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September 9, 2020

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

**RE: Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2021-2023; 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 Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") in the above-referenced proceeding.

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this filing upon request.

Sincerely,

McNEES WALLACE & NURICK LLC

By 

Jo-Anne Thompson

Counsel to the Philadelphia Industrial and Commercial Gas Users Group

c: Administrative Law Judge F. Joseph Brady (via e-mail)  
Certificate of Service

[www.McNeesLaw.com](http://www.McNeesLaw.com)

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## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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Jo-Anne S. Thompson

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

Dated this 9<sup>th</sup> day of September, 2020, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for :  
Approval of Demand-Side Management :  
Plan for FY 2021-2023 :  
and : Docket No. P-2014-2459362  
Philadelphia Gas Works Universal :  
Service and Energy Conservation Plan :  
for 2014-2016, 52 Pa. Code § 62.4 - :  
Request for Waivers :

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**PETITION TO INTERVENE OF THE PHILADELPHIA  
INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

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TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to the provisions of 52 Pa. Code §§ 5.71-5.74, the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, PICGUG states as follows:

1. Petitioner is the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG"). The composition of PICGUG is attached hereto as Appendix A. PICGUG reserves the right to modify Appendix A throughout the course of this proceeding, as necessary.

2. The name and address of Petitioner's attorneys are:

Charis Mincavage (Pa. I.D. 82039)  
Adeolu A. Bakare (Pa. I.D. 208541)  
Jo-Anne Thompson (Pa. I.D. 325956)  
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3. On May 7, 2020, Philadelphia Gas Works ("PGW" or "Company") filed its Implementation Plan, which details the program budgets and implementation of PGW's EnergySense Demand-Side Management Portfolio from September 1, 2020 to August 31, 2023. ("2020 DSM Plan"), with the Pennsylvania Public Utility Commission ("PUC" or "Commission"). Within the 2021-2023 Implementation Plan, PGW proposes to continue four of the five existing DSM programs.

4. PICGUG is an *ad hoc* group of large volume natural gas customers receiving service from PGW under various rate schedules. PICGUG members use substantial volumes of natural gas in their businesses, and natural gas costs comprise a significant element of their respective costs of operation. PGW's 2020 DSM Plan may affect the Company's provision of natural gas service, including the rates, terms, and conditions under which PICGUG members receive such service. As a result, any PUC determination or collaborative process regarding PGW's DSM Plan may impact PICGUG member interests.

5. Therefore, consistent with 52 Pa. Code § 5.72(a), PICGUG has a significant interest in this proceeding that is not represented by any other party of record. *See* 52 Pa. Code § 5.72(a). Accordingly, the Commission should grant PICGUG intervenor status in this proceeding.

**WHEREFORE**, the Philadelphia Industrial and Commercial Gas Users Group respectfully requests that the Commission grant this Petition to Intervene and provide PICGUG with full party status.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

Dated: September 9, 2020



**APPENDIX "A"**

**PHILADELPHIA INDUSTRIAL AND COMMERCIAL GAS USERS GROUP**

Einstein Healthcare Network

Newman & Company

Philadelphia College of  
Osteopathic Medicine

Temple University

Thomas Jefferson University