



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

March 18, 2019

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

Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
1307(f)
Docket No. R-2019-3007636

Dear Secretary Chiavetta:

Enclosed please find the Bureau of Investigation & Enforcement's (I&E)
**Expedited Motion to Strike Certain Portions of Philadelphia Gas Works' Gas Cost
Rate Filing** for the above-captioned proceeding.

Copies are being served on all active parties of record. If you have any questions,
please contact me at (717) 787-8754.

Sincerely;

Gina L. Miller
Prosecutor
Bureau of Investigation & Enforcement
PA Attorney I.D. No. 313863

GLM/seb
Enclosure

cc: Honorable Marta Guhl (ALJ, PUC Philadelphia)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2019-3007636
	:	
Philadelphia Gas Works 1307(f)	:	

NOTICE TO PLEAD

To: *Brandon J. Pierce, Esq., and Deanne O'Dell, Esq., Counsel for Philadelphia Gas Works*

You are hereby notified to file a written response to the attached Expedited Motion of the Bureau of Investigation and Enforcement to Strike Certain Portions of Philadelphia Gas Works' Gas Cost Rate Filing in the form and manner as directed by the presiding officers. If you do not file a written response to I&E's Motion, the presiding officers may rule in favor of I&E on the attached Motion without a hearing.

All pleadings, such as answers to motions, must be filed with the Secretary of the Pennsylvania Public Utility Commission:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

You must also serve a copy of your response on the undersigned prosecutor.



Gina L. Miller, Prosecutor
PA Attorney ID No. 313863

Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120

March 18, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2019-3007636
	:	
Philadelphia Gas Works 1307(f)	:	

**THE BUREAU OF INVESTIGATION & ENFORCEMENT’S
EXPEDITED MOTION TO STRIKE CERTAIN PORTIONS OF PHILADELPHIA GAS
WORKS’ GAS COST RATE FILING**

TO ADMINISTRATIVE LAW JUDGE MARTA GUHL:

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) respectfully requests that the portions of Philadelphia Gas Works’ (“PGW”) gas cost rate filing referencing PGW’s proposal for establishing Rate LNG-N, as submitted on March 1, 2019, be stricken. More specifically, the portions at issue are identified as follows: (1) the portions of PGW Statement No. 2, the direct testimony of Raymond M. Snyder, identified as page 12, line 18 through page 16, line 15; and (2) Exh. RMS-2. As explained further below, the basis for I&E’s Motion is three-fold: (1) PGW’s proposal for Rate LNG-N is beyond the scope of this proceeding and therefore irrelevant to this case; (2) permitting PGW’s rate LNG-N proposal to be considered for approval in this proceeding will unfairly prejudice its ratepayers; and (3) inclusion of Rate LNG-N confuses the issue in

this gas cost rate proceeding. Accordingly, the portions of PGW's filing that support Rate LNG-N, as referenced above, should be stricken from this case.

Additionally, I&E respectfully requests expedited consideration of this Motion. An expedited resolution to this Motion is essential because I&E's direct testimony will be due to be served by mid-April of 2019,¹ and the determination of whether the materials at issue must be addressed in the scope of this proceeding will impact both the content and structure of I&E's direct testimony, as well as I&E's litigation strategy for this case. Finally, an expedited resolution will promote order and certainty in this case for all parties and it will preserve clarity of the record. In support of this Motion, I&E avers as follows:

I. PROCEDURAL HISTORY

1. On February 1, 2019, Philadelphia Gas Works ("PGW") filed its prefiling information in support of its annual reconciliation of purchased gas costs rates.
2. On February 5, 2019, I&E filed a Notice of Appearance in this proceeding.
3. On February 8, 2019 and February 11, 2019, respectively, the Office of Small Business Advocate and the Office of the Consumer Advocate filed a Public Statement, a Notice of Appearance and a formal Complaint in this case.
4. On February 19, 2019, the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") filed a Petition to Intervene in this case.

¹ Although this Motion predates the Prehearing Conference in this case, and therefore the establishment of the litigation schedule setting the due date for service of direct testimony, I&E has continually participated in PGW's annual gas cost rate proceeding and the date adopted for the service of direct testimony has historically been between early and mid-April.

