



**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)

March 29, 2019

**VIA 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

RECEIVED

MAR 29 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

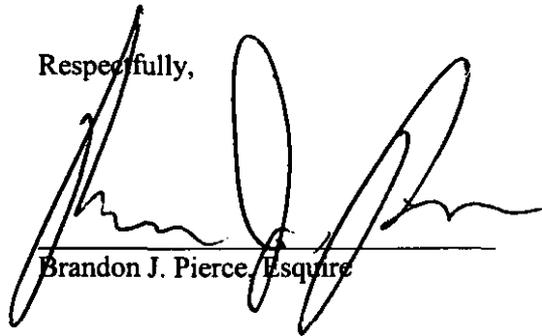
**Re: Philadelphia Gas Works 2019-2020 Gas Cost Rate Filing  
Docket No. R-2019-3007636**

Dear Secretary Chiavetta:

On behalf of Philadelphia Gas Works ("PGW"), by this letter, PGW withdraws the proposed expansion of PGW's tariffed Liquefied Natural Gas ("LNG") services from this proceeding.

Consistent with the Interim Order dated March 26, 2019,<sup>1</sup> and for purposes of clarification, PGW hereby identifies the following portions of PGW's gas cost rate filing as being removed and stricken from this proceeding: PGW Statement No. 2, the Direct Testimony of Raymond M. Snyder at page 2, line 3; at page 12, line 18 through page 16, line 15; and Exhibit RMS-2. PGW has attached a revised copy of Statement No. 2 to this letter reflecting those deletions. Copies are to be served in accordance with the attached Certificate of Service. Please contact me if you have any questions.

Respectfully,



Brandon J. Pierce, Esquire

Enclosure

cc: Hon. Marta Guhl w/ enc.  
Certificate of Service w/ enc.

<sup>1</sup> <http://www.puc.state.pa.us/pcdocs/1612073.docx>

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**DIRECT TESTIMONY OF**

**RAYMOND M. SNYDER**

**ON BEHALF OF  
PHILADELPHIA GAS WORKS**

**Docket Number R-2019-3007636**

**Philadelphia Gas Works  
Proposed 2019 Annual GCR Adjustment**

**March 1, 2019**

**RECEIVED**

**MAR 29 2019**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND CURRENT POSITION WITH PGW.**

3 A. My name is Raymond M. Snyder. My position with PGW is Senior Vice President of  
4 Gas Management.

5 **Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.**

6 A. I received a Bachelor of Science degree in Civil Engineering from Pennsylvania State  
7 University in 1979. I have also received a Masters in Engineering Management from  
8 Drexel University in 1988. I am a registered Professional Engineer in Pennsylvania.  
9 I have held the following positions at PGW: Engineering Assistant; Assistant Staff  
10 Engineer; Staff Engineer; Senior Staff Engineer; Assistant Manager, Engineering;  
11 Manager, Engineering; Director, Operations Systems Administration; Director, Gas  
12 Processing; and Vice President, Gas Management.

13 **Q. HAVE YOU EVER PROVIDED TESTIMONY BEFORE THIS COMMISSION?**

14 A. Yes. I submitted testimony for the PGW 1307f Annual GCR Filings in Docket Nos. R-  
15 2013-2346376, R-2014-2404355, R-2015-2465656, R-2016-2526700,  
16 R-2017-2587526 and R-2018-2645938.

17 **Q. WHAT IS THE FOCUS OF YOUR TESTIMONY IN THIS PROCEEDING?**

18 A. My testimony discusses:

- 19 • PGW's gas purchasing policies and strategies applicable to FY 2020 (September  
20 1, 2019 through August 31, 2020) and FY 2019 (September 1, 2018 through  
21 August 31, 2019);
- 22 • PGW's design day requirement;
- 23 • Capacity release, off-system sales and asset management fee sharing;
- 24 • Price analysis and buying advisory service;

- 1 • Choice supplier capacity release charges;
- 2 • Monthly imbalance reconciliation procedures; and

