



August 26, 2020

Via Electronic Filing

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

Re: *Pennsylvania Public Utility Commission v. Philadelphia Gas Works*  
*2020 Base Rate Case Filing* / Docket No. R-2020-3017206

Dear Secretary Chiavetta,

Pursuant to the Briefing Order in the above-captioned proceeding, this letter is to indicate that the Clean Air Council and Sierra Club, Pennsylvania Chapter (the “Environmental Stakeholders”) oppose the petition for partial settlement filed with the Pennsylvania Public Utility Commission (the “Commission”) today for the reasons explained in the Main Brief of the Environmental Stakeholders filed with the Commission today.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being served with a copy of this document. Should you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

/s/ Devin McDougall

Staff Attorney

Earthjustice

1617 John F. Kennedy Blvd., Suite 1130

Philadelphia, PA 19103

[dmcdougall@earthjustice.org](mailto:dmcdougall@earthjustice.org)

(917) 628-7411

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of this electronically-filed document upon the parties, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Hon. Darlene Heep Pennsylvania Public Utility Commission Commonwealth Keystone Buildings 400 North Street Harrisburg, PA 17120 <a href="mailto:dheep@pa.gov">dheep@pa.gov</a>	Hon. Marta Guhl Pennsylvania Public Utility Commission Commonwealth Keystone Buildings 400 North Street Harrisburg, PA 17120 <a href="mailto:mguhl@pa.gov">mguhl@pa.gov</a>
Pam McNeal Pennsylvania Public Utility Commission Commonwealth Keystone Buildings 400 North Street Harrisburg, PA 17120 <a href="mailto:pmcneal@pa.gov">pmcneal@pa.gov</a>	Joseph Otis Minott, Esq. Logan Welde, Esq. Clean Air Council 135 S 19th Street Suite 300 Philadelphia, PA 19103 <a href="mailto:joe_minott@cleanair.org">joe_minott@cleanair.org</a> <a href="mailto:lwelde@cleanair.org">lwelde@cleanair.org</a>
Carrie B. Wright, Esq. Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street P.O. Box 3265 Harrisburg, PA 17105-3265 <a href="mailto:carwright@pa.gov">carwright@pa.gov</a>	Gregory J. Stunder, Esq. Graciela Christlieb Philadelphia Gas Works 800 West Montgomery Avenue Philadelphia, PA 19122 <a href="mailto:Gregory.Stunder@pgworks.com">Gregory.Stunder@pgworks.com</a> <a href="mailto:Graciela.Christlieb@pgworks.com">Graciela.Christlieb@pgworks.com</a>
Daniel G. Asmus, Esq. Sharon E. Webb, Esq. Office of Small Business Advocate Forum Place, 1st Floor 555 Walnut Street Harrisburg, PA 17101 <a href="mailto:dasmus@pa.gov">dasmus@pa.gov</a> <a href="mailto:swebb@pa.gov">swebb@pa.gov</a>	John W. Sweet, Esq. Elizabeth R. Marx, Esq. Ria M. Pereira, Esq. Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 <a href="mailto:pulp@palegalaid.net">pulp@palegalaid.net</a>
Robert D. Knecht Industrial Economics Incorporated 2067 Massachusetts Ave. Cambridge, MA 02140 <a href="mailto:rdk@indecon.com">rdk@indecon.com</a>	Todd S. Stewart, Esq. Hawke McKeon & Sniscak LLP 100 North Tenth Street Harrisburg, PA 17101 <a href="mailto:tsstewart@hmslegal.com">tsstewart@hmslegal.com</a>

<p>Darryl A. Lawrence, Esq. Christy M. Appleby, Esq. Santo G. Spataro, Esq. Laura Antinucci, Esq. Office of Consumer Advocate 5th Floor, Forum Place 555 Walnut Street Harrisburg, PA 17101-1923 <a href="mailto:OCAPGW2020@paoca.org">OCAPGW2020@paoca.org</a> <a href="mailto:cappleby@paoca.org">cappleby@paoca.org</a></p>	<p>Charis Mincavage, Esq. Adeolu A. Bakare, Esq. Jo-Anne Thompson, Esq. McNees Wallace &amp; Nurick LLC 100 Pine Street P.O. Box 1166 <a href="mailto:cmincavage@mcneeslaw.com">cmincavage@mcneeslaw.com</a> <a href="mailto:abakare@mcneeslaw.com">abakare@mcneeslaw.com</a> <a href="mailto:jthompson@mcneeslaw.com">jthompson@mcneeslaw.com</a></p>
<p>Josie B.H. Pickens, Esq. Joline Price, Esq. Robert W. Ballenger, Esq. Kintéshia Scott, Esq. Community Legal Services 1424 Chestnut Street Philadelphia, PA 19102 <a href="mailto:jpickens@clsphila.org">jpickens@clsphila.org</a> <a href="mailto:jprice@clsphila.org">jprice@clsphila.org</a> <a href="mailto:rballenger@clsphila.org">rballenger@clsphila.org</a> <a href="mailto:kscott@clsphila.org">kscott@clsphila.org</a></p>	<p>Lauren M. Burge, Esq. Eckert Seamans Cherin &amp; Mellott, LLC 600 Grant Street, 44<sup>th</sup> Floor Pittsburgh, PA 15219 412-56602146 <a href="mailto:lburge@eckertseamans.com">lburge@eckertseamans.com</a></p>
<p>Daniel Clearfield, Esq. Sarah C Stoner, Esq. Kristine Marsilio, Esq. Eckert Seamans Cherin &amp; Mellott, LLC 213 Market Street 8th Floor Harrisburg, PA 17101 <a href="mailto:dclearfield@eckertseamans.com">dclearfield@eckertseamans.com</a> <a href="mailto:sstoner@eckertseamans.com">sstoner@eckertseamans.com</a> <a href="mailto:kmarsilio@eckertseamans.com">kmarsilio@eckertseamans.com</a></p>	

Dated: August 26, 2020

/s/ Devin McDougall  
Devin McDougall  
Staff Attorney  
Earthjustice  
1617 John F. Kennedy Blvd., Suite 1130  
Philadelphia, PA 19103  
[dmcdougall@earthjustice.org](mailto:dmcdougall@earthjustice.org)