5. On March 1, 2019, PGW made its Annual Purchase Gas Cost Rate (“GCR”) filing in accordance with Section 1307(f) of the Public Utility Code (“Code”), which establishes a procedure for recovery of purchased gas expenses by public utilities.

6. On March 8, 2019, I&E’s counsel contacted PGW’s counsel by telephone to discuss I&E’s position that PGW’s proposal for Rate LNG-N was not appropriate for consideration in this case. PGW’s counsel disagreed with I&E’s position. On March 15, 2019, I&E’s counsel again contacted PGW’s counsel by telephone to again advise of I&E’s position and to advise PGW that I&E attended to file the instant Motion and to request that it be considered on an expedited basis.

7. Although I&E’s counsel has now acted to ensure that its ability to obtain the requested relief is not compromised, counsel for both I&E and PWSA have agreed to continue exploring resolutions to this dispute while this Motion is pending.

8. At the time of this Motion, PGW’s annual GCR filing is set for a telephonic Prehearing Conference on March 27, 2019, with Administrative Law Judge Marta Guhl presiding.

II. THE LIMITED SCOPE OF SECTION 1307(F) PROCEEDINGS

9. Issues that do not involve gas costs are beyond the scope of Section 1307(f) proceedings.²

² *Pennsylvania Public Utility Commission v. UGI Utilities*, R-00016376, 2001 WL 36260400, at *1 (Nov. 9, 2001) (rejecting UGI’s proposal for a System Access Fee rate as part of its 1307f case and deferring it to a base rate proceeding because the fee was a rate design issue and not a gas cost issue).

10. As a jurisdictional natural gas distribution company with gross intrastate annual operating revenues in excess of \$40 million, PGW must comply with the Commission's regulation that limits the issues and proposals that may be raised in its Section 1307(f) gas cost rate filing.³

11. In the event that PGW elects to propose any rate structure or rate allocation changes in its Section 1307(f) proceeding, it is obligated to provide "a detailed explanation of each proposal, reasons therefore, number of customers affected, net effect on each customer class, and **how the change relates to or is justified by changes in gas costs** proposed in the Section 1307(f) tariff filing."⁴

III. PGW'S PROPOSAL FOR RATE LNG-N

12. PGW's existing rate LNG was proposed in its 2009 base rate case.⁵ Ultimately, the parties to PGW's 2009 base rate case resolved to approve rate LNG through their settlement of that proceeding;⁶ thereafter, the Commission adopted the terms of that settlement, culminating in the approval of Rate LNG.⁷

13. Now, as part of this GCR filing, PGW proposed to make a change to a non-GCR tariff provision⁸ to eliminate rate LNG and replace it with a new provision. Specifically, by way of its proposal for Rate LNG-N, PGW seeks to replace Rate LNG

³ 52 Pa. Code § 53.64.

⁴ Id. at § 53.64(c)(11) (emphasis added).

⁵ *Pennsylvania Public Utility Commission v. Philadelphia Gas Works*, R-2009-2139884, St. No. 5, p. 2, ln 9; p. 7, ln. 20-p. 8, ln. 18.

⁶ *Pennsylvania Public Utility Commission v. Philadelphia Gas Works*, R-2009-2139884, Joint Petition for Settlement, p. 4, ¶ 15.

⁷ *Pennsylvania Public Utility Commission v. Philadelphia Gas Works*, R-2009-2139884, Opinion and Order (July 29, 2010).

⁸ PGW St. No. 2, p. 12, ln. 19-23.

with Rate LNG-N in order to “expand its existing liquified natural gas (“LNG”) services tariff so that it will accommodate a full range of LNG-related services.”⁹

14. The portions of PGW’s Section 1307(f) filing which address Rate LNG-N include the following: (1) the portions of PGW Statement No. 2, the direct testimony of Raymond M. Snyder identified as p. 12, line 18 through page 16; and (2) and an exhibit identified as Exh. RMS-2 which contains a proposed tariff for Rate LNG-N.

Collectively, I&E will refer to these portions of PGW’s Section 1307(f) filing as the “LNG-N materials.”

