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March 8, 2022

**VIA ELECTRONIC FILING**

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

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works;  
Docket No. R-2022-3030686; **PETITION TO INTERVENE OF GRAYS FERRY  
COGENERATION PARTNERSHIP AND VICINITY ENERGY  
PHILADELPHIA, INC.**

Dear Secretary Chiavetta:

Enclosed for filing with The Pennsylvania Public Utility Commission is the Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc.'s Petition to Intervene in the above-captioned matter. Copies of the Petition have been served in accordance with the Certificate of Service.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (717) 236-1300.

Very truly yours,

Dennis A. Whitaker  
Kevin J. McKeon  
Todd S. Stewart  
Bryce R. Beard  
*Counsel for Grays Ferry Cogeneration  
Partnership and Vicinity Energy Philadelphia,  
Inc.*

BRB/jld  
Enclosure

cc: Deputy Chief Administrative Law Judge Christopher P. Pell (via email [cpell@pa.gov](mailto:cpell@pa.gov))  
Honorable Arlene Ashton (via email [aashton@pa.gov](mailto:aashton@pa.gov))  
Per Certificate of Service

**CERTIFICATE OF SERVICE**

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

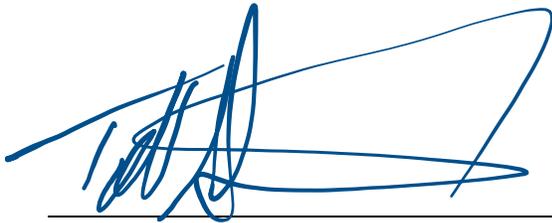
**VIA ELECTRONIC MAIL ONLY**

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*Counsel for Philadelphia Industrial  
and Commercial Gas Users Group*



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Dennis A. Whitaker  
Kevin J. McKeon  
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Bryce R. Beard

DATED: March 8, 2022

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Office of Consumer Advocate	:	
Office of Small Business Advocate	:	Docket Nos. R-2022-3030686
	:	C-2022-3030978
v.	:	C-2022-3030971
	:	
Philadelphia Gas Works	:	

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**PETITION TO INTERVENE OF  
GRAYS FERRY COGENERATION PARTNERSHIP  
AND VICINITY ENERGY PHILADELPHIA, INC.**

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**TO THE DEPUTY CHIEF ADMINISTRATIVE LAW JUDGE CHRISTOPHER PELL  
AND HONORABLE ARLENE ASHTON:**

NOW COMES Grays Ferry Cogeneration Partnership (“GFCP”) and Vicinity Energy Philadelphia, Inc. (“VEPI”) (collectively “Vicinity”), by and through their attorneys, Hawke McKeon & Sniscak LLP, and files this Petition to Intervene in the above-captioned proceedings before the Pennsylvania Public Utility Commission (“Commission”) pursuant to 52 Pa. Code § 5.71 *et seq* of the Commission’s regulations. In support of their Petition to Intervene, Vicinity asserts the following:

1. On March 1, 2022, Philadelphia Gas Works (“PGW”) submitted to the Commission PGW’s Section 1307(f) Gas Cost Rate Filing. PGW’s 1307(f) filing and tariff supplements may impact the rates and services charged to Vicinity. GFCP and VEPI are customers of PGW and are the largest consumers of natural gas on the PGW system.

2. All correspondence and pleadings in this docket should be directed to Vicinity's counsel in this matter:

Dennis A. Whitaker, Attorney ID No. 53975  
Kevin J. McKeon, Attorney ID No. 30428  
Todd S. Stewart, Attorney ID No. 75556  
Bryce R. Beard, Attorney ID No. 325837  
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3. Eligibility to intervene in Commission proceedings is governed by the Commission's regulations found at 52 Pa. Code § 5.72. The Commission's regulations provide that in order to have the ability to intervene, a party must have “a right or interest” sufficient to warrant intervention, which includes an interest that may be directly affected by the proceeding and which is not being adequately represented by existing participants, and where the petitioner may be bound by the actions of the Commission or where the right or interest is otherwise in the public interest. *Id.*

4. Vicinity has such an interest. Vicinity is the largest customer of PGW for natural gas transportation service. Vicinity operates a cogeneration steam plant which burns natural gas to produce electricity and captures waste steam which VEPI, a steam heat utility, provides to customers in Philadelphia under approved Commission terms and rates. As the largest customer of PGW, and a unique customer that takes service from a single customer pipeline owned and operated by PGW along with low pressure sales service from the PGW distribution system, Vicinity will be substantially and directly affected by any decision, final order, or settlement in

this matter and will be bound thereby. Moreover, no other party can represent Vicinity's interest under these circumstances.

5. For the reasons stated above, Vicinity's intervention in this matter meets the intervention standards of 52 Pa. Code § 5.72 and is otherwise in the public interest. Accordingly, Vicinity requests that this intervention be granted and that it be allowed full party status in this matter.

6. Vicinity will participate in this proceeding in compliance with Your Honors' March 2, 2022, Prehearing Order entered which sets the litigation schedule, discovery procedures, and other aspects for this proceeding. Vicinity intends to be an active party participating to ensure its unique interest are represented.

**WHEREFORE**, Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc. respectfully requests that Your Honors grant this Petition to Intervene, providing Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc. with full-party status in these proceedings, and allow such other relief as deemed necessary.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'Dennis A. Whitaker', written over a horizontal line.

Dennis A. Whitaker, Attorney ID No. 53975  
Kevin J. McKeon, Attorney ID No. 30428  
Todd S. Stewart, Attorney ID No. 75556  
Bryce R. Beard, Attorney ID No. 325837  
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*Counsel for Grays Ferry Cogeneration  
Partnership and Vicinity Energy  
Philadelphia, Inc.*

DATED: March 8, 2022