

March 27, 2023

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2023-2027
Submitted in Compliance with 52 Pa. Code § 62.4Docket No. M-2021-3029323

Dear Secretary Chiavetta:

Philadelphia Gas Works (“PGW”) respectfully requests an extension to June 12, 2023 to submit its Revised 2023-2027 Universal Service and Energy Conservation Plan (“Revised 2023 USECP”) in accordance with the following Commission Orders entered at this docket entered on: (1) January 12, 2023 (“*Initial Order*”), (2) February 9, 2023 (“*First Extension Order*”); and, (3) March 16, 2023 (“*Reconsideration Order*”).

In its January 12, 2023 *Initial Order*, the Commission directed PGW to file a Revised 2023 USECP conforming to directives in the Order within 30 days. On the basis that the directives included over thirty changes, many of which involve the need for further evaluation and consideration of the feasibility of the Commission imposed implementation timeframes, PGW sought and received an extension until April 12, 2023 to file the Revised 2023 USECP.¹ The Commission also granted, pending review of the merits, PGW’s Petition for Reconsideration in the February 9, 2023 *First Extension Order* and noted that PGW could seek an additional extension of time to file the Revised 2023 USECP pending the Commission’s disposition of PGW’s Petition for Reconsideration on the merits.²

A little over a month later, in its March 16, 2023 *Reconsideration Order*, the Commission adjudicated PGW’s Petition for Reconsideration. The Commission did not alter or modify the currently pending April 12, 2023 due date for the filing of the Revised 2023 USECP. The *Reconsideration Order* did, however, set a firm implementation deadline of July 1, 2024 and

¹ *First Extension Order*, ordering Paragraph 2 at 2-3.

² *Id.* Ftnte. 2 at 2.

directed PGW to file, no later than December 31, 2023, an implementation timeline for the changes addressed in the *Reconsideration Order*.

PGW requests that the current due date of April 12, 2023 for its Revised 2023 USECP be extended to June 12, 2023. While the process of preparing the Revised 2023 USECP is underway, the additional direction received from the Commission warrants further evaluation and consideration in the full context of the entire plan. The finalized conditions, potentially costly system changes, and new policies and new reporting requirements just recently finalized by the Commission require more time to evaluate and incorporate in the Revised 2023 USECP than is currently available with the impending April 12, 2023 deadline. This evaluation also needs to consider how best to capture the settlement stipulations from other cases in the Revised 2023 USECP. PGW appreciates the Commission's consideration of this request as the additional time will permit a more thorough consideration of the best way to incorporate and ensure compliance with the Commission's directives for these very important customer programs.

Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/lww

Enclosure

cc: Cert. of Service
Norma Bowman, Bureau of Consumer Services [nobowman@pa.gov]
Christina Chase-Pettis, Office of Communications [cchasepett@pa.gov]
Louise Fink Smith, Law Bureau [finksmith@pa.gov]

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's Request for Extension upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

Robert W. Ballenger, Esq.
Joline Price, Esq.
Community Legal Services
1424 Chestnut Street
Philadelphia PA 19102
rballenger@clsphila.org
jprice@clsphila.org

Elizabeth R Marx, Esq.
Ria Pereira, Esq.
John Sweet, Esq.
Lauren Berman, Esq.
Pa Utility Law Project
118 Locust Street
Harrisburg PA 17101
pulp@pautilitylawproject.org

Darryl Lawrence, Esq.
Christy Appleby Esq.
Office of Consumer Advocate
555 Walnut Street 5th Floor
Forum Place
Harrisburg PA 17101
dlawrence@paoca.org
cappleby@paoca.org

Louise Fink Smith, Esq.
Law Bureau
PA Public Utility Commission
P.O. Box 3265
400 North Street, 3rd Floor
Harrisburg, PA 17105-3265
Finksmith@pa.gov

Dated: March 27, 2023

Sharon E Webb, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street 1st Floor
Harrisburg PA 17101
swebb@pa.gov

Richard Kanaskie, Esq.
Bureau of Investigation & Enforcement
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
rkanaskie@pa.gov

Charis Mincavage, Esq.
McNees Wallace & Nurick
100 Pine Street
Harrisburg, PA 17101
cmincavage@mcneeslaw.com

Joseph Magee
Laura Mohr
Bureau of Consumer Services
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265
jmagee@pa.gov
laumohr@pa.gov

Graciela Christlieb, Esq.
Craig W. Berry, Esq.
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia PA 19122
Graciela.Christlieb@pgworks.com
Craig.Berry@pgworks.com

/s/ Deanne M. O'Dell

Deanne M. O'Dell, Esq.