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October 30, 2024

**VIA E-FILING**

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

RE: Philadelphia Gas Works (“PGW”) Annual Asset Optimization Plan for FY 2024  
and FY 2025 (Projected); Docket No. M-2024-

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works’ (“PGW”) Annual Asset Optimization Plan for FY 2024 and FY 2025 (Projected).

If you have any questions, please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in black ink that reads "Daniel Clearfield". The signature is written in a cursive, slightly slanted style.

Daniel Clearfield

DC/jls  
Enclosure

cc: Certificate of Service (via email only)

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's Annual Asset Optimization Plan FY 2024 and FY 2025 (Projected), upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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Date: October 30, 2024

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Daniel Clearfield, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Periodic Review of Philadelphia Gas Works' Long-Term Infrastructure Improvement Plan : Docket No. M-2024-  
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**PHILADELPHIA GAS WORKS  
ANNUAL ASSET OPTIMIZATION PLAN  
FY 2024 AND FY 2025 (PROJECTED)**

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**I. INTRODUCTION**

In accordance with 52 Pa. Code § 121.6, Philadelphia Gas Works ("PGW") submits its Annual Asset Optimization Plan ("AAO Plan") for the LTIP period September 1, 2023 - August 31, 2024, and September 1, 2024 - August 31, 2025 (Projected).

PGW's current LTIP ("LTIP III") was approved by the Pennsylvania Public Utility Commission ("Commission") on August 25, 2022,<sup>1</sup> and covers the five-year period beginning September 1, 2022 through August 31, 2027 (PGW's fiscal years 2023 through 2027). Previously, under PGW's first LTIP, on February 12, 2016, PGW filed a petition to modify the final year of the LTIP, consistent with the Commission's Order that approved an increase in PGW's Distribution System Improvement Charge ("DSIC") from 5% to 7.5%. The Commission approved PGW's requested LTIP modification by Order dated June 9, 2016.<sup>2</sup>

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<sup>1</sup> See Docket No. P-2022-3032303, Opinion and Order entered August 25, 2022.

<sup>2</sup> See Docket No. P-2015-2501500, Opinion and Order entered January 28, 2016.

The current LTIIIP (“LTIIIP III”) modified the cast iron removal categories in PGW’s Accelerated Replacement Program by combining 12” and Larger LP/IP and 12” and Larger HP into 12” and Larger All Pressures (LP/IP/HP) to allow for more flexibility in the design and conceptualization of main replacement projects. PGW continues to target the riskiest assets for replacement as identified by DNV’s Mains Replacement Prioritization software.

This is the eleventh AAO Plan submitted by PGW detailing its progress in removing at-risk main, which is financed by both PGW's current base rates and PGW's DSIC.

In FY 2024, PGW removed 32.25 miles of cast iron main from inventory, compared to the LTIIIP goal of 30.40 miles. Actual replacement in FY 2024 exceeded the FY 2024 LTIIIP goal by 1.85 miles.

In FY 2025, PGW is projecting to replace 37.69 miles of at-risk main. This projection is 6.14 miles above the FY 2025 approved LTIIIP mileage of 31.55 miles. This includes 6.01 miles of cast iron replacement funded by the U.S. Department of Transportation’s (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) Natural Gas Distribution Infrastructure Safety and Modernization (NGDISM) grant.

## **II. MATERIAL REQUIRED BY 52 PA. CODE § 121.6**

The Commission's regulations, at section 121.6,<sup>3</sup> require a utility's AAO Plan to provide a description of the eligible property repaired, improved, and replaced in the prior twelve-month period, as well as a description of the eligible property projected to be repaired, improved, and replaced in the upcoming twelve-month period, sufficient to show that the utility is in substantial compliance with its approved LTIIIP.

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<sup>3</sup> 52 Pa. Code § 121.6.