15. PGW’s testimony explains that at its Richmond facility, it can presently liquefy natural gas purchased by PGW, store the liquified natural gas, and then offload the gas in liquid form, via transport vehicle, to a customer. Therefore, the current tariff in place, Rate LNG, is limited to PGW’s provision of PGW-supplied liquified gas. However, PGW indicates that Rate LNG-N would expand the services that it could offer to include liquefaction of gas provided by other parties, which could then be stored for an agreed period of time, and then delivered through the pickup of LNG through transport vehicle, pipeline, or by an exchange service.¹⁰

16. PGW anticipates that sales and services encompassed within Rate LNG-N could include (1) the provision of the commodity; (2) transportation of natural gas from the Company’s City Gate to the Company’s Liquified Natural gas facilities; (3) the liquefaction of the natural gas by the Company’s Liquified Natural Gas facilities; (4) the

⁹ PGW St. No. 2, p. 12, ln. 19-23.

¹⁰ PGW St. No. 2, p. 13.

injection of the Customer's liquified natural gas into the Company's Liquified Natural Gas facilities; (5) the storage of liquified natural gas; (6) the vaporization of liquified natural gas; (7) the withdrawal of the liquified natural gas via transport vehicle; and (8) the delivery of commodity from the Company's Liquified Natural Gas facilities via pipeline, exchange services, or other delivery mechanism.¹¹

17. PGW indicates that the rates charged under Rate LNG-N will be negotiated, but must be economically advantageous to PGW, as determined by PGW in its sole discretion.¹²

18. PGW indicates that the treatment of revenues under Rate LNG-N will depend on the party that supplies the LNG or natural gas commodity. For customers who supply their own LNG or natural gas commodity, PGW will only be supplying services; therefore, PGW proposes to record resulting revenues in its "Other Revenues" account to be included in the calculation of its base rate proceedings. However, if PGW supplies the commodity, it proposes to include revenue from the sale of the commodity in the computation of the GCR, with the caveat that if in liquified form, there will be an additional charge for the liquefaction of the natural gas to be recorded in PGW's base rate proceedings.¹³

¹¹ Id. at pp. 13-14.

¹² Id. at 14.

¹³ Id. at 15.

19. PGW asserts that proposed Rate LNG-N is different than PGW's existing Rate LNG in that Rate LNG-N in that it would authorize PGW to provide a full-range of LNG-related services as the market is demanding.¹⁴

20. PGW claims that "[s]ince part of Rate LNG-N relates to commodity sales by PGW, it is reasonable and appropriate for PGW to propose Rate LNG-N as part of a GCR proceeding."¹⁵ However, as part of its GCR filing, PGW included a proposed tariff for Rate LNG-N which contemplates charges that are separate and apart from commodity charges,¹⁶ and it admits that the tariff at issue is a non-GCR tariff.¹⁷

21. PGW's Rate LNG-N proposal fails to adhere to the Code and the Commission's regulations because it does not relate to, nor is it justified by, changes in gas costs.¹⁸

IV. MOTION TO STRIKE PGW'S INCLUSION OF THE LNG-N MATERIALS IN THIS PROCEEDING

A. Introduction

I&E incorporates, by reference, Paragraphs 1-21 above. As explained further below, the basis for I&E's Motion is three-fold: (1) PGW's proposal for Rate LNG-N is beyond the scope of this proceeding and therefore irrelevant to this case; (2) permitting PGW's Rate LNG-N proposal to be considered for approval in this proceeding will unfairly prejudice its ratepayers; and (3) inclusion of Rate LNG-N

¹⁴ Id. at 16.

¹⁵ Id. at 15.

¹⁶ PGW Exh. RMS-2.

¹⁷ PGW St. No. 2, p. 12.

¹⁸ 66 Pa. C.S. § 1307(f), (h); 52 Pa. Code § 53.64(c)(11)

confuses the issue in this gas cost rate proceeding. I&E submits that each of the three grounds provides an independent and viable basis for striking the Rate LNG-N materials from this proceeding; however, the combined weight of these grounds makes it clear that the Rate LNG-N materials must be stricken from this case.

