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September 11, 2024

VIA eFILING

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

**Re: Pennsylvania Public Utility Commission v.
PECO Gas Division
Docket Nos. R-2024-3046932**

Dear Secretary Chiavetta:

Attached please find in the above-captioned proceedings, the **Errata to the Main Brief of PECO Energy Company**, which was served on September 6, 2024 (the “Errata”).

As evidenced by the Certificate of Service, copies of the Errata are being served upon Administrative Law Judge Marta Guhl, Administrative Law Judge Darlene Heep, and all parties of record.

If you have any questions, please contact me directly at 215.963.5384.

Very truly yours,



Kenneth M. Kulak

KMK/nt

Enclosures

c: Per Certificate of Service (w/encls.)

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC
UTILITY COMMISSION**

v.

**PECO ENERGY COMPANY –
GAS DIVISION**

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DOCKET NO. R-2024-3046932

ERRATA

PECO Energy Company (“PECO” or the “Company”) hereby submits the following errata to the Main Brief of PECO Energy Company, which was served on September 6, 2024 in the above-captioned proceeding:

Reference	Reads	Should Read
p. 7	<p>Section 1330 of the Code provides that a public utility may propose alternative rates and rate mechanisms in a base rate proceeding.¹⁶ The Commission’s regulations also expressly state that an NGDC may propose a WNA in a base rate proceeding.¹⁷</p> <hr/> <p>¹⁶66 Pa.C.S. § 1330(b). <i>See also</i> 52 Pa. Code § 69.3301.</p> <p>¹⁷52 Pa. Code § 69.3303. The Commission further explained that a WNA, “if proposed and implemented with care, could balance utility and consumer needs by just and reasonable means that better ensure utility revenue recovery and system use.” <i>Fixed Utility Distribution Rates</i></p>	<p>Section 1330 of the Code provides that a public utility may propose alternative rates and rate mechanisms in a base rate proceeding.^{16,17}</p> <p style="text-align: center;">—</p> <hr/> <p>¹⁶ 66 Pa.C.S. § 1330(b). <i>See also</i> 52 Pa. Code § 69.3301.</p> <p>¹⁷[Reserved].</p>

	<i>Policy Statement, Final Policy Statement Order at 25, Docket No. M-2015-2518883 (July 11, 2019).</i>	
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A replacement page for page 7 of the Company's Main Brief is included as Attachment

A.

Respectfully submitted,



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Dated: September 11, 2024

Counsel for PECO Energy Company

ATTACHMENT A

should therefore reject each of IBEW’s proposals and approve the Settlement supported by the Joint Petitioners, with the WNA as proposed by PECO.

III. WEATHER NORMALIZATION ADJUSTMENT

A. PECO’s Proposed WNA

Section 1330 of the Code provides that a public utility may propose alternative rates and rate mechanisms in a base rate proceeding.^{16,17}

WNAs have been in place in the Commonwealth for over two decades. The Commission first approved a WNA for Philadelphia Gas Works (“PGW”) in 2002.¹⁸ Commission approval of a WNA for Columbia Gas of Pennsylvania (“Columbia”) followed in 2013.¹⁹ The Commission more recently approved WNAs for UGI Utilities, Inc. - Gas Division (“UGI”) in 2022²⁰ and National Fuel Gas Distribution Corporation (“NFG”) in 2023.²¹ And Peoples proposed a WNA in its most recent base rate case, which was approved by the Administrative Law Judge (“ALJ”) in a Recommended Decision and is currently before the Commission for review.²²

¹⁶ 66 Pa.C.S § 1330(b). *See also* 52 Pa. Code § 69.3301.

¹⁷ [Reserved].

¹⁸ *Pa. Pub. Util. Comm’n v. Phila. Gas Works*, Docket No. R-00017034 (Order entered Aug. 8, 2002).

¹⁹ *Pa. Pub. Util. Comm’n v. Columbia Gas of Pa., Inc.*, Docket No. R-2012-2321748 (Order entered May 23, 2013).

²⁰ *Pa. Pub. Util. Comm’n v. UGI Utilities, Inc. – Gas Div.*, Docket No. R-2021-3030218 (Opinion and Order entered Sept. 15, 2022)

²¹ *Pa. Pub. Util. Comm’n v. Nat’l Fuel Gas Distrib. Corp.*, Docket No. R-2022-3035730 (Order entered June 15, 2023).

²² *Pa. Pub. Util. Comm’n v. Peoples Nat. Gas Co. LLC*, Docket No. R-2023-3044549 (Recommended Decision issued July 15, 2024).

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CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of **the Errata to the Main Brief of PECO Energy Company** on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

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