(1) Description of eligible property repaired, improved, and replaced in the prior twelve-month period (FY 2024) and projection of eligible property to be repaired, improved, and replaced in the upcoming twelve-month period (FY 2025):

<b>FY 2024 Annual Asset Optimization Plan</b>				
<b><i>QUANTITIES in miles</i></b>	<b><u>FY 2024</u></b>		<b><u>FY 2025</u></b>	
	<b>LTIP</b>	<b>Actual</b>	<b>LTIP</b>	<b>Projected</b>
<b><u>BASELINE PROGRAM</u></b>				
<b>8" &amp; Smaller LP/IP</b>	<b>18.00</b>	<b>17.98</b>	<b>18.00</b>	<b>18.00</b>
<b>12" &amp; Larger LP/IP</b>	<b>N/A</b>	<b>0.31</b>	<b>N/A</b>	<b>N/A</b>
<b>12" &amp; Larger HP</b>	<b>N/A</b>	<b>0.00</b>	<b>N/A</b>	<b>N/A</b>
<b>Baseline Totals</b>	<b>18.00</b>	<b>18.29</b>	<b>18.00</b>	<b>18.00</b>
<b><u>ACCELERATED PROGRAM</u></b>				
<b>12" &amp; Larger All Pressures</b>	<b>5.40</b>	<b>6.65</b>	<b>5.30</b>	<b>5.40</b>
<b>8" &amp; Smaller LP/IP</b>	<b>7.00</b>	<b>7.31</b>	<b>8.25</b>	<b>8.28</b>
<b>Abandonment for Non-Use</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>ACCELERATED TOTALS</b>	<b>12.40</b>	<b>13.96</b>	<b>13.55</b>	<b>13.68</b>
<b><u>NGDISM PHMSA*</u></b>				
<b>8" &amp; Smaller LP/IP</b>	<b>N/A</b>	<b>N/A</b>	<b>0.00</b>	<b>6.01</b>
<b>Yearly Totals</b>	<b>30.40</b>	<b>32.25</b>	<b>31.55</b>	<b>37.69</b>

\* Natural Gas Distribution Infrastructure Safety & Modernization ("NGDISM"). PGW is expecting to incur some indirect costs that are not reimbursable through the NGDISM grant.

(2) Detailed description of facilities repaired, improved, and replaced in FY 2024 (Accelerated):

^Final costs for some projects were estimated from Contractor invoices and have not been paid to date

Project Location	Projected Removal	Projected Cost	Low	All Pressures	Total Footage	Actual Cost
			10" and Smaller	12" and Larger		
3200-3300 Willits Rd	2,377	\$1,883,446	0	2,342	2,342	\$1,919,168
2000 Moyamensing Ave	178	\$314,798	0	186	186	\$821,150
600-800 N 46th, 800 N 44th, 4400-4500 Parrish	2,577	\$2,496,274	0	2,571	2,571	\$2,293,922
100 S 36th St, 3400-3500 Walnut St*	647	\$164,153	0	683	683	\$353,797
2800 Old Passyunk, 2400-2500 S 28th St	5,733	\$9,964,976	0	5,555	5,555	\$12,493,559
30th & Market	255	\$75,600	0	186	186	\$137,436
4700-4800 Baltimore, 4900 Florence, 700 S 49th, 4900 Pentridge	4,110	\$1,567,025	3,057	1,036	4,093	\$1,588,355
5700-5800 McMahon, 700 E Price, 700-900 Cheltenham, 5600-5700 Chew	4,337	\$1,330,222	2,885	1,453	4,338	\$1,648,610
2300 77th Ave, 2200 Washington, 2300 Cheltenham	3,579	\$1,264,979	2,388	1,038	3,426	\$1,047,837
1300 S. Ruby St, 1300 S. 53rd St, 1200. S. Wilton St, 5100-5300 Chester Ave, 1100 S. Paxon St, 1000-1200 S. 52nd St	4,735	\$1,787,790	2,063	2,629	4,692	\$1,278,997
6900-7000 Stenton Ave, 2200 Stenton Ave, 5500-6500 Wister St*	7,746	\$6,432,048	123	7,841	7,964	\$5,727,612
3200-3500 N 17th St, 1600-1700 W Westmoreland St, 1600-1700 W Ontario St	2,719	\$1,072,167	601	2,052	2,653	\$902,219
1400-1700 W. Venango St, 3400-3500 N. 15th St.*	2,403	\$1,136,519	182	2,331	2,513	\$1,378,045