B. Admissibility of Evidence

Your Honor has authority pursuant to 66 Pa. C.S. §331(d) and 52 Pa. Code §5.103(d) to rule upon the instant motion. Pursuant to the Commission’s regulations, presiding officers are empowered to control the receipt of evidence and to rule upon the admission of such evidence.¹⁹ Presiding officers also have the authority to confine the evidence to the issues in the proceeding and to impose necessary limitations upon the admission of evidence.²⁰ As a matter of public policy, evidence that is irrelevant or immaterial should be excluded.²¹ Furthermore, evidence will be excluded under certain circumstances, including if its probative value is outweighed by the danger of unfair prejudice, confusion of the issues, or considerations of undue delay or waste of time.

C. Grounds for Motion to Strike

1. PGW’S Rate LNG-N Proposal Is Beyond The Scope of this Proceeding and Therefore Irrelevant to this Case

As set forth above, PGW filed this case pursuant to Section 1307(f) of the Code. PGW’s Section 1307(f) filing must be made annually to account for the adjustment and reconciliation of its natural gas cost recovery rates. As a jurisdictional natural gas

¹⁹ 52 Pa. Code § 5.403(a)(1).

²⁰ 52 Pa. Code §§ 5.403(a)(2)(iv) and §5.483(a).

²¹ 66 Pa. C.S. § 332(b).

distribution company with gross intrastate revenues in excess of \$40,000,000, through its 1307(f) filing, PGW is permitted to file tariffs reflecting actual and projected increases or decreases in its natural gas costs to become effective six months from the data of filing.²² At the heart of a Section 1307(f) function is reconciliation of gas costs; however, PGW's proposal to use this proceeding as a venue to make a change to include non-gas cost rate tariff provisions has no basis in gas costs. On the contrary, PGW proposes to rely upon Rate LNG-N to expand the services it is permitted to offer beyond costs related to selling natural gas to customers, contrary to the scope of a §1307(f) proceeding.²³ Rate LNG-N will allow PGW to charge rates so third parties can use PGW's facilities to transport, liquefy, inject, store, vaporize, withdraw, and deliver their own natural gas for sale.²⁴ Essentially, rate LNG-N will allow third-parties to "rent" PGW's facilities for their own use in manufacturing and selling LNG. The fact that Rate LNG-N includes these services places it beyond the scope of this Section 1307(f) case.²⁵

The fact that Rate LNG-N is not a commodity-based rate is further exemplified by the fact that PGW has failed to comply with a key Commission regulation that limits the scope of proposals that may be raised in Section 1307(f) proceedings to those associated with changes in gas costs. Specifically, the Commission requires that any utility proposing rate structure or rate allocation changes in its Section 1307(f)

²² 66 Pa. C.S. § 1307(f)(1).

²³ See 66 Pa. C.S. §1307(h) (definition of "natural gas costs" and "gas costs" under 66 Pa. C.S. §1307 include "the direct costs paid by a natural gas distribution company for the purchase and the delivery of natural gas to its system in order to supply its customers").

²⁴ PGW St. No. 2, p. 13; Exh. RMS-2.

²⁵ *Pennsylvania Public Utility Commission v. UGI Utilities*, R-00016376, 2001 WL 36260400, at *1 (Nov. 9, 2001).

proceeding is obligated to explain how the change relates to, or is justified by changes in gas costs proposed in the Section 1307(f) tariff filing.²⁶ In this case, instead of providing any explanation of how Rate LNG-N is related to or is justified by changes in gas costs, PGW simply alleges that “[s]ince part of Rate LNG-N related to commodity sales by PGW, it is reasonable and appropriate for PGW to propose Rate LNG-N as part of a GCR proceeding.”²⁷ To the contrary, PGW concedes that only *part* of Rate LNG-N is related to commodity sales. Importantly, PGW does not explain why the portions of Rate LNG-N *not* related to commodity sales are appropriate for a 1307(f) proceeding.

I&E submits that any relationship between Rate-LNG-N, which appears to be mainly or entirely predicated upon PGW’s provision of services, and commodity sales is tenuous at best. However, while I&E will further discuss the service basis underlying Rate LNG-N below, assuming *arguendo*, that Rate LNG-N has any relationship to commodity sales, PGW’s claim is still insufficient because it has failed to explain how Rate LNG-N is related to or justified *by changes in gas costs*. Accordingly, as Rate LNG-N is not within the scope of this proceeding, the LNG-N materials are irrelevant and they should be stricken from consideration in this case.

