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May 16, 2024

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. PECO Energy Company; Docket No. R-2024-3048767**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the Philadelphia Area Industrial Energy Users Group ("PAIEUG"), in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this filing. If you have any questions regarding the document, please contact the undersigned. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Ryan Block".

Ryan Block  
MCNEES WALLACE & NURICK LLC

Counsel to the Philadelphia Area Industrial Energy Users Group

c: Chief Administrative Law Judge Charles E. Rainey, Jr. (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 Section 1.54 (relating to service by a participant).

### VIA E-MAIL

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Harrison Ryan Block

Counsel to the Philadelphia Area Industrial  
Energy Users Group

Dated this 16<sup>th</sup> day of May, 2024, in Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION	:	
	:	Docket No. R-2024-3048767
v.	:	
	:	
PECO ENERGY COMPANY	:	

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**PETITION TO INTERVENE OF  
THE PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP**

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TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to the provisions of 52 Pa. Code §§ 5.71-5.74, the Philadelphia Area Industrial Energy Users Group ("PAIEUG") hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, PAIEUG states as follows:

1. Petitioner is PAIEUG. The composition of PAIEUG is attached hereto as Appendix A. PAIEUG reserves the right to modify Appendix A throughout the course of this proceeding, as necessary.

2. The names and address of PAIEUG's attorneys are:

Charis Mincavage (I.D. No. 82039)  
Adeolu A. Bakare (I.D. No. 208541)  
Harrison Ryan Block (I.D. No. 334653)  
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3. On April 30, 2024, PECO Energy Company ("PECO" or "Company") submitted its preliminary Purchased Gas Cost ("PGC") filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission"), pursuant to Section 1307(f) of the Public Utility Code, 66 Pa. C.S. § 1307(f). According to the Company, on or about June 1, 2024, PECO will submit supporting testimony setting forth the Company's proposed gas recovery rates, effective for service rendered on and after December 1, 2024.

4. PAIEUG is an *ad hoc* group of energy-intensive customers receiving transportation-related services from PECO, including service under Rate TS-I (Gas Transportation Service – Interruptible) and Rate TS-F (Gas Transportation Service – Firm). PAIEUG members use substantial volumes of natural gas in their manufacturing and operational processes, and these natural gas costs are a significant element of their respective costs of operation. Any modification to PECO's rates regarding the nature of firm and interruptible transportation delivery service, retainage charges, pipeline capacity cost assignment, penalty charges, and daily and monthly imbalancing penalties may impact PAIEUG members' cost for natural gas service.

5. Therefore, consistent with 52 Pa. Code § 5.72(a), PAIEUG has a significant interest in this proceeding that is not represented by any other party of record. Accordingly, PAIEUG should be granted intervenor status in this proceeding.

**WHEREFORE**, the Philadelphia Area Industrial Energy Users Group respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide the Philadelphia Area Industrial Energy Users Group with full-party status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By *Harrison Ryan Block*

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Counsel to the Philadelphia Area Industrial  
Energy Users Group

Dated: May 16, 2024



**APPENDIX A**

**PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP**

The Boeing Company  
Cleveland Cliffs  
Einstein Healthcare Network  
GlaxoSmithKline  
Kimberly-Clark Corporation  
Main Line Health System  
Merck & Co., Inc.  
Saint Joseph's University  
Swarthmore College  
Temple University  
Thomas Jefferson University  
Villanova University