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June 4, 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:

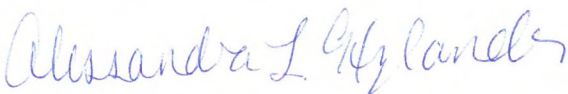
Please find enclosed for filing with the Pennsylvania Public Utility Commission the Prehearing Conference Memorandum on behalf of the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") in the above-referenced proceeding.

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

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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

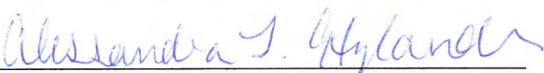
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Alessandra L. Hylander

Counsel to Philadelphia Industrial and Commercial
Gas Users Group

Dated this 4th day of June, 2019, at Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PHILADELPHIA GAS WORKS

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Docket No. R-2019-3009016

**PREHEARING MEMORANDUM OF
THE PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

Pursuant to the May 24, 2019, Prehearing Conference Order issued by Administrative Law Judge ("ALJ") Marta Guhl, the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") hereby submits this Prehearing Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

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.

On May 16, 2019, PICGUG filed a Petition to Intervene in this proceeding. A description of PICGUG is set forth in Paragraphs 1 and 4 of its Petition to Intervene. PICGUG's Petition to Intervene is pending and awaits disposition by the ALJ.

A Prehearing Conference has been scheduled in this proceeding for June 5, 2019.

II. ANTICIPATED ISSUES AND SUB-ISSUES

Because changes to the Company's terms and conditions of service may impact PICGUG members, PICGUG seeks to be involved in PGW's LNG-N proceeding. Among other things, PICGUG is concerned with any changes to the existing Rate LNG service, implementation of a new Rate LNG-N, and PGW's proposal to expand the types of LNG sales and services that PGW could offer to its customers. PICGUG anticipates pursuing these issues during this proceeding, as necessary, and reserves the right to raise further issues and to respond to all matters raised by other parties.

III. PROPOSED WITNESSES

PICGUG is currently evaluating whether it will sponsor testimony in this proceeding. If PICGUG opts to sponsor testimony, it will immediately inform the parties and the ALJ of any intended witnesses and their areas of testimony. PICGUG also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

IV. PROPOSED SCHEDULE AND DISCOVERY RULES

PICGUG does not oppose the partial procedural schedule set forth in the May 24, 2019, Prehearing Conference Order and will cooperate with the ALJ and the parties to develop a complete procedural schedule. PICGUG will also cooperate with the ALJ and the parties at the Prehearing Conference to develop appropriate discovery rules in accordance with the Commission's regulations and any ALJ directives.

V. POSSIBILITY OF SETTLEMENT

PICGUG is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By Alessandra L. Hylander

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Dated: June 4, 2019