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June 21, 2022

Via eFiling

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, 1 North
400 North Street
Harrisburg, PA 17120

Re: Petition of Philadelphia Gas Works for Approval of its Third Long-Term Infrastructure Improvement Plan for the Period Beginning September 1, 2022 and Ending August 31, 2027, Docket No. P-2022-3032303

Dear Secretary Chiavetta:

In response to PGW's submission of its Third Long Term Infrastructure Improvement Plan¹ ("Third LTIIIP"), the Office of Consumer Advocate ("OCA") submitted Comments,² dated June 2, 2022. In the Comments, OCA stated the submission of information on the expected incidental reduction in bare steel service lines due to the acceleration of the smaller diameter cast iron main replacements would assist the Commission and its staff in their review of PGW's Third LTIIIP.

The supplemental information was attached to OCA's Comments and is shown in a different format in the following table:

[Table appears on next page]

¹ <https://www.puc.pa.gov/pcdocs/1742862.pdf>.

² <https://www.puc.pa.gov/pcdocs/1747260.pdf>.

<u>Total Steel Service Reduction*</u>	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021
Main Replacement	1228	1266	1613	1212	992	1738
<u>Number of Bare Steel Services at the end of CY 2021</u>						
68187						
	<u>FY 2022</u>	<u>FY 2023</u>				
Projected Number of Additional Renewals resulting from Accelerated Main Replacement (All Sizes)	480	530				
Projected Number of Renewals resulting from Baseline Main Replacement	1567	1694				
Projected Number of Renewals resulting from all Main Replacement Categories	2047	2224				
* Total Steel Service Reduction numbers do not include steel service reduction associated with programs other than main replacement						

PGW submits that OCA’s Comments do not raise material factual issues, and that no revisions to PGW’s Third LTIP are required at this point.

As a result of the foregoing, PGW’s Third LTIP is adequate and sufficient to ensure and maintain adequate, efficient, safe, reliable, and reasonable service. Accordingly, PGW respectfully requests the Commission to approve its Third LTIP as filed.

Sincerely,



Daniel Clearfield, Esquire

DC/ctm
 Enclosure

cc: Cert. of Service w/enc.
 Paul Diskin, Bureau of Technical Utility Services (email only: pdiskin@pa.gov)
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 Debra Backer, Bureau of Technical Services (email only: dbacker@pa.gov)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's Letter Regarding OCA's Comments to PGW's Third LTIP, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

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Dated: June 21, 2022



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