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March 7, 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 Prehearing Memorandum 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 black ink that reads 'Charis Mincavage'.

Charis Mincavage  
MCNEES WALLACE & NURICK LLC

c: Deputy Chief Administrative Law Judge Christopher P. Pell ([cpell@pa.gov](mailto:cpell@pa.gov))  
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

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Charis Mincavage

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

Dated this 7<sup>th</sup> day of March, 2025, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PREHEARING MEMORANDUM OF THE  
PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

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Pursuant to the March 3, 2025, Prehearing Conference Order issued by Deputy Chief Administrative Law Judge (“DCALJ”) Christopher P. Pell, the Philadelphia Industrial and Commercial Gas Users Group (“PICGUG”) hereby submits this Prehearing Memorandum in the above-captioned proceeding.

**I. HISTORY OF THE PROCEEDING**

On January 31, 2025, Philadelphia Gas Works (“PGW” or “Company”) 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).

On February 10, 2025, PICGUG filed a Petition to Intervene in this proceeding. A description of PICGUG is set forth in Paragraphs 1 and 4 of its Petition to Intervene.

On February 28, 2025, PGW submitted to the Commission its supplemental filing, which contained tariff revisions, supporting information, and prepared direct testimony.

A Prehearing Conference has been scheduled in this proceeding for March 11, 2025.

## **II. COUNSEL**

PICGUG is represented in this matter by:

Charis Mincavage (Pa. I.D. No. 82039)  
Adeolu A. Bakare (Pa. I.D. No. 208541)  
Harrison Ryan Block (Pa. I.D. 334653)  
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Additionally, Charis Mincavage will speak as the lead attorney for purposes of the Prehearing Conference.

## **III. ANTICIPATED ISSUES AND SUB-ISSUES**

Because changes to the Company's gas costs may affect its members, PICGUG is concerned with the modifications to the GCR proposed in this proceeding. Similarly, PICGUG is concerned with any issues that may arise regarding interruptible transportation service, proposed retainage fees, pipeline capacity cost assignment, penalty charges, and daily and monthly imbalance penalties. PICGUG anticipates pursuing these issues during this proceeding, as necessary, and reserves the right to raise further issues and to respond to all matters raised by other parties.

## **IV. PROPOSED WITNESSES**

PICGUG is currently evaluating whether it will sponsor testimony in this proceeding. If PICGUG opts to sponsor testimony, it will immediately inform the parties and the DCALJ of any intended witnesses and their areas of testimony. PICGUG also intends to participate in this

proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

**V. PROPOSED SCHEDULE AND DISCOVERY RULES**

PICGUG will cooperate with the DCALJ and the parties at the Prehearing Conference to develop a complete procedural schedule, including the amount of hearing time needed. PICGUG will also cooperate with the DCALJ and the parties to develop appropriate discovery rules in accordance with the Commission's regulations and any DCALJ directives.

**VI. POSSIBILITY OF SETTLEMENT**

PICGUG is willing to participate in discussions with the parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By  \_\_\_\_\_

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Counsel to the Philadelphia Industrial  
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Dated: March 7, 2025