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April 4, 2025

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

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

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, appearing to read 'R. Kimmel', written in a cursive style.

Rebecca Kimmel  
MCNEES WALLACE & NURICK LLC

c: Administrative Law Judge Eranda Vero (via e-mail)  
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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Rebecca Kimmel

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

Dated this 4th day of April, 2025, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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

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As requested by Administrative Law Judge ("ALJ") Eranda Vero in the March 28, 2025, Prehearing Conference Order, 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 February 27, 2025, Philadelphia Gas Works ("PGW" or "Company") filed with the Pennsylvania Public Utility Commission ("Commission" or "PUC") Supplement No. 176 to Gas Service Tariff – Pa. P.U.C. No. 2 ("Supplement No. 176"), requesting a general rate increase of approximately \$105 million to become effective on April 28, 2025. In addition, PGW proposed several tariff modifications.

On March 26, 2025, PICGUG filed a Complaint in this proceeding. A description of PICGUG is set forth in Paragraph 6 of PICGUG's Complaint. A Prehearing Conference has been scheduled in this proceeding for April 7, 2025.

## II. COUNSEL

PICGUG is represented in this matter by:

Charis Mincavage (I.D. No. 82039)  
Adeolu A. Bakare (I.D. No. 208541)  
Rebecca Kimmel (I.D. No. 335097)  
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For purposes of the Prehearing Conference, Charis Mincavage will speak as the lead attorney on behalf of PICGUG.

## III. ANTICIPATED ISSUES AND SUB-ISSUES

PICGUG's preliminary review of the Company's filing indicates a need for Commission investigation into at least the following issues:

- (a) Whether the size of the requested rate increase is appropriate;
- (b) Whether the allocation of the proposed rate increase among the customer classes is just, reasonable, and non-discriminatory;
- (c) Whether PGW's claimed cost of service study is accurate, legitimate, and appropriate; and
- (d) Whether PGW's proposed tariff modifications result in unjust and unreasonable rates and service for customers.

PICGUG anticipates pursuing these issues during this proceeding, as necessary, and reserves the right to address additional issues, as well as to respond to issues raised by other parties during the course of this proceeding.

#### **IV. PROPOSED WITNESSES**

PICGUG expects to sponsor testimony regarding the aforementioned issues by the following witness:

Billie S. LaConte  
J. Pollock, Incorporated  
12647 Olive Blvd, Suite 585  
St. Louis, MO 63141  
Phone: (314) 878-5814  
[bsl@jpollockinc.com](mailto:bsl@jpollockinc.com)

PICGUG reserves the right to modify or supplement this witness list during the course of this proceeding. In the event that PICGUG decides to modify or supplement the witness list, it will inform the parties and the ALJ as soon as possible of the intended witnesses. 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 ALJ and the parties at the Prehearing Conference to develop a complete procedural schedule. PICGUG will also cooperate with the ALJ and the parties to develop appropriate discovery rules in accordance with the Commission's regulations and any ALJ 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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Dated: April 4, 2025