



April 4, 2025

Via Electronic Filing

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

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

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the **Prehearing Memorandum of the Tenant Union Representative Network and Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** in the above captioned matters.

This memorandum is being served via email as indicated on the attached Certificate of Service.

Sincerely,

Benjamin Clark, Esq.
Counsel for TURN and CAUSE-PA
Community Legal Services, Inc.

Encl.

Cc: Certificate of Service



BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	R-2025-3053112
Office of Consumer Advocate	:	C-2025-3053827
Office of Small Business Advocate	:	C-2025-3053978
The Philadelphia Industrial and Commercial	:	C-2025-3054216
Gas Users Group	:	
	:	
	:	
v.	:	
	:	
Philadelphia Gas Works	:	

CERTIFICATE OF SERVICE

I hereby certify that I have, on this day, served copies of the **Prehearing Memorandum of the Tenant Union Representative Network and Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

SERVICE BY EMAIL ONLY

Administrative Law Judge Eranda Vero
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
801 Market Street, Suite 4063
Philadelphia, PA 19107
evero@pa.gov

Rebecca Lyttle, Esq.
Steven C. Gray, Esq.
Office of Small Business Advocate
Forum Place, 1st Floor
555 Walnut Street
Harrisburg, PA 17101
relyttle@pa.gov
sgray@pa.gov

Harrison W. Breitman, Esq.
Ryan Morden, Esq.
Katherine Kennedy, Esq.
Keith D. Earls, Paralegal
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101
OCA25PGWBRC@paoca.org
kearls@paoca.org

Carrie B. Wright, Esq.
Michael A. Podskoch, Jr., Esq.
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
carwright@pa.gov
mpodskoch@pa.gov



Charis Mincavage, Esq.
Adeolu A. Bakare, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17101-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com

Devin McDougall, Esq.
Mychal Ozaeta, Esq.
Rebecca Barker, Esq.
Hema Lochan, Esq.
Celine Busnelli
Clean Energy Program
Earthjustice
1617 John F. Kennedy Blvd., Suite 1130
Philadelphia, PA 19103
dmcDougall@earthjustice.org
mozaeta@earthjustice.org
rbarker@earthjustice.org
hlochan@earthjustice.org
cbusnelli@earthjustice.org

Daniel Clearfield, Esq.
Bryce R. Beard, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market St., 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
bbeard@eckertseamans.com

Dennis A. Whitaker, Esq.
Kevin J. McKeon, Esq.
Todd S. Stewart, Esq.
Hawke McKeon & Sniscak LLP
100 N 10th Street
Harrisburg, PA 17101
dawhitaker@hmslegal.com
kjmckeon@hmslegal.com
tsstewart@hmslegal.com

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ben Clark'.

Benjamin Clark, Esq.
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
(215) 227-4794
bclark@clsphila.org

April 4, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2025-3053112
Office of Consumer Advocate	:	C-2025-3053827
Office of Small Business Advocate	:	C-2025-3053978
The Philadelphia Industrial and Commercial	:	C-2025-3054216
Gas Users Group	:	
	:	
	:	
v.	:	
	:	
Philadelphia Gas Works	:	

Prehearing Memorandum of Tenant Union Representative Network and Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania

The Tenant Union Representative Network (“TURN”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) (collectively, “TURN and CAUSE-PA”) through counsel Community Legal Services, Inc., hereby submit this Prehearing Conference Memorandum pursuant to the Prehearing Conference Order of Administrative Law Judge Eranda Vero issued on March 28, 2025. Joline R. Price, Esquire will be the primary speaker for TURN and CAUSE-PA for purposes of the April 7, 2025 Prehearing Conference.

I. History of the Proceeding

On February 27, 2025, Philadelphia Gas Works (“PGW” or “Company”) filed with the PUC its proposed Supplement No. 176 to PGW’s Gas Service Tariff – Pa P.U.C. No. 2 (“Supplement No. 176”) and proposed Supplement No. 119 to PGW’s Supplier Tariff – Pa P.U.C. No. 1 (“Supplement No. 119”), collectively the “2025 Base Rate Case Filing,” which was assigned this Docket No. R-2025-3053112.

In its filing, PGW seeks to increase the distribution base rates charged to PGW’s residential, commercial and industrial customers. PGW proposed to increase its distribution rates

by approximately \$105.0 million per year, or 15.73%, effective April 28, 2025. If PGW's rate request is approved, the average monthly bill of a residential customer using 61 thousand cubic feet (Mcf) per year will increase by \$12.01 from \$92.60 to \$104.61, or by 13.0%. As part of its request, PGW proposes to increase its fixed customer charge for residential customers from \$16.25 per month to \$19.50 per month.

On March 27, 2025, TURN and CAUSE-PA filed a Petition to Intervene in this proceeding. On March 27, 2025, the Pennsylvania Public Utility Commission entered a Suspension and Investigation Order suspending the proposed tariffs by operation of law, and opening an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained therein. On March 28, 2025, Judge Vero issued an Initial Telephonic Prehearing Conference Notice, scheduling a Prehearing Conference to be held on April May 7, 2025, at 10:00 a.m. On March 28, 2025, Judge Vero also issued a Prehearing Conference Order ("Order") requiring parties to file a Prehearing Conference Memorandum on or before 12 p.m. on April 4, 2025. TURN and CAUSE-PA submit this prehearing memorandum pursuant to that Order.

