

COMMONWEALTH OF PENNSYLVANIA



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March 19, 2025

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
PO Box 3265
Harrisburg, Pa. 17105-3265

Re: Petition of Philadelphia Gas Works For
Waiver Of Statutory Definition
Of Fully Projected Future Test Year
Docket No. R-2025-3053112

Dear Secretary Chiavetta,

On February 27, 2025, Philadelphia Gas Works (PGW or Company) filed a Petition for Waiver of the Statutory Definition of the Fully Projected Future Test Year (FPFTY) in the above-referenced docket. In its Petition, PGW requests waiver of the statutory definition of FPFTY so that the FPFTY can be the twelve-month period starting September 1, 2025, and ending August 31, 2026, instead of the FPFTY commencing on November 1, 2025, which the statute obligates. Petition at 1,7. Based on its evaluation, PGW reasons that a waiver as requested would comport with their fiscal and budgetary requirements, provide ease as to the record in the above-referenced docket, and keep PGW administrative costs of compliance at a lower value. Petition at 2.

The OCA does not oppose the Company's proposal to waive the statutory definition of the FPFTY for purposes of this case to allow for the twelve-month period to begin on September 1, 2025. Therefore, the OCA does not oppose the currently pending Petition of Philadelphia Gas Works for Waiver of Statutory Definition of Fully Projected Future Test Year.

Sincerely,

A handwritten signature in blue ink that reads "K. Kennedy".

Katie Kennedy
Assistant Consumer Advocate
PA Attorney ID No. 317237

cc: Certificate of Service
Office of Administrative Law Judge
Office of Special Assistants

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3053112
	:	
Philadelphia Gas Works	:	
	:	

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s No Opposition Letter, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 19th day of March 2025.

SERVICE BY E-MAIL ONLY

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Respectfully submitted,

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Dated: March 19, 2025

/s/ Harrison W. Breitman
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