



April 4, 2025

Via Electronic Filing

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

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

Dear Secretary Chiavetta,

Please find enclosed the Prehearing Conference Memorandum of the Energy Justice Advocates. As indicated on the attached Certificate of Service, service on the parties was accomplished by email only. Should you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

/s/ Devin McDougall

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(917) 628-7411

Counsel for the Energy Justice Advocates

cc:

The Honorable Eranda Vero
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al.

v.

Philadelphia Gas Works

Docket No. R-2025-3053112
Docket No. C-2025-3053827
Docket No. C-2025-3053978
Docket No. C-2025-3054216

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the following document upon the parties of record to this proceeding, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) in the manner and upon the persons listed below.

Service By Email Only

<p>Harrison W. Breitman, Esq. Ryan Morden, Esq. Katherine Kennedy, Esq. Keith D. Earls, Paralegal Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 OCA25PGWBRC@paoca.org kearls@paoca.org</p> <p><i>Counsel for OCA</i></p>	<p>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</p> <p><i>Counsel for OSBA</i></p>
<p>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</p> <p><i>Counsel for BIE</i></p>	<p>Daniel Clearfield, Esq. Bryce R. Beard, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8th Floor Harrisburg, PA 17101 dclearfield@eckertseamans.com bbeard@eckertseamans.com</p> <p><i>Counsel for PGW</i></p>

<p>Joline R. Price, Esq. Daniela E. Rakhlina-Powsner, Esq. Benjamin Clark, Esq. Robert W. Ballenger, Esq. Community Legal Services, Inc. 1424 Chestnut Street Philadelphia, PA 19102 jprice@clsphila.org drakhlinapowsner@clsphila.org bclark@clsphila.org rballenger@clsphila.org</p> <p><i>Counsel for TURN and CAUSE-PA</i></p>	<p>Charis Mincavage, Esq. McNees Wallace & Nurick, LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108 cmincavage@mcneeslaw.com</p> <p><i>Counsel for the Philadelphia Industrial and Commercial Gas Users Group</i></p>
<p>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</p>	

Dated: April 4, 2025

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**PREHEARING CONFERENCE MEMORANDUM
OF THE ENERGY JUSTICE ADVOCATES**

April 4, 2025

I. Background

On February 27, 2025, Philadelphia Gas Works (“PGW”) filed with the Pennsylvania Public Utility Commission (“Commission”) 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” or “Filing.” The Commission assigned this proceeding (“Proceeding”) Docket No. R-2025-3053112. On April 4, 2025, POWER Interfaith, Sierra Club, Physicians for Social Responsibility Pennsylvania, Clean Air Council, Vote Solar, PennEnvironment, and the Pennsylvania Public Interest Research Group (collectively, the “Energy Justice Advocates”) submitted a Petition to Intervene in this Proceeding.

On March 28, 2025, Administrative Law Judge (“ALJ”) Eranda Vero issued a Prehearing Conference Order setting the date of a prehearing conference in the above-captioned proceeding for 10:00 am on April 7, 2025 and directing parties to file a prehearing conference memorandum by 12:00 pm on April 4, 2025. Pursuant to that order, the Energy Justice Advocates respectfully submit this memorandum.

II. Settlement

The Energy Justice Advocates are ready to engage in settlement discussions with any party to resolve or narrow the issues in this Proceeding.

III. Legal Briefs and the Necessity of Hearings

In the event that PGW, the Energy Justice Advocates, and other parties to this Proceeding are unable to resolve issues through settlement, the Energy Justice Advocates respectfully submit

that the outstanding issues should be adequately analyzed and addressed on the record during hearings and the parties should be provided the opportunity to submit initial briefs and reply briefs.

IV. Procedural Schedule, Amount of Hearing Time, and Other Procedural Matters

The Energy Justice Advocates support the following procedural schedule, as proposed by PGW, OCA, TURN, and CAUSE-PA:

Public Input Hearings (4x)	May 6-7, 2025 (1:00 pm and 6:00 pm each day)
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

The Energy Justice Advocates will also be prepared to discuss with the ALJs and the Parties at the Prehearing Conference other measures as may aid in expediting the orderly conduct of these Proceedings, including, without limitation: arrangements for the submission of direct testimony of witnesses in writing in advance of the hearing to the extent practicable; arrangements for the submission in advance of the hearing of written requests for information which a party contemplates asking another party to present at hearing; the exchange and acceptance of exhibits to be offered into evidence; the obtaining of admissions or stipulations as

to factual matters not in dispute, or the authenticity of documents; limitations on the number of witnesses; and, any issues that may arise concerning discovery or production of data or other material.

V. Presently Identified Issues

The Energy Justice Advocates are continuing to review the Filing and anticipate investigating its basis through discovery in order to formulate their positions in this Proceeding. On initial review, the Energy Justice Advocates are concerned that the Filing may not result in just and reasonable rates for PGW. The Energy Justice Advocates reserve the right to address other issues as they may arise.

VI. Witnesses

The Energy Justice Advocates reserve the right to present expert direct, rebuttal, and surrebuttal testimony.

VII. Public Input Hearings

The Energy Justice Advocates support the convening of four public input hearings, two in-person, and two telephonic, for this Proceeding.

VIII. Discovery

The Energy Justice Advocates are ready to engage in discussions regarding appropriate discovery modifications for this Proceeding to help facilitate the development of the record.

IX. Counsel and Service

The Energy Justice Advocates are represented in this matter by:

Devin McDougall, Esq. (PA Attorney ID No. 329855)
Mychal Ozaeta, Esq. (*Pro Hac Vice motion pending*)
Rebecca Barker, Esq. (*Pro Hac Vice motion pending*)
Hema Lochan, Esq. (*Pro Hac Vice motion pending*)
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The Energy Justice Advocates consent to receive service of documents in this Proceeding by electronic mail as provided in 52 Pa. Code § 1.54(b)(3). Pursuant to 52 Pa. Code § 1.55(b), service on the Energy Justice Advocates may be made on the following individual, who will also serve as lead for the Energy Justice Advocates during the Prehearing Conference:

Devin McDougall, Esq.
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As a courtesy, the Energy Justice Advocates respectfully request that any documents they are served by electronic mail be served upon the following additional individuals at the email addresses indicated:

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Dated: April 4, 2025

Respectfully submitted,

/s/ Devin McDougall

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