



McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Ryan Block
Telephone: 717.237.5446
Fax: 717.237.5300
rblock@mcneeslaw.com

February 10, 2025

VIA E-MAIL

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works 2025-2026 Gas Cost Rate Filing; Docket No. R-2025-3053241

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the Philadelphia Industrial and Commercial Gas Users Group (“PICGUG”), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

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

Ryan Block
MCNEES WALLACE & NURICK LLC

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 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA E-MAIL

Deanne M. O'Dell, Esq.
Eckert Seamans Cherin & Mellot
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com

Graciela Christlieb, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
Graciela.Christlieb@pgworks.com

Harrison W. Breitman, Esq.
Ryan Morden, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
hbreitman@paoca.org
RMorden@paoca.org
ra-oca@paoca.org

NazAarah Sabree
Office of Small Business Advocate
Commerce Building, Suite 202
300 North Second St.
Harrisburg, PA 17101
Ra-sba@pa.gov

Allison C. Kaster, Esq.
Michael Podskoch, Jr., Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
akaster@pa.gov
mpodskoch@pa.gov



Harrison Ryan Block

Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

Dated this 10th day of February, 2025, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2025-3053241
 :
 Philadelphia Gas Works 2025-2026 Gas Cost :
 Rate Filing :

**PETITION TO INTERVENE OF THE
PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

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

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

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

Charis Mincavage (Pa. I.D. 82039)
Adeolu A. Bakare (Pa. I.D. 208541)
Harrison Ryan Block (Pa. I.D. 334653)
McNEES WALLACE & NURICK LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
Phone: (717) 232-8000
Fax: (717) 237-5300
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
rblock@mcneeslaw.com

3. On January 31, 2025, Philadelphia Gas Works ("PGW") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") its Gas Cost Rate ("GCR") pre-filing pursuant to Section 1307(f) of the Public Utility Code, 66 Pa.C.S. § 1307(f). Pursuant to this pre-filing, PGW is not proposing any rate structure or rate allocation changes at this time. PGW's supplemental filing is expected on or around March 1, 2025.

4. PICGUG is an *ad hoc* group of large volume natural gas customers receiving service from PGW under various rate schedules, including interruptible transportation. PICGUG members use substantial volumes of natural gas in their businesses, and natural gas costs comprise a significant element of their respective costs of operation. PGW's GCR proposal may affect several of the Company's rate schedules, including schedules under which PICGUG members receive service. As a result, any PUC determination regarding PGW's 2025 GCR may impact PICGUG members' interests.

5. Therefore, consistent with 52 Pa. Code § 5.72(a), PICGUG has a significant interest in this proceeding that is not represented by any other party of record. *See* 52 Pa. Code § 5.72(a). Accordingly, the Commission should grant PICGUG intervenor status in this proceeding.

WHEREFORE, the Philadelphia Industrial and Commercial Gas Users Group respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide PICGUG with intervenor party status.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By *Harrison Ryan Block*

Charis Mincavage (Pa. I.D. 82039)

Adeolu A. Bakare (Pa. I.D. 208541)

Harrison Ryan Block (Pa. I.D. 334653)

100 Pine Street

P.O. Box 1166

Harrisburg, PA 17108-1166

Phone: (717) 232-8000

Fax: (717) 237-5300

cmincavage@mcneeslaw.com

abakare@mcneeslaw.com

rblock@mcneeslaw.com

Counsel to the Philadelphia Industrial
and Commercial Gas Users Group

Dated: February 10, 2025

APPENDIX A

PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP

Einstein Healthcare Network

Newman & Company

Philadelphia College of
Osteopathic Medicine

Temple University

Thomas Jefferson University