Project Location	Projected Removal	Projected Cost	Low	All Pressures	Total Footage	Actual Cost
			10" and Smaller	12" and Larger		
300, 400, 500 W Springfield Ave, 7700,7800 Cherokee St, 7700,7800 Huron St, 7800 Cresheim St	6,317	\$2,409,557	3,446	3,092	6,538	\$1,217,522
5000-5200 Torresdale, 2000 Wakeling, 2000 Haworth, 2000-2100 Granite, 2100 Bridge 2100 Scattergood, 5200 Tulip, 5100 Ditman*	6,214	\$3,641,851	4,084	2,124	6,208	\$3,287,296
4300-4400 Vista, 4400-4500 Bleigh	2,901	\$612,990	2,814	0	2,814	\$648,132
3200 N Stillman St, 2400 Hilton St, 3200 N Bambrey St, 2500 W. Willard St	1,779	\$372,742	1,788	0	1,788	\$377,035
2100 Grange, 2100 Church, 6000 Beechwood	1,261	\$355,311	1,254	0	1,254	\$314,041
500 Dudley St, 500 Hoffman St, 500 McKean St, 1800-2000 S. 6th St	1,858	\$680,165	1,869	0	1,869	\$457,551
3600-3700 N 13th St. 1200 W Airdrie St, 1200-1300 E Erie Ave, 3700 Old York Rd, 1300 W Venango St	2,304	\$792,798	2,395	0	2,395	\$856,364
900-1000 Paxon, 5100 Warrington, 1000 51st, 5100 Springfield	1,997	\$459,313	1,984	0	1,984	\$467,709
4700-4900 Chester, 4800 Springfield, 1000 S 47th, 1000 S 49th	3,762	\$1,026,655	3,802	0	3,802	\$903,530
6400 Lansdowne Ave, 600-900 Marlyn St, 600-700N 64th St	3,848	\$1,283,070	3,863	0	3,863	\$1,038,061
<b>Total Cast Iron Main Footage Removed / Total Cost</b>	73,637	\$41,124,449	38,598	35,119	73,717	\$41,157,948
<b>Mileage</b>	<b>13.95</b>		<b>7.31</b>	<b>6.65</b>	<b>13.96</b>	

\*Projects were not scheduled for FY 2024 replacement at the time of PGW's FY 2023 AAOP submission

(3) Detailed description of facilities repaired, improved, and replaced in FY 2024 (Baseline):

^Final costs for some projects were estimated from Contractor invoices and have not been paid to date

\*Projects highlighted in red had abandonment spanning multiple years. The planned/actual expenditures are based on the percentage completed in FY 2024. The projected removal for these projects is the same as the actual removal to correlate with the expenditures