3  
4  
5 **Q. PLEASE PROVIDE A GENERAL DESCRIPTION OF PGW'S GAS**  
6 **DISTRIBUTION SYSTEM.**

7 A. PGW's gas distribution system is located in Southeastern Pennsylvania in the County and  
8 City of Philadelphia. Since this is not a gas-producing area, PGW and its natural gas  
9 customers are dependent upon the interstate natural gas pipeline system to deliver natural  
10 gas into the PGW gas distribution system. PGW relies on the interstate pipeline for all  
11 natural gas supply, storage, and transportation services, except for PGW's own on-system  
12 peak shaving facilities. PGW owns and operates two LNG facilities that are used  
13 primarily both to meet intraday, daily and seasonal supply needs as well as to meet peak  
14 day requirement.

15 **Q. PLEASE IDENTIFY PGW'S CURRENT INTERSTATE SUPPLIERS.**

16 A. Spectra Energy's Texas Eastern Transmission pipeline and Williams' Transco Gas  
17 Pipeline comprise the two interstate natural gas pipelines that deliver gas to PGW's city  
18 gates. In addition, PGW uses off-system natural gas storage services to meet winter peak  
19 requirements.

20  
21 **II. GAS PURCHASING POLICIES AND SUPPLY STRATEGY**

22 **Q. DOES PGW UTILIZE A LEAST-COST PROCUREMENT POLICY IN ITS GAS**  
23 **PURCHASING POLICIES AND SUPPLY STRATEGY?**

24  
25 A. Yes.

26 **Q. PLEASE DESCRIBE PGW'S SUPPLY STRATEGY.**

1 A. PGW's supply strategy<sup>1</sup> (which is currently being used during the FY 2019 GCR period  
2 and which the Company intends to use for the FY 2020 GCR period) is a portfolio  
3 approach in both contract structure and pricing. The portfolio approach of purchasing gas  
4 supply allows PGW to remove some of the volatility in purchasing natural gas supplies  
5 for its ratepayers. Without the use of the portfolio approach, firm ratepayer would be  
6 totally at the mercy of market volatility.

7 The Company's gas supply portfolio is divided into four distinct categories: (1)  
8 daily index price swing contracts; (2) physical forward purchased contracts; (3) storage;  
9 and (4) LNG.

10 (1) The advantage of daily index priced swing contracts are their operational  
11 flexibility which allows PGW to increase or decrease the volume in response to changes  
12 in sendout requirements. During certain time periods, these types of contracts also  
13 provide security of supply.

14 (2) The Company enters into physical forward purchased contracts for summer  
15 and winter baseload supplies. These contracts permit the Company to make discretionary  
16 physical forward purchases on a year-round basis.

17 (3) The Company utilizes storage fields which act as additional sources of supply.  
18 The gas procured under these contracts also act as a physical fixed price counter to  
19 market conditions.

20 (4) The Company operates its own LNG peak shaving liquefaction, vaporization,  
21 and storage facilities.

---

<sup>1</sup> All natural gas supply strategies are presented to the Company's internal Supply Committee for review and approval. The Supply Committee is comprised of senior corporate management as well as Gas Supply, Gas Planning and Regulatory departmental management. The Supply Committee meets monthly.

1           Spectra Energy and Williams Gas Pipeline represent the only interstate pipeline  
2 facilities with physical connections to the PGW service territory. As a result, all of  
3 PGW's supply contracts utilize these pipelines and the contracts also recognize pipeline  
4 receipt and delivery rights. These contracts contain the ability to "lock up" the price for  
5 upcoming months or to have the pricing default to an agreed upon market index if there is  
6 no market advantage in fixing a price before the month begins. As a result, PGW not  
7 only ensures security of supply from the pipelines but also can take advantage of varying  
8 basis differentiated pricing in the market. This differentiated pricing results from the fact  
9 that all shippers of natural gas receive their gas at varying locations along the pipeline.  
10 PGW uses a city-gate delivered price in comparing the various alternatives available.  
11 The city gate delivered price is computed considering the "into the pipe price of gas" plus  
12 all incremental charges levied by the transporting pipeline to deliver the gas to the city  
13 gate. These prices include, but are not limited to, reservation fees, fuel, transportation  
14 charges and FERC Annual Charge Adjustment ("ACA") charges.

