October 20, 2026

Via E-File

Secretary Matthew L. Homsher
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016
52 Pa Code § 62.4 — Request for Waivers

Docket No. P-2014-2459362

Dear Secretary Homsher:

Please find the attached **Petitions to Intervene and Answer of the Tenant Union Representative Network (TURN) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in response to PGW's proposed Demand Side Management Portfolio Implementation Plan for Fiscal Years 2028-2031, which was filed with the Commission on September 30, 2026 at Docket P-2014-2459362.

Respectfully Submitted,

John W. Sweet, Esq.
Counsel for CAUSE-PA

Charlotte E. Edelstein, Esq.
Counsel for TURN

CC: Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2028-2031	:	
Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016 52 Pa Code § 62.4 — Request for Waivers	:	Docket No. P-2014-2459362

Certificate of Service

I hereby certify that I have this day served copies of the **Petitions to Intervene and Answer of the Tenant Union Representative Network (TURN) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

Via Email

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October 20, 2026

/s/Charlotte Edelstein

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2028-2031	:	
Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016 52 Pa Code § 62.4 — Request for Waivers	:	Docket No. P-2014-2459362

PETITIONS TO INTERVENE AND ANSWER OF THE TENANT UNION REPRESENTATIVE NETWORK AND THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA

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October 20, 2026

Pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission ("PUC" or "Commission"), 52 Pa. Code §§ 5.71-5.76, the Tenant Union Representative Network ("TURN") through their counsel at Community Legal Services, and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), through their counsel at the Pennsylvania Utility Law Project, hereby file formal Petitions to Intervene and Answer to PGW's proposed Demand Side Management Portfolio Implementation Plan for Fiscal Years 2028-2031.

In support thereof, TURN and CAUSE-PA state as follows:

1. On September 30, 2026, Philadelphia Gas Works (PGW) filed a voluntary, ratepayer-supported Demand-Side Management Program (DSM) Implementation Plan for fiscal years 2028-2031 (hereinafter, "Proposed DSM Plan"). PGW filed this Proposed DSM Plan at Docket No. P-2014-2459362. PGW's prior DSM Plans for 2025-2027, 2024-2026, 2021-2023, and 2016-2020 were also reviewed and approved at this docket.

STANDARD FOR INTERVENTION

2. Eligibility to intervene in Commission proceedings is governed by 52 Pa. Code § 5.72, which provides in relevant part that "[a] petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought." 52 Pa. Code § 5.72(a).

3. The Commission's Regulations further provide that the right or interest may be one "which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72(a)(2).

4. Although Section 5.72 speaks of the rights of a "person" to intervene, the Commission has previously determined that a not-for-profit organization may have standing in a representational capacity, including both associations and not-for-profit corporations. See PPL Electric Utilities Corporation's Universal Service and Energy Conservation Plan for 2011-2013, Docket No. M-2010-2179796, Opinion and Order dated May 5, 2011 at 11. In addition, the Pennsylvania Commonwealth Court has consistently stated that "an association may have standing as a representative of its members … as long as an organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action, [i.e., is aggrieved, the organization] has standing." Energy Cons. Council of Pa. v. Pa. PUC, 995 A.2d 465, 476 (Pa. Commw. 2010) (alteration in original) (citing Tripps Park v. Pa. PUC, 415 A.2d 967 (Pa. Commw. 1980); also citing Parents United for Better Schools v. School District of Philadelphia, 646 A.2d 689 (Pa. Commw. 1994)).

INTERVENTION OF TURN

5. TURN was an active party in the above captioned docket with regard to the review and approval of PGW's prior DSM Plans for 2016-2020, 2021-2023, and 2024-2026.

6. TURN is a not-for-profit advocacy organization composed of low and moderate income tenants, with the goal of equal access to safe, decent, accessible, and affordable housing.

