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January 12, 2023

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; Docket No. R-2022-3036472**

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 proceedings.

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 black ink that reads 'Charis Mincavage'.

Charis Mincavage  
MCNEES WALLACE & NURICK LLC

c: Marta Guhl, Administrative Law Judge (via e-mail)  
Athena DelVillar Legal Assistant (via e-mail)  
Certificate of Service



3. PICGUG is an *ad hoc* group of large volume natural gas customers receiving service from PGW under Rate Interruptible Transportation ("IT"). 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.

4. In November 2022, PGW filed a Tariff Supplement seeking to extend its Rate Schedule GTS stemming from a complaint proceeding involving Grays Ferry Cogeneration Partnership ("Grays Ferry") and Vicinity Energy Philadelphia, Inc. ("Vicinity") (collectively "GFVE").

5. Because PICGUG members receive service from PGW and any changes to PGW's Tariff could impact PICGUG members, PICGUG submits that its intervention here is warranted in order to ensure that its members' interests are adequately protected.

6. 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 

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Counsel to the Philadelphia Industrial  
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Dated: January 12, 2023



**APPENDIX A**

**PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

Einstein Healthcare Network

Newman & Company

Philadelphia College of  
Osteopathic Medicine

Temple University

Thomas Jefferson University

## 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  
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Dated this 12<sup>th</sup> day of January, 2023, at Harrisburg, Pennsylvania