



April 28, 2023

VIA E-File

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**

CAUSE-PA Letter In Lieu of Answer

Secretary Chiavetta:

The Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA) submits this Letter In Lieu of Answer in response to the Petition of Philadelphia Gas Work for Emergency Order, (Emergency Petition) filed April 27, 2023 at the above referenced docket. In the Petition, PGW is seeking the issuance of ex parte emergency relief by today, 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. Emergency Petition ¶ 20.

Similar to the position taken by the Office of Consumer Advocate (OCA) in its April 27, 2023 response to PGW's Emergency Petition, CAUSE-PA supports PGW's Emergency Petition and proposal to remove May 2023 from the WNA clause. CAUSE-PA shares the concerns of PGW and OCA that, without extraordinary emergency relief, low-income customers who already struggle to afford gas service and are suffering due to increasing inflation could experience greater financial hardship if another WNA rate spike, similar to the May 2022 event, were to occur. *Id.* at ¶¶ 26, 29. We agree with PGW and OCA that PGW should proactively remove this May from the WNA formula so as to minimize further irreparable injury from occurring. *Id.* at ¶¶ 26, 29.

However, CAUSE-PA also notes its opposition to PGW's separately filed April 27, 2023 Petition for Interlocutory Review and Answer to Material Question (Petition for Interlocutory Review) at docket number R-2022-3034229 and P-2022-3034264, seeking to discontinue the ongoing WNA related proceedings – wherein the parties have advanced proposals to more fully redress the harms caused by PGW's WNA. CAUSE-PA will separately file an Answer to the Petition for Interlocutory Review at the appropriate dockets.

For the reasons set forth above, CAUSE-PA respectfully requests that PGW's Petition for Emergency Order be approved without delay, and that the WNA be suspended – at minimum - for May 2023. As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "John W. Sweet". The signature is written in a cursive style with a horizontal line above the name.

John W. Sweet, Esq.
Counsel for CAUSE-PA

CC: *Secretary Chiavetta (Cover Letter and Certificate of Service only)*
Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:		
	:		
v.	:	Docket No.	R-2022-3034229
	:		P- 2022-3034264
Philadelphia Gas Works	:		

Certificate of Service

I hereby certify that I have this day served copies of the **Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania Letter In Lieu of Answer to the Petition of Philadelphia Gas Work for Emergency Order** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

VIA Email

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