15           Additionally, PGW utilizes storages and LNG to meet operational requirements.  
16 Bundled storage contracts provide for the right both to the storage of the gas and its  
17 delivery to PGW via bundled pipeline capacity. Unbundled storage contracts provide  
18 storage rights for gas which is transported on PGW firm pipeline transportation capacity.  
19 These storages provide off-system storage and LNG provides on-system storage. While  
20 both types of storages are important to fulfill operational requirements, PGW's on-system  
21 LNG storage is vital during peak days when customer demand exceeds the amount of gas  
22 that can be physically provided through PGW's city gates.

1           Once operational requirements are met, these assets are then used in the overall  
2 cost saving strategies. For example, once design winter sendout requirements are  
3 ensured, the Company may utilize bundled storage and LNG as a substitute for higher  
4 priced gas. PGW's summer gas procurement policy uses a similar approach to address  
5 system supply and storage refill. The Gas Supply department also uses forecasted prices  
6 as a benchmark to purchase gas volumes for both system supply and storage refill below  
7 the projected cost (when possible) on a proportional basis, while leaving a portion of its  
8 needs to default to first of the month pricing.

9 **Q. DOES PGW PURCHASE GAS FROM ANY AFFILIATED INTEREST?**

10 A. No. PGW does not have any affiliated gas suppliers or pipelines.

11 **Q. DOES PGW TAKE STEPS TO ENSURE SYSTEM RELIABILITY WHILE**  
12 **SEEKING TO PROCURE GAS AT THE LEAST COST?**

13  
14 A. Yes. PGW physically sources the gas in accordance with its firm pipeline paths. The  
15 pipelines give PGW firm entitlements on their systems for the sourcing of gas for which  
16 PGW pays a demand charge. By sourcing supply in this way, PGW ensures its sole  
17 entitlement to this space on the pipeline and cannot be accused of infringement.  
18 Transporting gas from different locations also mitigates the impact of potential regional  
19 disruptions because not all of the supply enters the pipe at the same location. As a result,  
20 if there is a disruption at one location, not all of PGW's supply will be affected.  
21 PGW's Gas Planning Department also runs a supply status model during the winter  
22 operating season which recognizes normal and design winter conditions and the latest  
23 actual balance of gas in all storage facilities. Gas Management utilizes the output of this  
24 model to make recommendations or changes in its supply operating strategy to ensure  
25 that peak day needs and design winter conditions can be met from that point forward.

1 **Q. DOES PGW PERIODICALLY REVIEW ITS EXISTING CONTRACTS TO**  
2 **DETERMINE IF THEY ARE APPROPRIATE?**

3  
4 **A.** Yes. PGW reviews each of its existing contracts on a regular basis to ensure that none of  
5 the contracts are adverse to its customers' interests. Whenever appropriate, PGW  
6 initiates renegotiations (if the contract permits) to change the terms.

7 **Q. IN YOUR OPINION, ARE THE GAS COSTS INCURRED BY PGW**  
8 **REASONABLE?**

9  
10 **A.** Yes. The 2027-2018 gas costs and the gas costs incurred to date during the 2018-2019  
11 period are the result of the least cost gas procurement strategy outlined in my testimony  
12 and are therefore reasonable.

13  
14 **III. DESIGN DAY REQUIREMENT**

15 **Q. PLEASE PROVIDE AN OVERVIEW OF THE DESIGN DAY REQUIREMENT.**

16 **A.** Details of PGW's design day methodology and an account of the 2018/2019 winter  
17 design day requirement can be found in the responses to items 53.64 (c)(13) and  
18 53.64(c)(14) which were provided in PGW's February 1, 2019 GCR Filing.

