



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE  
REFER TO OUR FILE

December 17, 2025

Docket No. M-2025-3058246  
Utility Code: 125042

DANIEL CLEARFIELD  
ECKERT SEAMANS CHERIN & MELLOTT, LLC  
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HARRISBURG, PA 17101  
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**Re: Annual Asset Optimization Plan (AAOP) for the Philadelphia Gas Works (PGW) – Docket No. M-2025-3058246**

Dear Daniel Clearfield:

On October 30, 2025, Philadelphia Gas Works (PGW) filed its Annual Asset Optimization Plan (AAOP), pursuant to 52 Pa. Code § 121.6.

The Commission's regulations require utilities with an approved Distribution System Improvement Charge (DSIC) to file annually an AAOP with the Commission. The AAOP shall be filed 60 days after the prior 12 months of the company's Long-Term Infrastructure Improvement Plan (LTIIIP) has expired, and pursuant to this timeframe for each successive AAOP. 52 Pa. Code § 121.6(a).

The AAOP must include:

- 1) A description that specifies all of the eligible property repaired, improved, and replaced in the prior 12-month period under its LTIIIP and prior year's AAOP.
- 2) A description of the eligible property to be repaired, improved, and replaced in the upcoming 12-month period.

The Commission is charged with reviewing each AAOP only to determine whether the utility is in substantial compliance with the repairs, improvements, or replacements of the specific eligible property in its approved LTIIIP, for the corresponding 12-month timeframes. 52 Pa. Code § 121.6(d). The Commission has delegated the review of AAOPs to the Bureau of Technical Utility Services.

**Timely Filing**

*52 Pa. Code § 121.6(a)*

*A utility with an approved DSIC shall file with the Commission, for informational purposes, an AAO plan. The AAO plan shall be filed annually with the Commission 60 days after the 12 months of its LTIP has expired and under this time frame for each successive year of the term of the LTIP.*

PGW's LTIP is delineated by PGW's fiscal year, rather than by calendar year. PGW's fiscal year spans September 1 of each year to August 31 of the following year and is due by October 30 of each year. PGW filed their AAOP on October 30, 2025, and appears to comply with this requirement.

**Content**

*52 Pa. Code § 121.6(b)*

*An AAO plan must include:*

- (1) A description that specifies all the eligible property repaired, improved and replaced in the prior 12-month period under its LTIP and prior year's AAO plan.*
- (2) A description of the eligible property to be repaired, improved and replaced in the upcoming 12-month period.*

PGW's AAOP substantially complies with this requirement.

**Substantial Adherence to LTIP**

*52 Pa. Code § 121.6(d)*

*An AAO plan will be reviewed by the Commission only to determine whether the utility is in substantial compliance with the repairs, improvements or replacements of the specific eligible property in its approved LTIP for the corresponding 12-month time frames.*

*52 Pa. Code § 121.6(e)*

*Absent any major modifications to the LTIP or Commission action to reject an AAO plan within 60 days of its submission to the Commission, the AAO plan will be deemed approved. The Commission may extend its consideration period if necessary.*

*52 Pa. Code § 121.6(f)*

*If an AAO plan is rejected by the Commission, the utility will be notified of the plan's deficiencies and actions needed to repair, improve or replace eligible property to bring the utility into compliance with the work schedule in its approved LTIP. If the utility concludes that*

*it needs to revise its LTIP to comply with the Commission's determinations, it shall file a petition for modification under § 121.5.*

PGW exceeded its Fiscal Year (FY) 2025 LTIP goal for accelerated pipeline replacement by 1.95 miles, with 15.50 miles of accelerated replacement. This 14.4% increase in accelerated replacement was accompanied by a decrease in spending of \$2.4 million, a shortfall of 6.2% from PGW's LTIP projections. This was in part because some of the larger diameter projects PGW had planned in FY 2025 but were not completed, primarily due to scheduling conflicts.

Additionally, PGW replaced 2.08 miles of additional pipelines using grant money from the Pipeline and Hazardous Materials Safety Administration under the Natural Gas Distribution Infrastructure Safety and Modernization (NGDISM) grant program. PGW expects to replace an additional 6.81 miles of pipelines using NGDISM funds in FY 2026.

Compliance with the LTIP is evaluated on a multiyear basis over the life of the LTIP. Construction and budget variations in individual years can be expected and it is reasonable to expect that over a multi-year timeframe, much of this variation will be mitigated.

The AAOP does not propose a Major Modification to the company's LTIP.

Accordingly, PGW's AAOP appears to substantially conform to the schedule set forth in the company's LTIP.

### **Conclusion**

Upon review of PGW's AAOP filed on October 30, 2025, it appears that the filing substantially complies with the requirements of 52 Pa. Code § 121.6 and it is approved. This approval is contingent upon the possibility that subsequent audits, reviews and inquiries, in any Commission proceeding, may be conducted pursuant to 52 Pa. Code § 121.

If you are dissatisfied with the resolution of this matter, you may, as set forth in 52 Pa. Code § 5.44, file a petition with the Commission within twenty (20) days after the date of this letter. Please direct any questions regarding this filing to Matthew Stewart, Gas Reliability Engineer, Bureau of Technical Utility Services at [mattstewar@pa.gov](mailto:mattstewar@pa.gov).

Sincerely,



Matthew Homsher  
Secretary

cc: Kriss Brown, LAW  
Allison Kaster, BIE  
Robert Horensky, BIE  
Dan Searfoorce, TUS  
John Van Zant, TUS