2. Permitting PGW’s Rate LNG-N Proposal to Be Considered for Approval in this Proceeding Will Unfairly Prejudice its Ratepayers

PGW’s attempt to seek approval of Rate LNG-N in this 1307(f) case will unfairly prejudice PGW’s ratepayers because it will deprive them of the benefit of a full

²⁶ Id. at § 53.64(c)(11).

²⁷ PGW St. Np. 2, p. 15, ln. 15-20.

investigation of the rate proposal as is necessary to determine whether it is just and reasonable. Importantly, as explained above, PGW proposed its existing Rate LNG, which it now proposes to extinguish and replace with Rate LNG-N, in its 2009 base rate case and not through a gas cost rate proceeding. Although it is unclear why PGW now chooses to depart from making its new proposal through a base rate case, as is appropriate, its attempt to circumvent the base rate case venue offends the Code.

Specifically, the Code requires that every rate made, demanded, or received by a public utility shall be just and reasonable, and in conformity with regulations or orders of the commission.²⁸ In this case, PGW's proposed Rate LNG-N, which would vastly expand the services that PGW could begin to supply, is likely to produce some rate impact, implicating the need for further review in a base rate proceeding. More specifically, approval of Rate LNG-N would permit PGW to begin to provide a host of new services, including PGW's liquefaction of gas supplied by other parties, the injection of customers' liquified natural gas into PGW's facilities, PGW's delivery of other parties' commodity from its facilities via pipeline, exchange services, or other delivery mechanism.²⁹ While PGW has made it clear that its list of services will be expanded, it has provided no information regarding the cost impact of its provision of the additional services. I&E submits that the vast expansion of service that PGW seeks to provide through Rate LNG-N will undoubtedly require PGW to expend resources and devote its property to uses that extend beyond those required under existing Rate LNG and to

²⁸ 66 Pa. C.S. § 1301.

²⁹ PGW St. No. 2, pp. 13-14.

produce revenue beyond that contemplated in Rate LNG. It is unclear how Rate LNG-N may impact PGW's ratepayers that do not take service under Rate LNG-N, especially in the event that PGW's increased use of resources and equipment to provide service under Rate LNG-N is being subsidized by those ratepayers.

Finally, a greater level of review than is available in this case is warranted here because service under Rate LNG-N would only be available to customers that have negotiated an agreement with PGW regarding LNG sales and services.³⁰ However, it does not appear that PGW proposes to permit the Commission to review these agreements. Instead, PGW is essentially asking that through this annual gas reconciliation case, the Commission permit it to implement Rate LNG-N without any information about the rates involved other than that the agreements that underlie them "must be advantageous to PGW, as determined by PGW in its sole discretion."³¹ I&E disputes that such action is appropriate.

In summary, I&E has significant concerns about the basis for the rates that PGW will charge under Rate LNG-N, whether the amount charged will be appropriately tracked and reconciled, and whether other PGW ratepayer funding will be diverted to subsidize the expanded service that PGW now seeks to provide. The questions implicated are far outside the scope of this proceeding; however, they are appropriate questions that should be addressed in a base rate proceeding in order to ensure that PGW's ratepayers are not unduly prejudiced by any approval of Rate LNG-N without the

³⁰ PGW St. No. 2, p. 13.

³¹ PGW St. No. 2, p. 14.

appropriate level of scrutiny in the appropriate venue. Accordingly, consideration of Rate LNG-N in this proceeding, by way inclusion of PGW's LNG-N materials in this case, would unduly burden PGW's customers; therefore, the LNG-N materials should be stricken from this case.

3. Inclusion of Rate LNG-N Confuses the Issue in this Gas Cost Rate Proceeding

Because PGW's Rate LNG-N proposal is predicated upon the expansion of the types of liquified natural gas services that PGW hopes to provide in the future, considering it for approval in the context of this proceeding would confuse the issues that are appropriate for resolution here. The confusion that would result from inclusion of Rate LNG-N in this case is exemplified by the fact that the Commission's determination in this Section 1307(f) proceeding will be limited to whether PGW's gas cost rates are just and reasonable. Since Rate LNG-N is not related to and is not justified by gas costs, considering it within the scope of this case will confuse the issue of whether PGW's gas cost rates are just and reasonable.