19  
20 **IV. CAPACITY RELEASE, OFF-SYSTEM SALES MARGIN AND ASSET**  
21 **MANAGEMENT CREDITS/FEEES**

22  
23 **Q. HAS PGW BEEN RETAINING A PORTION OF NET PROCEEDS FROM**  
24 **CAPACITY RELEASE CREDITS, OFF-SYSTEM SALES MARGIN AND**  
25 **ASSET MANAGEMENT CREDITS/FEEES?**

26  
27 **A.** Yes. During the 2008-2009 GCR proceeding (Docket No. R-2008-2021348), the parties  
28 agreed that PGW will retain 25% of all off-system sales margins and capacity release  
29 credits with the remaining 75% applied as an offset to purchased gas costs for the

1 retention period of September 1, 2008 to August 31, 2011. Likewise, the parties agreed  
 2 that PGW will retain 25% of all off-system sales margins, capacity release credits and  
 3 asset management margins/credits/fees<sup>2</sup> with the remaining 75% applied as an offset to  
 4 purchased gas costs for the following GCR proceedings and retention periods:

GCR Proceeding	Docket No.	Retention Period
2013-2014	R-2013-2346376	9/1/13 to 8/31/14
2014-2015	R-2014-2404355	9/1/14 to 8/31/15
2015-2016	R-2015-2465656	9/1/15 to 8/31/16
2016-2017	R-2016-2526700	9/1/16 to 8/31/17
2017-2018	R-2017-2587526	9/1/17 to 8/31/18
2018-2019	R-2018-2645938	9/1/18 to 8/31/19
2019-2020	R-2019-3007636	9/1/19 to 8/31/20

5  
 6 The Company also agreed to include an off-system sales margin, capacity release credit  
 7 and asset management margins/credits/fees retention proposal for the Purchased Gas Cost  
 8 period(s) beginning on September 1, 2019 in its March 1, 2019 annual 1307(f) filing.

9 **Q. DOES PGW HAVE A RETENTION PROPOSAL FOR THE PGC PERIODS**  
 10 **BEGINNING ON SEPTEMBER 1, 2019?**

11  
 12 **A. Yes. PGW proposes to continue the retention of 25% of capacity release credits, off**  
 13 **system sales margin and asset management margin/credit/fees and the application of the**  
 14 **remaining 75% to the gas cost rate.**

---

<sup>2</sup> Asset management margins/credits/fees are received when PGW enters into a contract with a third party to manage all or part of a storage contract or firm pipeline transportation contract.

1  
2 **Q. DO OTHER PENNSYLVANIA NATURAL GAS DISTRIBUTION (“NGDCs”)**  
3 **HAVE SHARING MECHANISMS FOR CAPACITY OFF SYSTEM SALES**  
4 **CREDITS?**

5  
6 A. Yes. Six of the largest NGDCs have sharing mechanisms similar to PGW’s and the  
7 sharing percentage for all of the NGDCs is 25%.

8 **Q. HOW ARE SHARING MECHANISMS BENEFICIAL TO BOTH RATEPAYERS**  
9 **AND UTILITIES?**

10  
11 A. The ratepayers and the utility benefit from the policy because it creates an incentive to  
12 maximize efforts to make off system sales and capacity release transactions, thereby  
13 increasing the amounts applied to the gas cost rate and the lesser portion retained by the  
14 utility.

