



PHILADELPHIA GAS WORKS

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August 28, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56,
Docket No. L-2025-3058767**

Dear Secretary Homsher:

Enclosed for electronic filing please find Philadelphia Gas Works' comments to the Commission's February 19, 2026 Notice of Proposed Rulemaking Order at the above-referenced docket. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

Enclosure
cc: Cert. of Service [w/enc.]

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54 (Service by a party).

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Date: August 28, 2026

/s/ Graciela Christlieb
Graciela Christlieb, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking to Further Amend the Provisions of	:	
52 Pa. Code Chapter 56	:	Docket No. L-2025-3058767
	:	
	:	

**COMMENTS OF PHILADELPHIA GAS WORKS
TO FEBRUARY 19, 2026 NOTICE OF PROPOSED RULEMAKING ORDER**

I. INTRODUCTION

Philadelphia Gas Works (“PGW”) is a municipally owned natural gas utility providing natural gas service to approximately 500,000 customers within the City of Philadelphia. PGW is regulated by the Pennsylvania Public Utility Commission (“PUC” or “Commission”) pursuant to Section 2212 of the Public Utility Code.¹ PGW has been an active participant in many proceedings regarding the Commission’s Chapter 56 regulations² and appreciates the opportunity to provide these comments.

PGW respectfully submits these comments in response to the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) February 19, 2026 Notice of Proposed Rulemaking Order to Further Amend the Provisions of 52 Pa. Code Chapter 56, Docket No. L-2025-3058767 (“NOPR Order”), which seeks to incorporate the provisions of the former Chapter 14 of the Public Utility Code into the Chapter 56 regulations.

¹ 66 Pa. C.S. 2212.

² Chapter 56 of the Commission’s regulations relate to the “Standards and Billing Practices for Residential Utility Service.” *See* 52 Pa. Code 56.1.

II. BACKGROUND

Chapter 14 of the Public Utility Code “relates to protecting responsible customers of public utilities”³ and was enacted in 2004.⁴ Chapter 14 addressed legislative concerns about the financial impact that uncollectible accounts have on timely paying customers. Essentially, it sought to eliminate opportunities for customers capable of paying to avoid paying their utility bills while ensuring that service is available to all customers on equitable terms and conditions.⁵

Chapter 14 was reauthorized and amended in 2014. It expired on December 31, 2024.⁶

On December 12, 2024, the Commission issued a Statement of Policy to clarify that even with the sunset of Chapter 14, its regulations codified at 52 Pa. Code Chapter 56 would remain in effect until amended and that the Commission would continue its obligations under the Code to ensure that utility rates and tariffs are just and reasonable.

III. COMMENTS

As the Commission has highlighted, the provisions of Chapter 14 have been in place and effective for decades:

For over 25 years, the Commission has been following precedent in making consistent, evenhanded, predictable decisions evaluating utilities’ termination procedures and residential consumers’ requests for Commission-ordered payment arrangements regarding arrearages. Although the provisions of the former Chapter 14 of the Code have expired, the Commission has continued to make decisions in alignment with prior decisions pursuant to the Commission’s Statement of Policy, the current Chapter 56 of its regulations, and the persuasive statutory authority in Chapters 13 and 15 of the Code, 66 Pa.C.S. §§ 1301-1330, 1501-1512. See e.g., *Ronald Crawford v. Philadelphia Gas Works*, Docket No. C-2025-3055235 (Order entered November 18, 2025) (issuing a payment arrangement

³ 66 Pa. C.S. 1401.

⁴ On November 30, 2004, the Governor signed into law SB 677 that went into effect on December 14, 2004. The Act amended the Code (Title 66) by adding Chapter 14 (66 Pa.C.S. § 1401-1418), which is also known as the “Responsible Utility Customer Protection Act.” As originally enacted, Chapter 14 was scheduled to expire on December 31, 2014, unless re-enacted.

⁵ 66 Pa. C.S. 1402.

⁶ On October 22, 2014, Governor Corbett signed into law HB 939, or Act 155 of 2014. This law became effective on December 22, 2014. The Act reauthorized and amended Chapter 14. As re-enacted in 2014, Chapter 14 expired December 31, 2024.

pursuant to the Commission's Statement of Policy, which cites former Section 1405(a), previously codified at 66 Pa.C.S. § 1405(a)).⁷

Thus, the protections and clarity of Chapter 14 related regulations are well established for customers, meaning that customers understand the rules and responsibilities associated with them. PGW agrees that the Commission's approach of maintaining Chapter 14 provisions in regulation without instituting potentially destabilizing changes, the Commission continues to serve and maintain the public interest and ensures the continued provision of safe and reliable service at reasonable rates.

For reasons stated above, PGW believes that the Commission's approach best protects ratepayers by ensuring that those capable of paying do so in a timely manner. These provisions have provided a predictable and evenhanded framework for over decades, and their reinstatement in regulation is the most effective way to mitigate unnecessary expenses for the public and the utilities alike.

IV. CONCLUSION

PGW appreciates the opportunity to provide these comments and looks forward to continuing to work with the Commission and its staff on these important issues.

Respectfully submitted,

/s/ Graciela Christlieb

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Date: August 28, 2026

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⁷ Notice of Proposed Rulemaking Order to Further Amend the Provisions of 52 Pa. Code Chapter 56, Docket No. L-2025-3058767 (February 19, 2026), p.9.