



**peco**<sup>SM</sup>

AN EXELON COMPANY

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March 28, 2024

**VIA eFILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

**Re: Pennsylvania Public Utility Commission v.  
PECO Energy Company – Gas Division  
Docket No. R-2024-3046932**

Dear Secretary Chiavetta:

Pursuant to Section 1308 of the Pennsylvania Public Utility Code, enclosed for filing on behalf of PECO Energy Company (“PECO” or the “Company”) is a Certificate of Service evidencing filing of PECO’s Tariff Gas – Pa. P.U.C. No. 6 (“Tariff No. 6”), which has been uploaded to the Secretary’s SharePoint site due to its size. Tariff No. 6 sets forth proposed rates designed to produce an increase in the Company’s annual distribution revenue of approximately \$111 million based on data for a fully projected future test year ending December 31, 2025.

**CONTENTS OF THE FILING**

Tariff No. 6 contains revisions in, additions to, and deletions from certain Rules and Regulations, rate schedules, and riders in the Company’s currently effective tariff. Tariff No. 6 also bears an issue date of March 28, 2024, and an effective date of May 27, 2024.

Along with Tariff No. 6, the Company is filing all the supporting data required by the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) regulations at 52 Pa. Code §§ 53.52 – 53.53, including the written direct testimony of ten witnesses who are identified in PECO Statement No. 1, the Direct Testimony of Amy E. Hamilton. A summary

of the reasons for the proposed rate increase is set forth in the Company's Statement of Specific Reasons for Proposed Increase in Gas Rates.

An index of the filing is included as Attachment A to this letter.

**COUNSEL OF RECORD AND SERVICE ON THE COMPANY**

PECO will be represented by the following counsel in this proceeding:

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PECO's attorneys are authorized to accept service on behalf of the Company in this proceeding. PECO requests that the Commission and all parties electronically serve copies of all documents in this proceeding on its attorneys.

**USE OF ALTERNATIVE METHOD OF CUSTOMER NOTIFICATION**

PECO hereby advises the Commission that it has elected to use the alternative method of customer notification set forth in the Commission's regulations at 52 Pa. Code § 53.45(b)(4). Consequently, as required by that regulation, PECO will notify its customers of the proposed rate increase through bill inserts along with paid advertisements in major local newspapers.<sup>1</sup> PECO also agrees to extend from 60 to 90 days the minimum period within which the filing of a complaint places the burden of proof upon the Company with respect to proposed rates, pursuant to 52 Pa. Code § 53.45(b)(4)(vi).

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<sup>1</sup> In addition, PECO is posting notice of this filing at its Company headquarters pursuant to 52 Pa. Code § 53.45(b)(1), posting the filing to its website, <https://www.peco.com/my-account/my-dashboard/rates-tariffs/filings>, and issuing a news release describing the proposed changes to local newspapers and to local radio and television stations, pursuant to 52 Pa. Code § 53.45(b)(2).

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
March 28, 2024  
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**REQUEST FOR CONFIDENTIAL TREATMENT  
OF PROPRIETARY INFORMATION**

Certain Company responses to Commission filing requirements contain information that PECO considers to be proprietary and confidential. These materials have been marked ***Confidential*** and are being included in separate electronic files submitted to the Secretary's SharePoint site.

PECO requests that the copies of the materials that have been marked ***Confidential*** be treated confidentially by the Commission, including its various Offices and Bureaus. In particular, the Company requests that the ***Confidential*** material be excluded from the Commission's public document folder and not be disclosed to the public. PECO intends to request the entry of an appropriate Protective Order from the presiding Administrative Law Judge(s) to maintain the confidentiality of such material if it is to be provided to parties in this case.

**CERTIFICATE OF SERVICE**

As indicated on the attached Certificate of Service, the Company has served copies of this filing on the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, and the Office of Small Business Advocate. The Company is also providing courtesy copies of the filing to Law Bureau (David E. Screven, Chief Counsel).

Respectfully submitted,



Richard G. Webster, Jr.

Enclosures

c: Certificate of Service (w/encls.)

# **ATTACHMENT A**

**PECO ENERGY COMPANY 2024 GAS RATE CASE**

**DOCKET NO. R-2024-3046932**

**FILING INDEX**

**Volume I**

**Cover Letter**

**Index**

**Statement of Specific Reasons**

**Plain Language Statement of Reasons**

**Section 53.52 Filing Requirements**

**Customer Notice**

**PECO Verification**

**PECO Exhibit 1: PECO Gas Tariff No. 5 - Current**

**PECO Exhibit 2: PECO Gas Tariff No. 6 - Proposed**

**Volume II**

**PECO Statement No. 1: Direct Testimony of Amy E. Hamilton**

**PECO Statement No. 2: Direct Testimony of Marissa Humphrey**

- **PECO Exhibit MH-1: BSC Operations & Maintenance Costs**

**PECO Statement No. 3: Direct Testimony of Michael J. Trzaska**

- **PECO Exhibit MJT-1: Principal Accounting Exhibit - FPFTY ended December 31, 2025**
- **PECO Exhibit MJT-2: Principal Accounting Exhibit - FTY ended December 31, 2024**
- **PECO Exhibit MJT-3: Principal Accounting Exhibit - HTY ended December 31, 2023**