7. TURN is located at 100 South Broad Street, Suite 800, Philadelphia, PA 19110.

8. Members of TURN are located within PGW's service territory and will be directly affected by the outcome of this proceeding. Particularly, TURN has a significant interest in the impact PGW's Proposed DSM Plan will have on the rates TURN members pay for service and

their ability to access comprehensive energy efficiency programming. TURN asserts that other participants in this proceeding do not adequately represent these interests.[1]

9. TURN has standing to intervene because their members have or will suffer a direct, immediate, and substantial injury to an interest as a result of this proceeding. See Energy Cons. Council of Pa., 995 A.2d at 476.

10. TURN is represented in this proceeding by:

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Joline R. Price, Esq.
Robert W. Ballenger, Esq.

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11. Counsel for TURN consent to the service of documents by electronic mail, as provided in 52 Pa. Code § 1.54(b)(3).

INTERVENTION OF CAUSE-PA

12. CAUSE-PA was an active party in the above captioned docket with regard to the review and approval of PGW's prior DSM Plans for 2016-2020, 2021-2023, and 2024-2026.

13. CAUSE-PA is an unincorporated association of low and moderate income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating, and telecommunication services.

[1] Though the organizations TURN and CAUSE-PA have some shared goals, TURN is focused specifically on the needs of Philadelphia tenants, while CAUSE-PA's membership includes homeowners.

14. CAUSE-PA membership is open to low and moderate income individuals residing in the Commonwealth of Pennsylvania who are committed to the goal of helping low income families maintain affordable access to utility services and achieve economic independence.

15. CAUSE-PA is located, c/o the Pennsylvania Legal Aid Network, at 118 Locust Street, Harrisburg, PA 17101.

16. Members of CAUSE-PA are located within PGW's service territory and will be directly affected by the outcome of this proceeding. Particularly, CAUSE-PA has a significant interest in the impact PGW's Proposed DSM Plan will have on the rates CAUSE-PA members pay for service and their ability to access comprehensive energy efficiency programming. CAUSE-PA asserts that other participants in this proceeding do not adequately represent these interests.[2]

17. CAUSE-PA has standing to intervene because its members have or will suffer a direct, immediate, and substantial injury to an interest as a result of this proceeding. See Energy Cons. Council of Pa., 995 A.2d at 476.

18. CAUSE-PA is represented in this proceeding by:

John W. Sweet, Esq.
Levi A. Phillips, Esq.
Ria M. Pereira, Esq.
Lauren N. Berman, Esq.
Elizabeth R. Marx, Esq.

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[2] Though the organizations TURN and CAUSE-PA have some shared goals, CAUSE-PA's membership includes homeowners, while TURN is focused specifically on the needs of Philadelphia tenants.

19. Counsel for CAUSE-PA consent to the service of documents by electronic mail, as provided in 52 Pa. Code § 1.54(b)(3).

JOINT ANSWER OF TURN AND CAUSE-PA

20. TURN and CAUSE-PA have preliminarily reviewed PGW's Proposed DSM Plan and have identified a number of concerns that warrant further investigation prior to approval.

21. TURN and CAUSE-PA are concerned that PGW's Proposed DSM Plan does not adequately remedy the obstacles preventing greater low-income customer participation in the Residential Equipment Rebates (RER) program. From fiscal years 2022 to 2025, outside of a single multifamily affordable housing preservation project, only 12 low-income customers accessed PGW's RER rebates.[3] This low-income participation in RER is negligible compared to PGW's issuance of 2,438 non-low-income rebates in that same period.[4] With proposed caps on the RER rebate amounts for fiscal years 2028-2031, a household must still pay the remainder of the upfront cost of hiring a contractor and financing a project to receive a RER rebate.[5] TURN and CAUSE-PA are concerned the lack of no-cost and no-upfront-cost rebates will continue to make PGW's RER rebates prohibitive to most low-income households.