Project Location	Projected Cost	Actual Cost	Projected Removal	Actual Removal
W-20649 Leverington Ave	\$580,613.10	\$1,035,722.79	1856	1856
300 N 40th St, 300 State St, 300 N 39th St, 400 Wiota St, 3800 Lancaster Ave, 3800 Pearl St, 40-4100 Baring St	\$14,143.32	\$13,729.34	52	52
W-20629-D 600 N.40th St, 4000 Aspen St, 3500 Wallace St	\$162,188.25	\$186,092.94	721	721
500 Carver	\$159,536.68	\$226,434.09	1194	1194
400 S 55th St 3-400 S 56th St 54-5600 Pine St 55-5600 Osage 55-5600 Addison	\$248,210.95	\$193,984.33	935	935
2300 Cheltenham, 78th ave, 79th ave	\$696,388.00	\$752,488.34	2626	2603
4300-4500 Osage Ave, 4300 Larchwood Ave, 400 S 44th St, 400 S. 43rd St	\$1,046,966.00	\$962,978.58	4371	4130
1600-1700 Mohican St, 1500-1700 Mayland St, 7300 Rodney St, 7300 Woolston Ave	\$1,306,035.00	\$1,197,002.68	5401	5913
4400-4500 Larchwood Ave, 4300-4500 Baltimore Ave, 4300 Pine St, 500 Melville St, 400-500 S. 44th St, 400-500 S. 45th St	\$1,414,899.00	\$1,148,181.40	4642	4640
6800-6900 Forrest Ave	\$433,975.00	\$422,068.84	1601	1621
1900 Fitzgerald St, 1900 Durfor St, 2200 Garnet St, 2200-2300 S 20th St, 1900 Wolf St	\$560,136.00	\$563,277.71	2143	2143
7400 Edmund, 4700 Vista, 4700 Loring	\$348,948.00	\$368,503.87	1614	1602
600-900 Kenmore Rd, 600 Atwood Rd, 6500 Harlan Rd, 6500 Lansdowne Rd	\$972,249.00	\$955,917.98	3646	3642
1100-1200 E Passyunk Ave, 700-800 Federal St, 1100 S 8th St, 700 Ellsworth St	\$907,636.00	\$485,528.16	2018	2022
5800 Magdalena, 600 Roxborough, 600 Rector, 600 Jamestown, 600 Wendover	\$817,951.00	\$731,062.12	3005	3037
1100 Divinity St, 1100 51st St, 5000 Springfield Ave	\$256,845.00	\$198,987.25	955	979
600 Fountain, 6400 Henry Ave	\$465,374.00	\$424,210.42	1760	1760

<b>Project Location</b>	<b>Projected Cost</b>	<b>Actual Cost</b>	<b>Projected Removal</b>	<b>Actual Removal</b>
5200-5300 Woodland, 1700 Ruby, 1600-1700 53rd, 1600 Lindenwood,5200-5300 Paschall	\$978,870.00	\$860,387.83	4119	4216
55-5600 Whitby Ave, 55-5600 Malcolm St, 55-5600 Hadfield St, 55-5600 Willows Ave, 1200 S 56th St	\$812,552.00	\$857,095.72	3697	3789
2000 Hazzard, 2000 Sergeant, 2500 Coral,1900 Huntingdon	\$534,857.00	\$579,678.85	1353	1307
4800 N 7th St, 4800 N 8th St, 47-4800 N 9th St, 47-4800 Hutchinson St	\$714,079.00	\$656,103.83	3306	3261
4900-5000 N 8th, 4900-5000 Franklin	\$589,729.00	\$549,285.20	2642	2557
7600-7800 Navajo, 000-100 w Moreland, 7700-7800 Crefeld, 000-100 Mermaid, 7700 Cross, 7700-7800 Lincoln,100 Springfield	\$989,847.00	\$1,308,760.70	3233	3181
200 S 22nd St, 200 S Van Pelt St, 2200 St James Place	\$170,163.00	\$177,867.26	634	647
4700 A St, 4700 Ella St, 200 E Mentor St	\$193,074.00	\$119,725.40	767	758
4600 Newhall St, 4800 Pulaski Ave	\$92,257.00	\$112,736.76	353	361
2000 56th, 1800 Allison, 5500-5600 Woodland, 5500 Paschall	\$597,335.00	\$496,876.11	2588	1368
1600-1700 Worrell St	\$142,985.00	\$160,330.90	632	634
4700-4800 Warrington Ave, 4800 Springfield Ave, 4800 Windsor Ave, 800-900 S. 49th St, 900 S. 48th St	\$1,400,814.00	\$1,275,629.46	5517	5595
2400 N 29th St	\$137,378.00	\$73,534.25	502	504
1300 N Broad St	\$165,837.00	\$209,273.12	868	858
500 Cantrell St, 500 Winton St, 2100 S 5th St, 2200 S Fairhill St, 2200 S Reese St	\$329,653.00	\$336,644.12	1255	1244
800 W Oxford St	\$100,916.00	\$101,203.53	346	337
700-800 Watkins, 700-800 Pierce St, 1700 S 8th St,1700 S 7th St	\$624,519.00	\$521,933.78	1874	1872
1200-1300 S Carlisle St	\$226,770.00	\$263,734.30	934	917
1000 S Ithan St, 1300 S 57th St, 5500-5600 Broomall St, 1400 S 58th St, 5700 Malcolm St	\$500,478.00	\$418,937.68	2531	2450
600 Hoffman St	\$56,489.00	\$107,157.97	388	371
5600 Litchfield St, 5600-5700 Belmar St, 1700 S 58th St	\$511,009.00	\$473,285.74	2257	2284
1200 Ritner St	\$53,534.00	\$81,156.19	206	224