By way of further illustration, the standards that the Code prescribes for approval of gas cost rates do not translate to rates that are being proposed for provision of services like Rate LNG-N. Pursuant to the Code, the Commission may determine that a utility's gas cost rates are just and reasonable "if the commission finds that the utility is pursuing a least cost fuel procurement policy, consistent with the utility's obligation to provide

safe, adequate and reliable service to its customers.”³² In order to make such a determination, the Commission must make specific findings, including that the (1) the utility has fully and vigorously represented the interests of its ratepayers in proceedings before the Federal Energy Regulatory Commission; (2) the utility has taken all prudent steps necessary to negotiate favorable gas supply contracts and to relieve the utility from terms in existing contracts with its gas suppliers which are or may be adverse to the interests of the utility's ratepayers; (3) the utility has taken all prudent steps necessary to obtain lower cost gas supplies on both short-term and long-term bases both within and outside the Commonwealth, including the use of gas transportation arrangements with pipelines and other distribution companies; and (4) the utility has not withheld from the market or caused to be withheld from the market any gas supplies which should have been utilized as part of a least cost fuel procurement policy.³³

As illustrated through the above review of the findings necessary to support the Commission’s approval of a utility’s gas cost rate, the common thread of all the necessary findings is that they all encompass a determination regarding gas costs. In this case, Rate LNG-N has only a tenuous connection to gas costs, as only one of the eight services it encompasses is the provision of commodity. The remaining seven services that PGW plans to provide through Rate LNG-N all involve services that PGW proposes to provide such as transportation, liquefaction, injection, storage, vaporization,

³² 66 Pa. C.S. § 1318(a).

³³ Id. at § 1318(a)(1)-(a)(4).

withdrawal, and delivery of natural gas.³⁴ Under these facts, permitting Rate LNG-N to be considered as part of this proceeding would confuse the issue of gas costs with issues regarding the costs associated with PGW's performance of the services that largely compromise Rate LNG-N. Simply put, the purpose of this proceeding is not to approve PGW's proposal to implement a new rate that is intended to expand the pool of services that it is permitted to provide. Accordingly, the inclusion of PGW's LNG-N materials confuses the issue of whether PGW's gas costs are just and reasonable by inserting unrelated issues into the case that are not ripe for resolution here; therefore, they should be stricken from this case.

³⁴ PGW St. No. 2, p. 14.

CONCLUSION

WHEREFORE, for the reasons stated herein, I&E respectfully requests that the Pennsylvania Public Utility Commission Strike the following portions of PGW's gas cost rate filing: (1) the portions of PGW Statement No. 2, the direct testimony of Raymond M. Snyder identified as page 12, line 18 through page 16, line 15; and (2) the Exhibit identified as Exh. RMS-2. Additionally, I&E respectfully requests expedited consideration of this Motion. An expedited resolution to this Motion is essential because I&E's direct testimony will be due to be served by mid-April of 2019, and the determination of whether the materials at issue must be addressed in the scope of this proceeding will impact the content and structure of I&E's direct testimony, as well as I&E's litigation strategy for this case. Finally, an expedited resolution will promote order and certainty in this case for all parties and it will preserve clarity of the record

Respectfully Submitted,



Gina L. Miller
Prosecutor
PA Attorney I.D. #313863

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17120

Dated: March 18, 2019

Pennsylvania Public Utility Commission :
:
v. :
:
Philadelphia Gas Works 1307(f) :

Docket No. R-2019-3007636

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Motion to Strike** dated March 18, 2019, 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 First Class and Electronic Mail

Brandon J. Pierce, Esq.
Philadelphia Gas Works
800 W. Montgomery Ave.
Philadelphia, PA 19122
brandon.pierce@pgworks.com

Adelou Bakare, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
abakare@mwn.com

Sharon Webb, Esq.
Office of Small Business Advocate
300 North Second Street
Commerce Building, Suite 202
Harrisburg, PA 17101
swebb@pa.gov

Deanne O'Dell, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com

Christy M. Appleby, Esq.
Harrison W. Breitman, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101
cappleby@paoca.org
hbreitman@paoca.org



Gina L. Miller
Prosecutor
Bureau of Investigation & Enforcement
PA Attorney I.D. No. 313863