



McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

**Charis Mincavage**  
Direct Dial: 717.237.5437  
Direct Fax: 717.260.1725  
cmincavage@mcneeslaw.com

February 24, 2022

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-2022-3030686**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene 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.

Sincerely,

A handwritten signature in cursive script that reads 'Charis Mincavage'.

Charis Mincavage  
MCNEES WALLACE & NURICK LLC

c: Charles E. Rainey Jr., Chief Administrative Law Judge (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).

### VIA E-MAIL

Craig W. Berry, Esq.  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
[craig.berry@pgworks.com](mailto:craig.berry@pgworks.com)

Kristine Marsilio, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[kmarsilio@eckertseamans.com](mailto:kmarsilio@eckertseamans.com)

Gina L. Miller, Esq.  
Scott B. Granger, Esq.  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
P. O. Box 4365  
Harrisburg, PA 17105-3265  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

Patrick M. Cicero, Esq.  
Aron J. Beatty, Esq.  
Christy Appleby, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[pcicero@paoca.org](mailto:pcicero@paoca.org)  
[abeatty@paoca.org](mailto:abeatty@paoca.org)  
[cappleby@paoca.org](mailto:cappleby@paoca.org)

Sharon E. Webb, Esq.  
Office of Small Business Advocate  
1102 Commerce Building  
300 North Second Street  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)

Jerome D. Mierzwa  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway, Suite 300  
Columbia, MD 21904-2690  
[jmierzwa@exeterassociates.com](mailto:jmierzwa@exeterassociates.com)

Robert Knecht  
Industrial Economics Inc.  
2067 Massachusetts Ave.  
Cambridge, MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)



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Charis Mincavage

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

Dated this 24<sup>th</sup> day of February, 2022, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	
	:	DOCKET NO. R-2022-3030686
v.	:	
	:	
PHILADELPHIA GAS WORKS	:	

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

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TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to the provisions of 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 states as follows:

1. Petitioner is PICGUG. The composition of PICGUG is attached hereto as Appendix A. PICGUG reserves the right to modify Appendix A throughout the course of this proceeding, as necessary.

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

Charis Mincavage (Pa. I.D. 82039)  
Adeolu A. Bakare (Pa. I.D. 208541)  
McNEES WALLACE & NURICK LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
Phone: (717) 232-8000  
Fax: (717) 237-5300  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)

3. On February 1, 2022, 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). Pursuant to this pre-filing, PGW is not proposing any rate structure or rate allocation changes at this time. PGW's supplemental filing is expected on or around March 1, 2022.

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. PGW's GCR proposal may affect several of the Company's rate schedules, including schedules under which PICGUG members receive service. As a result, any PUC determination regarding PGW's 2022 GCR 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(a). Accordingly, the Commission should grant PICGUG intervenor status in this proceeding.

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

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Charis Mincavage (Pa. I.D. 82039)  
Adeolu A. Bakare (Pa. I.D. 208541)  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
Phone: (717) 232-8000  
Fax: (717) 237-5300  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)

Counsel to the Philadelphia Industrial  
and Commercial Gas Users Group

Dated: February 24, 2022



**APPENDIX A**

**PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

Einstein Healthcare Network

Newman & Company

Philadelphia College of  
Osteopathic Medicine

Temple University

Thomas Jefferson University