



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

September 28, 2020

**VIA ELECTRONIC FILING**

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

Re: Periodic Review of Philadelphia Gas Works' Long-Term Infrastructure  
Improvement Plan.  
Docket No. M-2020-3019711  
**(I&E Comments)**

Dear Secretary Chiavetta:

Enclosed for filing are comments on behalf of the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement, Pipeline Safety Division, in the above referenced matter. Copies of this correspondence have been served on the parties of record.

If you have any questions on this matter, please do not hesitate to contact me.

Sincerely,

Kayla L. Rost  
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Bureau of Investigation and Enforcement  
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KLR/ac  
Enclosures

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Re: Periodic Review of Philadelphia Gas Works' Long-Term Infrastructure  
Improvement Plan.  
Docket No. M-2020-3019711  
**(I&E Comments)**

Dear Secretary Chiavetta:

The Pennsylvania Public Utility Commission ("Commission") initiated its review of Philadelphia Gas Works' ("PGW") current Long-Term Infrastructure Improvement Plan ("LTIIIP") by Secretarial Letter dated September 1, 2020. In accordance with the Secretarial Letter, the Commission's Bureau of Investigation and Enforcement ("I&E"), Pipeline Safety Division, submits these comments for the Commission's review.

The Pipeline Safety Division notes that PGW's 2017 LTIIIP, Docket No. P-2017-2602315 (Opinion and Order dated August 31, 2017), required 31.70 miles of cast iron to be replaced in the fiscal year of 2020. Due to the restrictions imposed by the COVID-19 pandemic, PGW has completed 28.19 miles of cast iron replacement as of August 31, 2020. PGW plans to replace the deficit before the end of the 2020 calendar year and are on target to replace 31.59 miles of cast iron as projected for the fiscal year of 2021.

The Pipeline Safety Division requests that PGW adjust or amend their LTIIIP to reflect the additional replacement of pipeline mileage following the final approval of revenue received in the current rate base case, Docket No. R-2020-3017206.

Your attention to this matter is appreciated.

Sincerely,

Rob Horensky, Manager  
Safety Division  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
(717) 497-4711

cc: All parties of record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Periodic Review of Philadelphia Gas Works' : Docket No. M-2020-3019711  
Long-Term Infrastructure Improvement Plan. :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing **I&E Comments** dated September 28, 2020, upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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