

COMMONWEALTH OF PENNSYLVANIA



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April 27, 2023

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

Re: Petition of Philadelphia Gas Work for
Emergency Order
Docket No. P-2023-3040233

Dear Secretary Chiavetta,

Earlier today, on April 27, 2023, Philadelphia Gas Works (PGW or Company) filed its Petition for Emergency Order (Petition). In the Petition, PGW is seeking the issuance of *ex parte* emergency relief **by tomorrow, April 28, 2023**, that would permit PGW to revise its Gas Service Tariff- Pa. P.U.C. No. 2, Page Nos. 149-150 to remove May 2023 from the Weather Normalization Adjustment (WNA) clause calculation. Petition ¶ 20. Given that the next public meeting is not scheduled until May 20, 2023, PGW files the emergency request for Commission action by April 28, 2023. As explained below, **the Office of Consumer Advocate files this Letter/Answer in Support of PGW's request to suspend its Weather Normalization Adjustment rider.**

Last year, in May 2022, some customers experienced significant increases to the WNA in their June 2022 bills due to the impact of a what PGW calls a weather anomaly. Petition at ¶ 26. As a result, the Commission initiated an investigation into PGW's WNA, and that proceeding is currently on-going at Docket Nos. R-2022-3034229, P-2022-3034264. PGW has also raised the WNA issue in its on-going base rate proceeding at Docket No. R-2023-3037933. In its Petition, PGW states that another potential May 2023 "anomaly" could occur for the May 2023 period and requests emergency relief in order to avoid a similar occurrence. *Id.* at ¶¶ 20, 25-27. Given the potential significant financial harm to customers, the OCA supports the Company's emergency action and proposal to remove May 2023 from the WNA clause. In particular, the OCA agrees with PGW's Petition that without relief, low-income customers who are already suffering during a time of increasing inflation may experience greater financial hardship. *Id.* at ¶¶ 26, 29. As PGW states, "the most effective way to address these impacts for the benefit of potentially affected customers is to proactively remove this May from the WNA formula so as to minimize or avoid any irreparable injury from occurring." *Id.* at ¶¶ 26, 29.

The OCA notes that also on April 27, 2023, PGW filed a separately docketed Petition for Interlocutory Review and Answer to Material Question (Petition for Interlocutory Review). PGW

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references the filing in the instant Petition. *See* Petition ¶¶ As PGW states in the instant Petition, the OCA does not support the Company's Petition for Interlocutory Review. The OCA will separately file an Answer to the Petition for Interlocutory Review.

For the reasons set forth above, the OCA respectfully requests that PGW's Petition for Emergency Order be approved by April 28, 2023, and that the WNA be suspended for May 2023.

Respectfully Submitted,

/s/ Christy M. Appleby

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Robert Gramola, Acting Executive Director (email only)
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Certificate of Service

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CERTIFICATE OF SERVICE

Petition of Philadelphia Gas Works for : Docket No. P-2023-3040233
Emergency Order :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Letter in Lieu of an Answer, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 27th day of April 2023.

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