<b>Project Location</b>	<b>Projected Cost</b>	<b>Actual Cost</b>	<b>Projected Removal</b>	<b>Actual Removal</b>
2600-2700 B St, 300 E Sterner St, and 2600 Potter St	\$90,721.00	\$121,822.06	610	643
7300 Ditman St	\$85,566.00	\$100,790.46	305	308
2800-2900 Ridge Ave, 2900 Diamond St, 1900-2000 N 29th St, 2700 W Susquehanna	\$1,054,196.00	\$647,858.37	3349	3317
2502 Cardinal Ave (Saint Joseph University)	\$14,996.00	\$212,179.56	148	73
700 Winton St, 800-900 Cantrell St	\$309,394.00	\$310,491.03	1174	1991
5200-5300 Addison St, 5400 Larchwood St, 5400 Irving St, 200 S 55th St, 5200-5400 Pine St	\$826,631.00	\$563,362.43	3571	3163
Miscellaneous Abandonment	\$3,327,000.00	\$2,532,996.68	1215	9513
<b>Total Planned &amp; Actual Expenditures / Total Planned &amp; Actual Mileage</b>	<b>\$26,023,743.00</b>	<b>\$24,097,010.00</b>	<b>16.84</b>	<b>18.29</b>

(4) Detailed description of facilities projected to be repaired, improved, replaced in FY 2025:

Project Location	Low	All Pressures	Projected Footage	Estimated Cost
	10" and Smaller	12" and Larger		
3300-3500 Chestnut Street		2,558	2,558	\$2,371,266
2400-2500 S 58th Street, 5800-5900 Lindbergh Boulevard		2,262	2,262	\$4,751,725
700 E Passyunk Ave, 300-400 Bainbridge St		1,243	1,243	\$1,210,662
1400-1500 Olney Ave, 1500 Chew St, 5600 Sydenham St, 5600 16th St	653	1,544	2,197	\$927,894
6300-6400 Sprague St., 900 Cliveden St., 6400 Boyer St.	856	279	1,135	\$428,298
2100 Chestnut St	7	375	382	\$182,903
2600 Coral St, 2600 Amber St, 2700 Amber St	1,157	554	1,711	\$622,727
100-1300 W Olney, 5200-5500 N Mascher	72	8,735	8,807	\$8,808,354
7900 Rising Sun Ave, 900-1000 Rhawn St, 900-1000 Ripley St	3,245	1,653	4,898	\$1,873,264
1400-1900 W Olney Ave	181	3,876	4,057	\$3,612,519
500 Hellerman/Levick Streets, 6400 Rising Sun Ave., 6400 Palmetto/Bingham Streets.	2,637	689	3,326	\$1,123,411
1100 Lehigh, 2700-3000 N 12th, 1300 W Clearfield, 3100-3300 N Park, 1300 Allegheny	113	4,785	4,898	\$6,141,309
2500 Jasper St., 1800-1900 Sergeant St., 1900-2000 Firth St.	1,616		1,616	\$491,011
1800 S 2nd St, 200 McClellan St	998		998	\$307,496
100 W Tabor Rd., 5400 Tennis Ave.	842		842	\$271,949