22. Additionally, while TURN and CAUSE-PA are encouraged that the new Home Support program will provide direct install measures, its budget is limited to $500,000 over three years and restricted to households between 150 and 200 percent of the Federal Poverty Level.[6] The Home Support program does not ensure timely or complete energy saving services will be

[3] See PGW DSM Program Annual Report for Fiscal Year 2022, PUC Docket No. P-2014-2459362 (filed Dec. 29, 2022) at 7; PGW DSM Program Annual Report for Fiscal Year 2023, PUC Docket No. P-2014-2459362 (filed Dec. 28, 2023) at 7; PGW DSM Program Annual Report for Fiscal Year 2024, PUC Docket No. P 2014-2459362 (filed Dec. 30, 2024) at 7; PGW DSM Program Annual Report for Fiscal Year 2025, PUC Docket No. P-2014-2459362 (filed Dec. 31, 2025) at 7.
[4] Id.
[5] Proposed DSM Plan at 21.
[6] Proposed DSM Plan at 33-34.

available to many of TURN and CAUSE-PA's low-income members who rely on PGW service. TURN and CAUSE-PA assert that further investigation of PGW's Proposed DSM Plan is necessary to ensure equitable access to and delivery of energy savings benefits to PGW's low-income consumers.

23. TURN and CAUSE-PA are further concerned that PGW's RER program is overly focused on gas equipment, without adequate inclusion of building envelope measures that can help to remediate air flow issues that undermine savings gained through efficient equipment alone. A more balanced suite of energy efficiency and weatherization measures could more effectively reduce energy consumption and ultimately make gas bills more affordable for TURN and CAUSE-PA's members who rely on PGW service. While PGW proposes to increase insulation and air-sealing incentives, and estimates completing 160 such measures per year, PGW also projects that it will replace 798 gas furnaces, boilers, and water heaters each year.[7] Equipment measures would thus still constitute approximately 83 percent of projected RER measures, while envelope work would constitute only 17 percent. Further review of PGW's Proposed DSM Plan is necessary to determine whether the program offers an appropriate mix of efficiency services to maximize long-term energy savings.

24. PGW's Proposed DSM Plan also lacks critical specificity regarding its planned coordination with other home repair and weatherization agencies working in low-income customers' homes that could benefit from the rebates. PGW's collaboration through its Proposed DSM Plan portfolio is mostly restricted to marketing and outreach partnerships, rather than working to assemble a complete project around a household.[8] TURN and CAUSE-PA assert that further review of PGW's Proposed DSM Plan is necessary to ensure PGW's energy efficiency

[7] Proposed DSM Plan at 22-23.
[8] See Proposed DSM Plan at 12-13

programming is well coordinated to effectively leverage ratepayer investments and maximize the number of low and moderate income households reached by its programs.

25. Based on the information included in PGW's Proposed DSM Plan, it remains unclear whether PGW has proposed equitable and proportionate demand reduction measures for its low income customers, provided appropriately comprehensive services across all sectors, and effectively coordinated programming to ensure that PGW customers can access comprehensive efficiency programs through PGW's Proposed DSM Plan. Further analysis is needed to assess PGW's newly proposed program budgets and expenditures to ensure that such expenditures are just and reasonable and support continuation of PGW's DSM programs.

26. TURN and CAUSE-PA assert that these matters, and any future modifications presented by intervening parties, must be reviewed and investigated to ensure that all customers are able to access safe, affordable natural gas service within the PGW service territory.

WHEREFORE, TURN and CAUSE-PA respectfully request that the Pennsylvania Public Utility Commission grant this Petition to Intervene and Answer, providing TURN and CAUSE-PA full-party status in this proceeding.

Respectfully submitted,

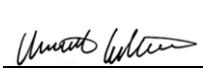
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Date: October 20, 2026

Verification

I, **Joline Price**, legal counsel for Tenant Union Representative Network ("TURN"), hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information, and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904.



Joline R. Price, Esq.
On behalf of TURN

Date: October 20, 2026

Verification

I, **Elizabeth R. Marx**, legal counsel for the Coalition for Affordable Utility Services and Energy Efficiency ("CAUSE-PA"), on behalf of CAUSE-PA, hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information, and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904.



Elizabeth R. Marx
On behalf of the Coalition for Affordable Utility Services and Energy Efficiency ("CAUSE-PA")

Date: October 20, 2026