



Eckert Seamans Cherin & Mellott, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101

TEL 717 237 6000
FAX 717 237 6019
www.eckertseamans.com

Daniel Clearfield
717.237.7173
dclearfield@eckertseamans.com

March 26, 2025

VIA E-FILING

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

RE: **REVISED Philadelphia Gas Works (“PGW”) REVISED Annual Asset Optimization Plan for FY 2023; Docket No. M-2023-3043952**

Dear Secretary Chiavetta:

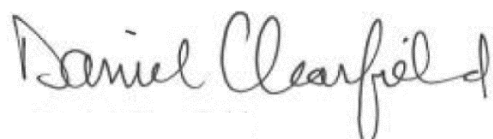
On October 31, 2023, Philadelphia Gas Works (“PGW”) filed its Annual Asset Optimization Plan for FY 2023 and FY 2024 (Projected) which was approved by Secretarial Letter dated January 18, 2024. Subsequently, PGW determined that there were additional steel pipe expenses that were not previously reported. Therefore, **enclosed for electronic filing, please find Philadelphia Gas Works (“PGW”) REVISED 2023 Annual Asset Optimization Plan, pages 4 and 5.**

For the 2023 AAOP, PGW originally claimed \$27,912,088.00 across 19 projects. The revised document includes an additional \$515,499.00, bringing the total to \$28,427,587.00. Revisions have been made to pages 4 & 5 and are enclosed herein. PGW respectfully requests that these revised pages replace the ones originally filed.

PGW is also filing revisions to its 2024 AAOP filed at Docket Number M-2024-3051918 consistent with the changes herein.

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

Sincerely,

A handwritten signature in cursive script that reads "Daniel Clearfield". The signature is written in black ink on a white background.

Daniel Clearfield

DC/jls
Enclosure

cc: Certificate of Service (via email only)
Matthew Stewart, TUS (via email only)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's REVISED Annual Asset Optimization Plan FY 2023, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email

Allison Kaster, Esq.
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
akaster@pa.gov

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov

Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
ra-oca@paoca.org

John W. Sweet, Esq.
Elizabeth R. Marx, Esq.
Ria M. Pereira, Esq.
Pennsylvania Utility Law Project
18 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

Todd S. Stewart, Esq.
Hawke McKeon & Sniscak LLP
100 North Tenth
Street Harrisburg, PA 17101
tsstewart@hmslegal.com

Charis Mincavage, Esq.
Adeolu Bakare, Esq.
McNees Wallace & Nurick
100 Pine Street
Harrisburg, PA 17101
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com

Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Ave.
Cambridge, MA 02140
rdk@indecon.com

Joline R. Price, Esq.
Robert W. Ballenger, Esq.
Community Legal Services, Inc.
1410 West Erie Avenue
Philadelphia, PA 19140
jprice@clsphila.org
rballenger@clsphila.org

Ernest Logan Welde, Esq.
Clean Air Council
135 S. 19th Street, Suite 300
Philadelphia, PA 19103
lwelde@cleanair.org

Cassandra R. McCrae, Esq.
Devin McDougall, Esq.
Earthjustice
1617 John F. Kennedy Blvd., Suite 1130
Philadelphia, PA 19103
cmccrae@earthjustice.org
dmcDougall@earthjustice.org

Mr. Jeffrey Pollock
J. Pollock, Inc.
12647 Olive Blvd., Suite 585
St. Louis, MO 63141
jcp@jpollockinc.com

Date: March 26, 2025

Harry S. Geller, Esq.
118 Locust Street
Harrisburg, PA 17101
hgellerpulp@palegalaid.net

Mark E. Garrett
Garrett Group Consulting, Inc.
4028 Oakdale Farm Circle
Edmond, OK 73013
ra-oca@paoca.org

David Habr
Habr Economics
213 Cornuta Way
Nipoma, CA 93444-5020
david.habr@habreconomics.com



Daniel Clearfield, Esquire

**2023 AAOP OFFICIAL SUBMISSION (REVISED)
M-2023-3043952**

(1) Detailed description of facilities repaired, improved, and replaced in FY 2023:

^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		
6900 Henley, 6900 Wayne, 700 Carpenter	4,726	\$826,513	3,866	913	4,779	\$979,363 \$979,363.07
2600-2900 Poplar St, 900 Taney St, 900 N 26th St	2,395	\$937,305	682	1,555	2,237	\$941,243 \$941,242.71
Unit-100 W Tulpehocken St, Unit W Washington Ln	2,254	\$862,770	949	1,300	2,249	\$999,680 \$999,680.46
1800 Mohican St, 1800 Nolan St, 7300 Thouron Ave, 1800 E Pastorius St, 7300 Rugby St	4,610	\$1,043,861	3,799	690	4,489	\$1,124,964 \$1,124,963.94
700-800 S 51st St, 5000 Baltimore, 5000 Willows Ave	3,078	\$1,037,544	2,613	453	3,066	\$889,503 \$889,503.09
5800-5900 Rising Sun, 500 Van Kirk	2,681	\$1,221,076	1,421	1,276	2,697	\$1,325,264 \$1,325,264.34
1100 - 2200 Fitzwater	5,832	\$5,634,259	449	5,462	5,911	\$4,837,469 \$4,837,468.54
5700 Rising Sun, 300-400 E Cheltenham, 500 Sanger, 5800 Hasbrook	2,873	\$1,250,395	1,811	1,005	2,816	\$1,658,851 \$1,658,851.02
6400 Stenton, 1300 Cardeza, 1300 Cliveden, 1300 Barringer	4,620	\$1,360,927	3,385	1,329	4,714	\$1,284,787 \$1,284,787.33
2100-3500 W. Allegheny Ave	6,734	\$6,323,485	165	6,714	6,879	\$7,080,856 \$7,004,979.85
7800 Walker St, 4200-4300 Hartel Ave, 4200 Lansing	2,010	\$471,702	2,019	0	2,019	\$410,648 \$410,647.65
5900-6000 Castor Ave, 1400 Comly St, 1300 Howell St, 5900 E Roosevelt Blvd, 1300 Van Kirk St	2,815	\$666,864	2,783	0	2,783	\$560,452 \$560,452.15
6100-6200 Baynton, Unit E Tulpehocken, 100 E Mayland	2,559	\$517,854	2,582	0	2,582	\$530,311 \$530,311.03
7300 N 18th St, 1800 Ashley Rd, 7300 N 19th St	2,616	\$491,989	2,877	0	2,877	\$552,686 \$552,686.44

2023 AAOP OFFICIAL SUBMISSION (REVISED)
M-2023-3043952

Project Location	Projected Removal	Projected Cost	Low	All Pressures	Total Footage	Actual Cost
			10" and Smaller	12" and Larger		
5900 Weymouth St, 5900 Reach St, 200-300 Howell, 5900 Crystal, 5800 Newtown St	3,217	\$740,705	3,329	0	3,329	\$748,393 \$748,392.64
2200-2800 Allegheny Ave, 3100 Pennock*	4,427	\$1,502,771	1,357	3,111	4,468	\$1,693,948 \$1,693,948.48
4500-4600 Van Kirk St, 5700-5900 Ditman St, 5800-5900 Torresdale Ave, 4600 Howell St*	2,783	\$674,891	2,787	0	2,787	\$562,637 \$562,636.89
1000-1200 Fillmore, 1000-1200 Harrison*	3,756	\$764,819	3,756	0	3,756	\$836,122 \$836,122.20
100 W. Godfrey Ave, 6200 Palethorp, 6200 Hancock, 6100-6200 Mascher, 6200 Howard, 6200 Hope, 6200 Front*	4,708	\$1,322,412	4,719	0	4,719	\$1,410,410 \$1,410,409.72
Total Cast Iron Main Footage Removed / Total Cost	68,694	\$27,652,142	45,349	23,808	69,157	\$28,427,587 \$27,912,088
Mileage	13.01		8.59	4.51	13.10	

*Projects were not scheduled for FY 2023 replacement at the time of PGW's FY 2022 AAOP submission