<b>Project Location</b>	<b>Low</b>	<b>All Pressures</b>	<b>Projected Footage</b>	<b>Estimated Cost</b>
	<b>10" and Smaller</b>	<b>12" and Larger</b>		
7700-7900 Rugby Rd	3,180		3,180	\$713,829
7500-7600 Rugby St.	2,302		2,302	\$658,631
1600 Filmore St., 1600 Harrison St., 4800 Darrah St., 4900 Frankford Ave., 1600 Allengrove St., 4900 Darrah St.	2,045		2,045	\$638,112
6400-6500 N 5th, 400 Acker, 500 W 65th Ave	1,936		1,936	\$660,654
1900 56th St., 1800 56th St., 5600 Woodland Ave, 5500 Upland St.	1,863		1,863	\$535,228
300-400 E. Vernon St	1,192		1,192	\$339,575
100 N 20th St.	271		271	\$125,426
1200 Pratt St, 5200 Sylvester St, 5200-5300 Oakland St.	2,254		2,254	\$514,836
200 S 23rd St	98		98	\$34,680
400 Pensdale St, 400 Rector St, 4200 Pechin St	1,844		1,844	\$397,664
700-900 Glenview, 700-900 Longshore	7,880		7,880	\$2,212,873
1600 W Dauphin St.	234		234	\$137,564
1400-1500 Butler St./1400-1600 Erie Ave./3700 Sydenham Ave./3700 N. 16th St./3800 N. 15th St./3700-3800 Germantown Ave.	5,305		5,305	\$1,593,355
2500 Townsend St, 2400 E Norris St, 2300 Almond St, 2300 Mercer St	912		912	\$352,402
<b>Total Cast Iron Main Footage Removed / Total Cost</b>	<b>43,693</b>	<b>28,553</b>	<b>72,246</b>	<b>42,039,617</b>
<b>Mileage</b>	<b>8.28</b>	<b>5.40</b>	<b>13.68</b>	

### **III. CONCLUSION**

Last year PGW fell short of the 12” and Larger All Pressures projected at-risk main removal mileage set forth in the approved LTIIIP for FY 23 by .98 miles. The shortfall was attributed to ongoing supply chain difficulties as a result of the Covid-19 Pandemic and difficulty obtaining permits from PennDOT and the City of Philadelphia to perform work on City and State roadways. This year PGW made up for that shortfall plus an additional .27 miles of 12” and Larger All Pressures at-risk main removal. PGW exceeded the total Baseline goal and Accelerated 8” and Smaller LP/IP goal by a combined .60 miles in FY 24, which brings PGW’s cumulative at-risk main removal above the total projected mileage in the approved LTIIIP by 4.33 miles.

PGW exceeded the projected accelerated costs in the LTIIIP by \$2,347,484.88 which can be attributed to the additional mileage that was completed to make up the shortfall from FY 23. PGW replaced 1.56 more accelerated miles than originally projected in the LTIIIP for FY 24 while only exceeding the LTIIIP projected expenditures by 6%.

For FY 2025, PGW is utilizing funding from the Natural Gas Distribution Infrastructure Safety and Modernization (NGDISM) grant from the U.S. Department of Transportation’s (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) which will enable the replacement of an additional 6.01 miles of 8” & smaller cast iron main, in addition to PGW’s baseline and accelerated goals. To recap, the FY 2025 projection shows that PGW’s performance aligns well with the requirements outlined in 52 Pa. Code § 121.6. PGW has substantially adhered to the planned schedule for repairs, improvements, and replacements of eligible properties as outlined in its current Long-Term Infrastructure Improvement Plan (LTIIIP) over the corresponding twelve-month periods.