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February 14, 2023

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

VIA ELECTRONIC FILING

**RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works - 1307(f);
Docket No. R-2023-3038069**

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 black ink 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

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Charis Mincavage

Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

Dated this 14th day of February, 2023, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 :
 v. :
 : Docket No. R-2023-3038069
Philadelphia Gas Works 2023-2024 Gas Cost :
Rate Filing :

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

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)
Sarah Hibbert (Pa. I.D. 329068)
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3. On February 1, 2023, Philadelphia Gas Works ("PGW") filed three documents containing the pre-filing supporting information for its 2023-2024 Gas Cost Rate ("GCR") filing. These filings contain the information required by 66 Pa. C.S. §§ 1307(f), 1317, and 1318, as well as 52 Pa. Code § 53.64 and 53.65. PGW also represented that it plans to submit its annual GCR filing on or before March 1, 2023.

4. PICGUG is an *ad hoc* group of large volume natural gas customers receiving service from PGW under various rate schedules, including Rate Schedule - 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. 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 2023 GCR may impact PICGUG members' interests.

5. 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)

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Counsel to the Philadelphia Industrial
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Dated: February 14, 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