15  
16 **V. PRICE ANALYSIS AND BUYING ADVISORY SERVICE**

17 **Q. DOES PGW CURRENTLY USE A PRICE ANALYSIS AND BUYING**  
18 **ADVISORY SERVICE AS PART OF ITS EFFORTS TO OBTAIN GAS AT**  
19 **LEAST COST?**

20 A. Yes, it does. PGW utilizes a firm called Plananytics to provide such services.

21 **Q. WHAT TYPES OF SERVICES DOES PLANANYTICS PROVIDE TO PGW?**

22  
23 A. Plananytics provides the following services:

- 24 • Price feed from Nymex and Globex for natural gas, crude oil, heating oil and  
25 RBOB (reformulated gasoline);
- 26 • Buying suggestions up to 18 months in the future;
- 27 • A charting tool for technical analysis;
- 28 • Short and medium range weather forecasts;
- 29 • Weather alerts (issued in advance of significant weather events);

- 1 • Planalytics’ pre-season hurricane forecast and in-season updates; and
- 2 • Additional energy buyer features include reporting (i.e. mark-to-market,
- 3 transaction history, etc.) and portfolio/hedging parameters.

4 **Q. WHAT WAS INCORPORATED INTO PGW’S 2018-2019 GCR PROCEEDING**  
5 **SETTLEMENT AGREEMENT WITH REGARD TO THE PLANANLYTICS**  
6 **ENERGY BUYER SERVICES?**

7 A. PGW agreed to the following:

8 PGW is permitted to recover the Planalytics fee for price analysis and buying  
9 advisory services (not to exceed \$125,000) for the 2018-2019 Gas Cost Rate  
10 period. Continued recovery of the fee beyond the 2018-2019 Gas Cost Rate  
11 period must be addressed in next year’s Purchased Gas Cost proceeding.  
12

13 **Q. DOES PGW WISH TO CONTINUE THE PLANALYTICS BUYING ADVISORY**  
14 **SERVICES?**

15 A. Yes. The Planalytics’ service provides a comprehensive amount of information that the  
16 Company finds useful in the procurement of all gas supply. Nonetheless, PGW  
17 understands that it must reach a new agreement as to the continuing recovery of the  
18 Planalytics fee and the Company looks forward to discussing this issue with the parties  
19 involved in this year’s proceeding.  
20

21 **VII. GAS SUPPLY PURCHASES**

22 **Q. WHERE DID PGW PURCHASE NATURAL GAS SUPPLY ON THE TEXAS**  
23 **EASTERN TRANSMISSION CORPORATION (“TETCO”) PIPELINE IN FY**  
24 **2019?**

25 A. 100% of all baseload and swing supply purchases on the “TETCO” pipeline were from  
26 Market Zone M2 in FY 2019.

27  
28  
29  
30

**VIII. CHOICE SUPPLIER CAPACITY RELEASE CHARGES**

**Q. DID PGW AGREE TO A SETTLEMENT TERM CONCERNING CHOICE SUPPLIER CAPACITY RELEASE CHARGES IN LAST YEAR'S GCR PROCEEDING?**

**A.** Yes. The Settlement provided that PGW would include a proposal in this year's GCR proceeding to charge Choice suppliers for released capacity based on PGW's weighted average cost of Tetco and Transco capacity, or to demonstrate why such an approach is not appropriate for PGW.

**Q. HAS PGW EVALUATED ITS CHOICE SUPPLIER CAPACITY RELEASE PROGRAM?**

**A.** PGW has considered the impacts of charging Choice suppliers for released capacity based on PGW's weighted average cost of TETCO and Transco capacity. With respect to Transco, PGW currently releases capacity starting in Zone 3. It retains all capacity in Zones 1 and 2 to fill the WSS storage in Zone 3. At current levels of participation in Choice, if PGW released capacity starting in Zone 1, PGW would have approximately 12,486 Dth of capacity in Zone 1. The maximum injection rate for WSS is 18,533 Dth. So PGW would be limited in its ability to fill WSS entirely from Zone 1 if it was a lower cost option. PGW is agreeable to releasing capacity to Choice suppliers starting in Zone 1 at the full weighted average cost on a trial basis for evaluation.

With respect to TETCO, PGW has two contracts that are split between the 24 inch and 30 inch TETCO pipeline from Zone STX. These two pipelines have different paths, one passing through Zone ELA and one through ETX. Currently, PGW releases capacity starting in Zone ELA on the 30 inch pipeline only. PGW is agreeable to releasing capacity to Choice suppliers starting in Zone STX and splitting the capacity release on

1 the 24 inch and 30 inch pipelines at the full weighted average cost on a trial basis for  
2 evaluation.

