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March 8, 2021

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

**VIA ELECTRONIC FILING**

**RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works (1307(f) Proceeding); Docket No. R-2021-3023970**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Prehearing Memorandum of the Philadelphia Industrial and Commercial Gas Users Group (“PICGUG”) in the above-referenced proceeding.

As shown by the attached Certificate of Service and per the Commission’s March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this filing upon request.

Sincerely,

McNEES WALLACE & NURICK LLC

By 

Charis Mincavage

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

c: Administrative Law Judge Darlene D. Heep (via e-mail)  
Certificate of Service

## CERTIFICATE OF SERVICE

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

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Charis Mincavage

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

Dated this 8<sup>th</sup> day of March, 2021, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                             |   |                           |
|-----------------------------|---|---------------------------|
| PENNSYLVANIA PUBLIC UTILITY | : |                           |
| COMMISSION                  | : |                           |
|                             | : | DOCKET NO. R-2021-3023970 |
| v.                          | : |                           |
|                             | : |                           |
| PHILADELPHIA GAS WORKS      | : |                           |

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

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Pursuant to the March 3, 2021, Prehearing Conference Order issued by Administrative Law Judge ("ALJ") Darlene D. Heep, 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 February 1, 2021, Philadelphia Gas Works ("PGW" or "Company"), submitted its Gas Cost Rate ("GCR") pre-filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") pursuant to Section 1307(f) of the Public Utility Code, 66 Pa.C.S. § 1307(f).

On February 17, 2021, 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.

On March 1, 2021, PGW submitted with the Commission its supplemental filing, which contained tariff revisions, supporting information, and prepared direct testimony.

A Prehearing Conference has been scheduled in this proceeding for March 9, 2021.

## **II. SERVICE LIST**

PICGUG requests that the names and address of the following be included on the Commission's official service list.

Charis Mincavage (Pa. I.D. 82039)  
Adeolu A. Bakare (Pa. I.D. 208541)  
Jo-Anne Thompson (Pa. I.D. 325956)  
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## **III. ANTICIPATED ISSUES AND SUB-ISSUES**

Because changes to the Company's GCR proposal may affect several of the Company's rate schedules, including schedules under which PICGUG members receive service, PICGUG seeks to be involved in PGW's GCR proceeding. PICGUG anticipates pursuing any issues associated with the Company's GCR proposal affecting the Company's rate schedules, as necessary, and reserves the right to raise further issues and to respond to all matters raised by other parties.

## **IV. 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.

**V. PROPOSED SCHEDULE AND DISCOVERY RULES**

PICGUG does not oppose the partial procedural schedule set forth in the March 3, 2021, 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.

**VI. 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 

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and Commercial Gas Users Group

Dated: March 8, 2021