



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

January 16, 2026

Via Electronic Filing

Matthew L. Homsher, Secretary
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-2023-3037933
I&E Prehearing Memorandum

Dear Secretary Homsher:

Enclosed for electronic filing please find the Prehearing Memorandum of the Bureau of Investigation and Enforcement (I&E) in the above-captioned proceeding.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Carrie B. Wright'.

Carrie B. Wright
Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 208185
(717) 783-6156
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CBW/ac
Enclosures

cc: Administrative Law Judge Eranda Vero (*via email* – evero@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2023-3037933
	:	
Philadelphia Gas Works	:	

**PREHEARING MEMORANDUM OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT**

To Administrative Law Judge Eranda Vero:

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) hereby submits this Prehearing Memorandum in the above-captioned docket. The I&E prosecutor assigned to this proceeding is Deputy Chief Prosecutor Carrie B. Wright. Ms. Wright may be contacted as follows:

By mail: Carrie B. Wright
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

By e-mail: carwright@pa.gov

By telephone: (717) 783-6156

I. BACKGROUND

On February 27, 2023, Philadelphia Gas Works (PGW) filed with the Pennsylvania Public Utility Commission (Commission) Supplement No. 105 to PGW Gas Supplier Tariff Pa. P.U.C. No. 1 and proposed Supplement No. 159 to PGW Gas Service Tariff Pa. P.U.C. No. 2 proposed an increase of PGW's total annual operating revenues for gas service by approximately \$85.8 million.

Evidentiary hearings were held on July 11-12, 2023. The Commission entered an order in this base rate proceeding on November 9, 2023. However, Petitions for Reconsideration of that order were filed. The Commission issued its order related to those Petitions for Reconsideration on January 18, 2024. The case was subsequently appealed to the Pennsylvania Commonwealth Court (Commonwealth Court) and by order dated August 1, 2025, the Commonwealth Court vacated the Commission's January 18, 2024, order and remanded the matter to the Commission for further explanation and clarification.

II. ISSUES

At this time I&E has not determined whether it will present testimony in this proceeding. To the extent I&E presents testimony in this proceeding, it will confine that testimony to the issues identified in the Commonwealth Court's Order

III. WITNESSES

It is currently expected that I&E may call the following witness without being limited thereto:

- Ethan Cline, Fixed Utility Valuation Engineer

The I&E witness may be contacted through the contact information listed above for Ms. Wrigt. I&E reserves the right to substitute witnesses or call additional witnesses if warranted. All active parties will be notified of any amendments to the I&E witness list.

IV. EVIDENCE

I&E expects to present all written testimony and accompanying exhibits at the evidentiary hearing. Moreover, I&E intends to rely on PGW's filing, answers to data requests and interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources and other public documents and reports. However, there may be issues of Commission policy or legal representation that are not properly the subject of testimony or factual issues that are clear on the record and need not be supported by testimony, I&E reserves the right to dispense with testimony when, in its opinion, an issue can be adequately addressed through briefing.

V. DISCOVERY

I&E will work with the Parties and the ALJ to determine the appropriate discovery modifications in this proceeding.

VI. SCHEDULE

I&E supports the schedule presented by PGW.

VII. SERVICE OF DOCUMENTS

For purposes of satisfying in-hand requirements for discovery responses, prepared testimony, and briefs, I&E proposes to both only serve and accept electronic delivery of documents.

VIII. SETTLEMENT

I&E is committed to participating in settlement discussions and is willing to work with the parties to reach a resolution of any or all issues. In the event settlement discussions fail to result in resolution of the matter, I&E is prepared to fully or partially litigate this proceeding as warranted.

Respectfully submitted,

A handwritten signature in cursive script that reads "Carrie B. Wright". The signature is enclosed in a thin black rectangular border.

Carrie B. Wright
Deputy Chief Prosecutor
PA Attorney ID No. 208185

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
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Date: January 16, 2026

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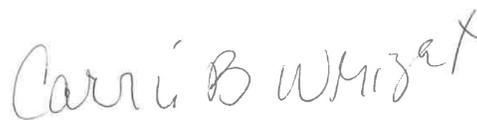
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