3 **VIII. MONTHLY IMBALANCE RECONCILIATION PROCEDURES**

4 **Q. DID PGW AGREE TO A SETTLEMENT TERM CONCERNING ITS MONTHLY**  
5 **IMBALANCE RECONCILIATION PROCEDURES IN LAST YEAR'S GCR**  
6 **PROCEEDING?**

7 **A.** Yes. The Settlement provided that PGW would present an analysis in this year's GCR  
8 proceeding of the impact of its interruptible transportation ("IT") reconciliation  
9 procedures for the period September 2017 – August 2018.

10 **Q. HAS PGW PROVIDED AN ANALYSIS OF ITS MONTHLY IMBALANCE**  
11 **RECONCILIATION PROCEDURES?**

12  
13 **A.** Yes. My testimony below discusses this analysis in detail. I would also add that PGW has  
14 a suite of four imbalance reconciliation procedures that work together to protect PGW's  
15 GCR customers. Those procedures are detailed in PGW's Gas Service Tariff. See PGW's  
16 Gas Service Tariff – Pa. P.U.C. No. 2, Supplement No. 118 at Third Revised Pg. No. 104  
17 for those procedures.

18

19

20 **Q. IS PGW'S CURRENT METHODOLOGY FOR CALCULATING THE DAILY**  
21 **MARKET INDEX PRICE REASONABLE?**

22  
23 **A.** PGW's current methodology has been, and continues to be reasonable as shown in the  
24 attached Exhibit RMS-1, with the added protection for undersupply and oversupply  
25 during OFO events.

26 PGW's Exhibit RMS-1 summarizes the Imbalance Reconciliation for IT suppliers for FY  
27 2018 through January FY 2019. The average cashout price ranges from \$1.80 per Dth to

1 \$4.32 per Dth, excluding January 2018, which was \$15.04 per Dth. The cashout prices  
 2 excluding January 2018 are reasonable. January 2018 was an exception due to an OFO  
 3 issued by PGW to protect against undersupplies that could have resulted in the use of  
 4 PGW's limited inventory of LNG for interruptible customers, which is reserved for firm  
 5 customers. The OFO limited undersupply to protect the LNG but it did not limit  
 6 oversupply, which resulted in excessive oversupply. This reduced the use of LNG but  
 7 also resulted in higher costs to purchase the oversupply. To correct for this outcome, the  
 8 OFO issued in 2019 limited both oversupply and undersupply.

9 PGW's service territory is located in the TETCO Zone M-3 and Transco Zone 6 Non-  
 10 New York market areas, as opposed to a supply/production area zone. If PGW changed  
 11 the Daily Market Index Price reference it would create asymmetric Daily Market Index  
 12 Prices, which would lead suppliers to argue that the usage in excess of deliveries  
 13 procedures (i.e. under-deliveries) should also be priced in the same zone.

14 Overall, PGW's GCR customers are better protected by keeping the Daily Market Index  
 15 Price the same for all imbalance procedures. PGW is not inclined to change its  
 16 procedures at the time.