**PECO Statement No. 4: Direct Testimony of Caroline Fulginiti**

- **PECO Exhibit CF-1: Annual Depreciation Accruals Related to Utility Plant in Service for 2023**
- **PECO Exhibit CF-2: Estimated Annual Depreciation Accruals Related to Utility Plant in Service for 2024**
- **PECO Exhibit CF-3: Estimated Annual Depreciation Accruals Related to Utility Plant in Service for 2025**
- **PECO Exhibit CF-4: 2018 Depreciation Study – Calculated Annual Depreciation Accruals Related to Gas Plant as of December 31, 2018**

**Volume III**

**PECO Statement No. 5: Direct Testimony of Paul R. Moul**

- **PECO Exhibit PRM-1: Cost of Capital and Fair Rate of Return**

**PECO Statement No. 6: Direct Testimony of Jiang Ding**

- **PECO Exhibit JD-1: Gas Class Cost of Service Study for FPFTY Ended December 31, 2025 - Summary of Results**
- **PECO Exhibit JD-2: Gas Class Cost of Service Study for FPFTY Ended December 31, 2025 - Allocation By Rate Class**
- **PECO Exhibit JD-3: Gas Class Cost of Service Study for FPFTY Ended December 31, 2025 - Allocation By Functional Classification**
- **PECO Exhibit JD-4: Gas Class Cost of Service Study for FPFTY Ended December 31, 2025 - Unitized Functionally Classified Revenue Requirement**
- **PECO Exhibit JD-5: Customer-Related Revenue Requirement and Customer Charge**

**PECO Exhibit JD-6: FPFTY Test Year 2025 - Cost of Service Study - External Allocation Factors**

**PECO Exhibit JD-7: Gas Class Cost of Service Study for FPFTY Ended December 31, 2025 – Calculation of Costs to Serve NGS Customers**

**PECO Statement No. 7: Direct Testimony of Joseph A. Bisti**

- **PECO Exhibit JAB-1: Proposed Revenue Allocation, Proposed Increases by Class and Class Rates of Return and Relative Rates of Return Under Proposed Rates**
- **PECO Exhibit JAB-2: Relevant Gas Service Tariff Pages (Redline to Show Changes)**
- **PECO Exhibit JAB-3: Comparison of Residential Customer Charges for Pennsylvania Natural Gas Distribution Utilities**
- **PECO Exhibit JAB-4: Proof of Revenues at Present and Proposed Rates**
- **PECO Exhibit JAB-5: Calculation Methodology for Differentiated Rate GC Customer Charge by Tier**
- **PECO Exhibit JAB-6: Modified Base Rate Recovery of CAP Revenues in Gas USFC**

**PECO Statement No. 8: Direct Testimony of Megan A. McDevitt**

- **PECO Exhibit MAM-1: Calculation of the Gas Procurement Charge (“GPC”)**

- **PECO Exhibit MAM-2: Components and Calculation of the Merchant Function Charge (“MFC”)**
- **PECO Exhibit MAM-3: Purchase of Receivables (“POR”) Discount Rates from Gas Supplier Coordination Tariff**

**PECO Statement No. 9: Doreen L. Masalta**

- **PECO Exhibit DLM-1: PECO Natural Gas Energy Efficiency Programs - 2023 Measure Study**
- **PECO Exhibit DLM-2: Historic and Forecasted EE&C Program Information (2023-2027)**

**PECO Statement No. 10: Jacqueline F. Golden**

**Volume IV**

**Defined Filing Requirements**

**Section 53.53 – Valuation - I-A and I-C**

**Defined Filing Requirements**

**Section 53.53 – Rate of Return - II-A and II-C**

**Defined Filing Requirements**

**Section 53.53 – Balance Sheet & Operating Statement - III-A**

**Defined Filing Requirements**

**Section 53.53 – Balance Sheet & Operating Statement - III-E**

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**Defined Filing Requirements**

**Section 53.53 – Rate Structure - IV-B**

**Defined Filing Requirements**

**Section 53.64(c) Gas Supply**

**Supplemental Data Responses**

**Cost of Service (COS)**

**Supplemental Data Responses**

**Rate of Return (ROR)**

**Volume VI**

**Supplemental Data Responses**

**Rate of Return (ROR) cont.**

**Supplemental Data Responses**

**Revenue Requirements (RR)**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION</b>	:	
	:	
v.	:	<b>DOCKET NO. R-2024-3046932</b>
	:	
<b>PECO ENERGY COMPANY – GAS DIVISION</b>	:	
	:	

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of the **PECO Energy Company’s General Base Rate Filing for Gas Operations** on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA ELECTRONIC SERVICE**

Patrick M. Cicero  
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Office of Consumer Advocate  
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Dated: March 28, 2024

*Counsel for PECO Energy Company*