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May 16, 2019

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

VIA ELECTRONIC FILING

**RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works;
Docket No. R-2019-3009016**

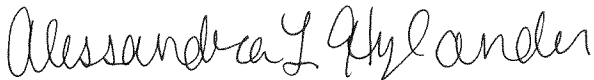
Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission the Petition to Intervene on behalf of the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Alessandra L. Hylander

Counsel to the Philadelphia Industrial and Commercial Gas Users Group

Enclosures

c: Administrative Law Judge Marta Guhl (via e-mail and First-Class Mail)
Certificate of Service

CERTIFICATE OF SERVICE

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

VIA E-MAIL AND FIRST-CLASS MAIL

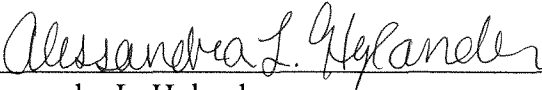
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Alessandra L. Hylander

Counsel to Philadelphia Industrial and Commercial
Gas Users Group

Dated this 16th day of May, 2019, at Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PHILADELPHIA GAS WORKS

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:
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:
:

Docket No. R-2019-3009016

**PETITION TO INTERVENE OF
THE PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71 - 5.74, the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, PICGUG asserts as follows:

1. For purposes of this proceeding, PICGUG includes the companies listed in Appendix A hereto. PICGUG will update Appendix A during the course of this proceeding, as needed, to reflect changes in its membership.

2. The names and address of PICGUG's attorneys are:

Charis Mincavage (Pa. I.D. 82039)
Adeolu A. Bakare (Pa. I.D. 208541)
Alessandra L. Hylander (Pa. I.D. 320967)
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3. On April 5, 2019, Philadelphia Gas Works ("PGW" or "Company"), filed Supplement No. 120 to Tariff Gas Pa. P.U.C. No. 2 to become effective June 4, 2019, requesting approval of its Negotiable Liquefied Natural Gas ("LNG-N") Tariff filing. The proposed Rate LNG-N would replace the existing Rate LNG and would expand the types of LNG sales and services that PGW could offer to its customers.

4. PICGUG is an *ad hoc* group of large volume natural gas customers receiving service from PGW under various rate schedules, including interruptible transportation. PICGUG members use substantial volumes of natural gas in their businesses, and natural gas costs comprise a significant element of their respective costs of operation. As a result, any PUC determination regarding PGW's Rate LNG-N proposal may impact PICGUG members' interests.

5. Therefore, consistent with 52 Pa. Code § 5.72(a), PICGUG has a significant interest in this proceeding that is not represented by any other party of record. *See* 52 Pa. Code § 5.72. Accordingly, the Commission should grant PICGUG intervenor status in this proceeding.

WHEREFORE, the Philadelphia Industrial and Commercial Gas Users Group respectfully request that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide PICGUG with intervenor status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By Alessandra L. Hylander
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Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

Dated: May 16, 2019

APPENDIX A

PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP

AdvanSix, Inc.

Einstein Healthcare Network

Newman & Company

Philadelphia College of
Osteopathic Medicine

Philadelphia Energy Solutions

Temple University

Thomas Jefferson University