17  
 18 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

19 **A. Yes.**

20  
 21  
 22  
 23

1  
2  
3

**Exhibit RMS-1**

PGW Imbalance Reconciliation Table: FY 2018 Thru January FY2019									
Month	Load	Delivery	Imbalance	Position	Band 1 Charges	Band 2 Charges	(Cashed out/Cashed in)	Total	Average Price
Sep-17	728,112	721,923	-6,189	Undersupply	\$ 11,146.90	\$ -	\$	11,146.90	\$ 1.80
Oct-17	832,360	809,979	-22,381	Undersupply	\$ 23,875.18	\$ 38,800.86	\$	62,676.04	\$ 2.80
Nov-17	1,223,022	1,228,210	5,188	Oversupply	\$ (13,321.06)	\$ -	\$	(13,321.06)	\$ 2.57
Dec-17	1,743,703	1,737,672	-6,031	Undersupply	\$ 29,402.40	\$ (39.96)	\$	29,362.44	\$ 4.87
Jan-18	1,844,216	1,862,700	18,484	Oversupply	\$ (277,941.23)	\$ -	\$	(277,941.23)	\$ 15.04
Feb-18	1,453,529	1,469,564	16,035	Oversupply	\$ (44,459.59)	\$ (1,311.17)	\$	(45,770.76)	\$ 2.85
Mar-18	1,671,965	1,688,710	16,745	Oversupply	\$ (41,632.86)	\$ (2,184.06)	\$	(43,816.92)	\$ 2.62
Apr-18	1,166,678	1,214,552	47,874	Oversupply	\$ (119,030.15)	\$ (5,406.62)	\$	(124,436.78)	\$ 2.60
May-18	780,327	792,143	11,816	Oversupply	\$ (24,367.39)	\$ (2,467.44)	\$	(26,834.83)	\$ 2.27
Jun-18	767,948	769,286	1,338	Oversupply	\$ (3,470.77)	\$ -	\$	(3,470.77)	\$ 2.59
Jul-18	797,079	801,925	4,846	Oversupply	\$ (12,882.15)	\$ -	\$	(12,882.15)	\$ 2.68
Aug-18	765,704	772,137	6,433	Oversupply	\$ (18,347.54)	\$ -	\$	(18,347.54)	\$ 2.85
Sep-18	751,216	758,177	6,961	Oversupply	\$ (15,983.10)	\$ (850.05)	\$	(16,833.15)	\$ 2.42
Oct-18	1,014,226	990,435	-23,791	Undersupply	\$ 51,227.06	\$ 23,880.53	\$	75,107.59	\$ 3.16
Nov-18	1,527,674	1,529,204	1,530	Oversupply	\$ (6,236.28)	\$ -	\$	(6,236.28)	\$ 4.08
Dec-18	1,700,716	1,743,435	42,719	Oversupply	\$ (166,249.93)	\$ (2,247.22)	\$	(168,497.15)	\$ 3.94
Jan-19	2,054,035	2,047,756	-6,279	Undersupply	\$ 27,449.01	\$ (326.63)	\$	27,122.38	\$ 4.32
<b>Totals</b>	<b>20,822,510</b>	<b>20,937,808</b>	<b>115,298</b>	<b>Oversupply</b>	<b>\$ (600,821.50)</b>	<b>\$ 47,848.24</b>	<b>\$</b>	<b>(552,973.26)</b>	<b>\$ 4.80</b>

4  
5

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of PGW's Letter, 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**

Lauren M. Burge, Esq.  
Harrison W. Breitman, Esq.  
Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place Bldg.  
555 Walnut Street  
Harrisburg, PA 17101-1921  
[lburge@paoca.org](mailto:lburge@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)

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)

Dated: March 29, 2019

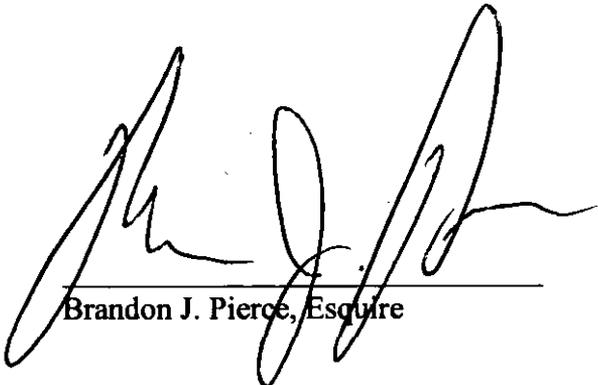
Jerome D. Mierzwa  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway  
Columbia, MD 21044  
[jmierzwa@exeterassociates.com](mailto:jmierzwa@exeterassociates.com)

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

RECEIVED

MAR 29 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



Brandon J. Pierce, Esquire

