitman@paoca.org)

Sharon Webb, Esq.  
Office of Small Business Advocate  
Commerce Building, Suite 202  
300 North 2<sup>nd</sup> Street  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)

Gina Miller, Esq.  
Bureau of Investigation & Enforcement  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)

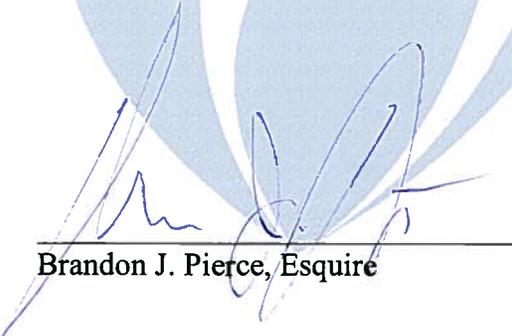
Robert W. Ballenger, Esq.  
Energy Unit  
Community Legal Services, Inc.  
North Philadelphia Law Center  
1410 West Erie Avenue  
Philadelphia, PA 19102  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)

Dated: February 28, 2018

Charis Mincavage, Esq.  
Adelou Bakare, Esq.  
Alessandra L. Hylander, Esq.  
McNEES, WALLACE, NURICK  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mwn.com](mailto:cmincavage@mwn.com)  
[ABakare@mwn.com](mailto:ABakare@mwn.com)  
[ahylander@mwn.com](mailto:ahylander@mwn.com)

Jerome D. Mierzwa  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway  
Columbia, MD 21044  
[jmierzwa@exeterassociates.com](mailto:jmierzwa@exeterassociates.com)

Robert Knecht  
Industrial Economics, Incorporated  
2067 Massachusetts Ave.  
Cambridge MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)



Brandon J. Pierce, Esquire