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March 7, 2025

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Philadelphia Gas Works 2025-2026 Gas Cost Rate Filing – Docket No. R-2025-3053241

Office of Consumer Advocate v. Philadelphia Gas Works – Docket No. C-2025-3053308

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' ("PGW") Prehearing Memorandum with regard to the above-referenced matters. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

Graciela Christlieb, Senior Attorney
Philadelphia Gas Works
800 W. Montgomery Ave
Philadelphia, PA 19122

DMO/lww
Enclosure

cc: Hon. Christopher Pell w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the PGW's Prehearing Memorandum upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

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Deanne M. O'Dell, Esq.

Dated: March 7, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2025-3053241
	:	
	:	
Office of Consumer Advocate	:	Docket No. C-2025-3053308
	:	
v.	:	
	:	
Philadelphia Gas Works	:	
	:	

**PREHEARING MEMORANDUM
OF PHILADELPHIA GAS WORKS**

Pursuant to 52 Pa Code § 5.223, the Prehearing Conference Order dated March 3, 2025 and in anticipation of the Initial Telephonic Prehearing Conference scheduled before Deputy Chief Administrative Law Judge Christopher P. Pell on Tuesday, March 11, 2025, Philadelphia Gas Works (“PGW”) submits this Prehearing Memorandum.

I. BACKGROUND

1. On January 31, 2025, PGW filed its supporting information for the prefiling for its annual 2025-2026 Gas Cost Rate (“GCR”).
2. Pursuant to the Commission’s approval in its 2022-2023 GCR,¹ PGW departed from certain requirements of 52 Pa. Code Sections 53.45(b), 53.64(c), 53.68(a) and 53.64(i)(5)(i) addressing the timing of bill inserts, public notice and underlying data to be relied upon for the March 1, 2025 quarterly 1307(f) filing. PGW has completed or is in the process of completing

¹ *Pennsylvania Public Utility Commission, et. al v. Philadelphia Gas Works*, Docket Nos. R-2022-3030686, C-2022-3030978, C-2022-3030971, Order entered July 14, 2022, Ordering Paragraph 6 at 2-3.

customer notice requirements including bill cycle inserts and publication in local newspapers consistent with these Commission-approved requirements.

3. On February 7, 2025, the Office of Consumer Advocate (“OCA”) filed a complaint which is docketed at C-2025-3053308. Consistent with 52 Pa. Code § 5.61(d), PGW did not file answers to the Complaints.

4. On February 10, 2024, the Philadelphia Industrial and Commercial Users Group (“PICGUG”) filed a Petition to Intervene. PGW does not object to PICGUG’s intervention.

5. On February 13, 2023, the Bureau of Investigation and Enforcement (“I&E”) filed a Notice of Appearance.

6. On February 25, 2025, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance.

7. On February 28, 2025, PGW filed its Section 1307(f) filing which included: proposed tariff revisions (Supplement No. 177 to PGW’s Gas Service Tariff – Pa P.U.C. No. 2 and Supplement No. 120 to PGW’s Gas Supplier Tariff – Pa P.U.C. No. 1); supporting information regarding the computation of annual purchased gas costs for twelve months ending August 31, 2025, and the direct testimony of Florian Teme (PGW St. 1) and Ryan E. Reeves (PGW St. 2).

II. DISCOVERY

1. For the benefit of the parties, documents exchanged in discovery will be made available via a secured Citrix Sharefile folder. To receive access, please contact Deanne O’Dell.

2. Consistent with the discovery modifications adopted in prior GCR proceedings and in consultation with the parties to this proceeding, PGW is amenable to discovery modifications proposed by OCA and consistent with prior GCR proceeding. **However, PGW**

respectfully requests that parties serve answers to written interrogatories on or after the due date for service of non-company direct within five (5) calendar days of service of the interrogatories due to the need for a shortened timeframe for written rebuttal testimony as a result of the other time constraints required by this proceeding.

III. FACTUAL AND LEGAL ISSUES

This proceeding will focus on whether PGW's proposed 2025-2026 GCR, claimed realized natural gas expense, GCR Expense, and prior years' over-/under-collections are just, reasonable, and in pursuit of a least cost fuel procurement and other standards set forth in 66 Pa.C.S. §§ 1307(f), 1317 and 1318. In addition, the proceeding will focus on whether PGW's proposed Tariff Supplement No. 177 to PGW's Gas Service Tariff – Pa P.U.C. No. 2, adjusting the GCR, and making corresponding adjustments to the Price-to-Compare, Efficiency Cost Recovery Surcharge, and Universal Service and Energy Conservation Surcharge to be effective September 1, 2025, and to the proposed Tariff Supplement No. 120 to PGW's Gas Supplier Tariff – Pa P.U.C. No. 1 to adjust the load balancing charge, are just, reasonable and otherwise consistent with law. PGW submits that its proposals, as outlined in its GCR filing, are just, reasonable, and otherwise consistent with the law.

IV. SERVICE OF DOCUMENTS

PGW requests that all documents be served on:

Deanne O’Dell, Esquire – **Speaking for PGW at the Pre-Hearing Conference**

Daniel Clearfield, Esquire

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Legal Department

Philadelphia Gas Works

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(215) 684-6164

graciela.christlieb@pgworks.com

PGW agrees to receive service of documents electronically in this proceeding.

V. PROCEDURAL SCHEDULE

Discussions regarding scheduling are on-going among the parties. At the time of filing of this Prehearing Memo, PGW supports the below schedule. Any agreements reached by the parties to shift any of these proposed dates will be shared during the prehearing conference. Based on prior experience, one day of hearing will be sufficient and the Company requests that the hearing be held telephonically.

Event	PGW Proposed Dates
Other Parties Direct Testimony	Friday, March 28, 2025
Rebuttal Testimony	Tuesday, April 8, 2025
Surrebuttal Testimony	Monday, April 14, 2025
Written Rejoinder (best efforts) or Oral Rejoinder at hearing	Wednesday, April 16, 2025
Evidentiary Hearings	Wednesday, April 16, 2025
Close of Record	Friday, April 18, 2025
Main Briefs Due	Tuesday, May 6, 2025
Reply Briefs Due**	Friday, May 16, 2025

***Firm Date Set by ALJ*

VI. WITNESSES

PGW expects to submit the testimony of the following witnesses:

- Florian Teme, Vice President, Marketing, Sales and Energy Planning at PGW. The issues Mr. Teme will address are set forth in his Direct Testimony dated February 28, 2025. Mr. Teme's telephone number is 215.684.6463.
- Ryan E. Reeves, Director of Gas Supply, Transportation and Control at PGW. The issues Mr. Reeves will address are set forth in his Direct Testimony dated February 28, 2025. Mr. Reeves' telephone number is 215.787.5103.

The business address for PGW's witnesses is 800 W. Montgomery Ave., Philadelphia, PA 19122.

PGW reserves its right to modify this witness list prior to the submission of testimony into the record.

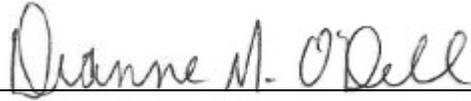
VII. PROTECTIVE ORDER

Consistent with prior GCR proceedings, PGW will be submitting a proposed protective order for entry by the ALJ in order to protect its confidential information from public release or being used for purposes other than this proceeding.

VIII. SETTLEMENT

PGW is willing to participate in settlement discussions and will be initiating such discussions as soon as the parties indicate that they have had sufficient time to review PGW's claims in its filing.

Respectfully Submitted,



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Daniel Clearfield, Esquire
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Attorneys for Philadelphia Gas Works

Dated: March 7, 2025