II. Issues

TURN and CAUSE-PA have preliminarily reviewed PGW's rate filing and generally object to any rate increase to the extent that the proposed increase could result in unjust and unreasonable rates and/or impose hardship on economically vulnerable residential customers and consumers. TURN and CAUSE-PA have preliminarily identified the following issues presented by this filing, which affect their members, and which TURN and CAUSE-PA seek to examine more fully:

1. Whether a rate increase will result in unjust and unreasonable costs for Philadelphia's economically vulnerable and low-income residential homeowners and tenants, directly through rates and charges or indirectly through rent obligations, based on all relevant factors;
2. Whether PGW's proposal to increase its residential customer charge to \$19.50 is just and reasonable;
3. Whether PGW's proposal to increase the residential volumetric charge is just and reasonable;
4. Whether PGW's proposal to increase the average residential heating customer bill by 13.0% is just and reasonable;
5. Whether PGW's proposal to introduce a Revenue Normalization Adjustment Mechanism is just and reasonable;
6. Whether PGW's Weather Normalization Adjustment is just, reasonable and appropriate;
7. Whether a rate increase is justified given the quality of PGW's customer service;
8. Whether PGW's universal service program rules, policies and practices have been successful in mitigating the impact of PGW's high rates on low-income customers; and
9. Whether PGW's customer application policies, termination practices, payment agreement requirements, collections policies, or other policies and practices have impeded access to service and/or contributed to reduced revenue or lost opportunities for revenue growth.

TURN and CAUSE-PA reserve the right to raise other relevant issues and respond to other issues that may arise in the course of this proceeding.

III. Witnesses and Testimony

At this time, TURN and CAUSE-PA intend to present the testimony of Mr. Patrick Cicero, Esquire.

Patrick Cicero
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
(717) 236-9486, Ext. 204
pcicero@pautilitylawproject.org

It is anticipated that Mr. Cicero will provide testimony regarding some or all of the issues identified above. Mr. Cicero may also address other issues and provide testimony in response to other parties. TURN and CAUSE-PA reserve the right to present the aforementioned witness to testify in this matter, as well as the right to call additional or substitute witnesses as may be warranted upon proper notice to Your Honor and the parties.

IV. Discovery

TURN and CAUSE-PA will work with the parties to develop appropriate modifications to discovery rules that support the prompt and robust exchange of all relevant information.

V. Settlement

TURN and CAUSE-PA are willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourage the parties to engage in settlement early in the process.

VI. Public Input Hearings

TURN and CAUSE-PA support PGW's proposal for four public input hearings. TURN and CAUSE-PA further request that at least one public input hearing be conducted telephonically and at least one public input hearing be conducted in person.

VII. Schedule for Testimony, Hearings, and Briefs

TURN and CAUSE-PA have engaged in discussions with the other parties regarding a litigation schedule and timing of hearings. As of this filing, the parties have not yet finalized a schedule. However, TURN and CAUSE-PA support the following schedule, as proposed by PGW and OCA and as agreed upon by a majority of the parties:

Public Input Hearings	May 6-7, 2025
Non-Company Direct Testimony	May 21, 2025
Rebuttal Testimony	June 20, 2025
Surrebuttal Testimony	July 2, 2025
Rejoinder Outlines and Witness Cross-Examination Matrix	July 11, 2025
Hearings	July 15-17, 2025
Main Briefs	July 30, 2025
Reply Briefs	August 8, 2025

VIII. Service on TURN and CAUSE-PA

TURN and CAUSE-PA will be represented in this proceeding by Joline R. Price, Esquire, Daniela E. Rakhlina-Powsner, Esquire, Benjamin Clark, Esquire, and Robert W. Ballenger, Esquire, who will accept electronic delivery of documents.

Joline R. Price, Esquire
Daniela E. Rakhlina-Powsner, Esquire
Benjamin Clark, Esquire
Robert W. Ballenger, Esquire
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
Telephone: (215) 981-3700
Facsimile: (267) 765-6481
jprice@clsphila.org
drakhlinapowsner@clsphila.org

bclark@clsphila.org
rballenger@clsphila.org

TURN and CAUSE-PA also request that their witness, Patrick Cicero, be included on all service in this proceeding, by electronic means wherever possible, as follows:

Patrick Cicero
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
717-236-9486, Ext. 204
pcicero@pautilitylawproject.org

IX. Conclusion

TURN and CAUSE-PA respectfully request that this memorandum be entered into the record of this proceeding.

Respectfully submitted,



Joline R. Price, Esquire
Daniela E. Rakhlina-Powsner, Esquire
Benjamin Clark, Esquire
Robert W. Ballenger, Esquire

Counsel for TURN and CAUSE-PA
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
(215) 981-3700

April 4, 2025