

Deanne M. O'Dell
717.255.3744
dodell@eckertseamans.com

January 30, 2020

Via Hand Delivery

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

Re: Philadelphia Gas Works 2020-2021 Gas Cost Rate Filing
Docket No. R-2020-XXXXXXX

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SECRETARY'S BUREAU
FRONT DESK

Dear Secretary Chiavetta:

On behalf of Philadelphia Gas Works ("PGW"), enclosed for filing are an original and one CD containing the supporting information for the pre-filing for PGW's annual 2020-2021 Gas Cost Rate ("GCR") Filing. The information is presented in two volumes. Volume 1 contains Tabs 1-3 and Volume 2 contains Tabs 4-37. Consistent with the Commission's September 11, 2001 Order entered at Docket No. R-00016378, and the process followed in prior GCR filings, PGW is submitting the pre-filing information required by the Commission's regulations on or before February 1, 2020, and will submit its annual GCR filing on or before March 1, 2020.

Contained in this submission is the information required by 66 Pa. C.S. §§ 1307(f), 1317, and 1318, as well as 52 Pa. Code §§ 53.64 and 53.65, in accordance with Ordering Paragraph No. 14 of the Commission's November 2, 2000 Order, Docket No. R-00005619. The data required by 53.64(c)(1) is being filed pursuant to the attached schedule, as agreed upon by the Bureau of Investigation & Enforcement and the Office of the Consumer Advocate in prior Gas Cost Rate proceedings.

Finally, pursuant to the Commission's August 8, 2019 Order at Docket No. R-2019-3007636 approving the parties' Settlement, at Ordering Paragraph 19, PGW intends to depart from certain requirements of 52 Pa. Code Sections 53.45(b), 53.64(c), 53.68(a) and 53.64(i)(5)(i) regarding the timing of bill inserts, public notice, and underlying data to be relied upon for the March 1, 2020 Section 1307(f) filing. Specifically, PGW intends to:

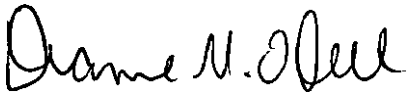
- (1) provide written notice to customers by bill insert in the one-month billing cycle commencing on the date of the annual 1307(f) filing, on March 1, of a tariff addendum and tariff or tariff supplement reflecting changes in purchased gas costs and ending no later than thirty (30) days

after the filing of such tariff addendum and tariff or tariff supplement, instead of beginning such notice with the one-month billing cycle commencing thirty (30) days prior to the filing of the tariff addendum and tariff or tariff supplement as required by 52 Pa. Code § 53.68(a);

- (2) in company offices in which payments are accepted, provide public notice on the date of the annual 1307(f) filing, March 1, of a tariff addendum and tariff or tariff supplement reflecting changes in purchased gas costs, instead of thirty (30) days prior to the filing of such tariff addendum and tariff or tariff supplement as required by 52 Pa. Code §§ 53.68(a) and 53.45(b); and
- (3) provide estimated data for both January and February in the March 1 quarterly 1307(f) filing instead of providing actual data for January alone as required by 52 Pa. Code § 53.64(i)(5)(i).

Please contact me if you have any questions.

Sincerely,



Deanne M. O'Dell

Graciela Christlieb, Senior Attorney
Philadelphia Gas Works
800 W. Montgomery Ave
Philadelphia, PA 19122

DMO/lww
Enclosure

cc: Cert. of Service w/enc.
Paul Diskin, TUS w/enc. (email only)

Filing Schedule for the Data Required by 52 Pa. Code § 53.64(c)(1)

<u>Filing Requirement</u>	<u>Data filed with the Pre-Filing</u>	<u>Data Filed with the Annual Filing</u>
Schedule 1 – Twelve (12) month purchased gas costs expressed in terms of volumes and dollars for the period January 1, 2019 to December 31, 2019	August data for the eleven (11) months ending November 30, 2019 and actual/estimated data for the one (1) month ending December 31, 2019	Actual data for the twelve (12) months ending December 31, 2019
Schedule 2 – Capacity release credits by pipeline by month for the period January 1, 2019 to December 31, 2019	Actual data for the eleven (11) months ending November 30, 2019 and actual/estimated data for the one (1) month ending December 31, 2019	Actual data for the twelve (12) months ending December 31, 2019
Schedule 3 – Twenty (20) month forecasted summary of total fuel purchased for the period January 1, 2020 through August 31, 2021	N/A	Twenty (20) month forecast
Schedule 4 – Twenty (20) month forecast of capacity release credits by pipeline by month for the period of January 1, 2020 through August 31, 2021	N/A	Twenty (20) month forecast

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's Supporting Information for Pre-filing of its Annual GCR Filing upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Federal Express

Christy M. Appleby, Esq.
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1921
cappleby@paoca.org

Sharon Webb, Esq.
Office of Small Business Advocate
Forum Place Building
555 Walnut St., 1st Fl.
Harrisburg, PA 17101
swebb@pa.gov

Gina Miller, Esq.
Bureau of Investigation & Enforcement
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
ginmiller@pa.gov

Adeolu Bakare, Esq.
McNees Wallace & Nurick
100 Pine Street
Harrisburg, PA 17101
abakare@mcneeslaw.com

Jerome D. Mierzwa
Exeter Associates, Inc.
10480 Little Patuxent Parkway
Columbia, MD 21044
jmierzwa@exeterassociates.com

Robert Knecht
Industrial Economics, Incorporated
2067 Massachusetts Ave.
Cambridge, MA 02140
rdk@indecon.com

Dated: January 30, 2020



Deanne M. O'Dell, Esq.