



September 6, 2022

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

Re: **Petition of Philadelphia Gas Works for Approval on Less than Statutory Notice of
Tariff Supplement Revising Weather Normalization Adjustment**

Docket No: P-2022-3034264

Dear Secretary Chiavetta,

Attached for filing please find the Tenant Union Representative Network's (TURN) Petition to Intervene in the above captioned proceeding. Copies are being served per the attached Certificate of Service.

Respectfully submitted,

/s/ Robert W. Ballenger
Robert W. Ballenger

On behalf of TURN

Cc. Service list
Encl.



CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing Petition upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54.

Via Email Only

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September 6, 2022

/s/ Robert W. Ballenger
Robert W. Ballenger, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works :
For Approval on Less than Statutory Notice : **Docket No. P-2022-3034264**
Of Tariff Supplement Revising :
Weather Normalization Adjustment :

PETITION TO INTERVENE OF TENANT UNION REPRESENTATIVE NETWORK

The Tenant Union Representative Network (TURN), through counsel Community Legal Services, Inc., hereby files this Petition to Intervene in the above-captioned proceeding, pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (PUC or Commission), 52 Pa. Code §§ 5.71-5.76, and in support, state as follows:

1. Petitioner TURN is a Philadelphia based consumer membership and advocacy organization, which advocates on behalf of low- and moderate-income residential tenants in Philadelphia. TURN is located at 100 South Broad Street, Suite 800, Philadelphia, PA 19110.

2. Petitioner is represented by:

Robert W. Ballenger, Esq. (Pa. ID: 93434)
Joline R. Price, Esq. (Pa. ID: 315405)
Kintéshia S. Scott, Esq. (Pa. ID: 328600)
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3. The Respondent utility is:

Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

4. On August 4, 2022, PGW filed a Petition requesting approval of a revision to its Tariff to place a cap on its Weather Normalization Adjustment (WNA) to limit that charge or credit appearing on any customer's bill to no more than 25% of total Delivery Charges. PGW requested consideration of its Petition on or before the Commission's September 15, 2022 meeting, in order that its revised Tariff could be in effect on October 1, 2022.

5. As PGW acknowledges, the basis for its Petition is the WNA's imposition of unusually large charges on PGW customers' bills for mid to late May 2022 usage. Petition ¶5.

6. PGW's Petition requests the commission approve its revised Tariff in advance of addressing potential complaints or conducting an investigation, and submits that its voluntary proposal to revise its WNA renders further investigation unnecessary. Petition ¶26.

7. On August 22, 2022, the Office of Consumer Advocate (OCA) filed its Answer to PGW's Petition, submitting that PGW's WNA tariff as currently applied potentially violates Pennsylvania law and arguing that the WNA must be suspended.

8. OCA also asserts that PGW has failed to provide evidence supporting its proposed 25% cap, and has not explained how the cap would rectify variation in WNA charges between similarly-situated customers simply because they happen to be in different billing groups.

9. TURN shares OCA's concerns with PGW's Petition, and questions whether imposing a 25% cap on WNA credits and charges is sufficient to render the resulting rates just, reasonable and nondiscriminatory.

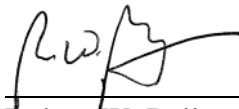
10. Furthermore, TURN is concerned that the impact of WNA charges presents particular challenges for low- and moderate-income tenants who may have little to no ability to control their energy usage due to lack of landlord maintenance, poor housing conditions, actions or inactions of adjacent tenants, and other factors.

11. Affordability of PGW service is critical to the low-income members of TURN who pay for service directly as customers or indirectly through rents. PGW's WNA has been shown to create unusually large bills, far beyond what low- and moderate-income tenants can afford to pay for gas service.

12. Petitioner TURN seeks to intervene on behalf of its membership of low- and moderate-income tenants, a substantial number of whom are customers of PGW or dependent on PGW natural gas service and all residing in Philadelphia. In those capacities, TURN's members have a direct, immediate, substantial and distinct interest in the PGW's rates and the impact of PGW's WNA on monthly bills. Petitioner TURN therefore has interests in this proceeding, which may be directly affected and which are not adequately represented by other participants, and as to which Petitioner may be bound by the action of the Commission in this proceeding.

WHEREFORE, TURN respectfully requests that the Commission grant this Petition to Intervene providing TURN with full-party status in this proceeding.

Respectfully submitted,



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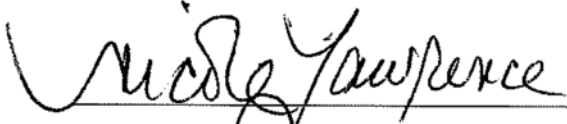
Telephone: 215-981-3700
Facsimile: 215-981-0434

September 6, 2022

VERIFICATION

I, Nicole Lawrence, on behalf of Tenant Union Representative Network (TURN), hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

Date: September 6, 2022


Title: Executive Director, TURN