



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

August 15, 2023

Via Electronic Filing

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

Re: Petition of Philadelphia Gas Works for Approval of Demand-Side
Management Plan for FY 2024-2026;
Philadelphia Gas Works Universal Service and Energy Conservation Plan for
2014-2016, 52 Pa. Code § 62.4 – Request for Waiver
Docket No. P-2014-2459362
I&E Prehearing Memorandum

Dear Secretary Chiavetta:

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 of record per the attached Certificate of Service. Should you have any questions, please contact the undersigned.

Sincerely,

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

Carrie B. Wright
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 208185
(717) 783-6156
carwright@pa.gov

CBW/ac
Enclosures

cc: Administrative Law Judge F. Joseph Brady (*via email*)
Per Certificate of Service (*via email*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for	:	
Approval of Demand-Side Management	:	
Plan for FY 2024-2026	:	
	:	Docket No.: P-2014-2459362
Philadelphia Gas Works Universal	:	
Service and Energy Conservation Plan	:	
for 2014-2016, 52 Pa. Code § 62.4 –	:	
Request for Waiver	:	

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

TO ADMINISTRATIVE LAW JUDGE F. JOSEPH BRADY:

In accordance with the Prehearing Conference Order dated August 3, 2023, the Bureau of Investigation and Enforcement (“I&E”) hereby submits this Prehearing Memorandum. The I&E prosecutor assigned to this proceeding is Carrie B. Wright. Ms. Wright may be contacted as follows:

By Mail: Carrie B. Wright
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I. BACKGROUND

On July 16, 2023, Philadelphia Gas Works (“PGW”) filed a Petition with the Pennsylvania Public Utility Commission (“Commission”) for approval of a Demand-Side Management Plan for FY 2016-2020, and Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016, 52 Pa. Code § 62.4 – Request for Waivers.

PGW’s Petition was assigned to the Office of Administrative Law Judge (“OALJ”) for establishment of an evidentiary record culminating in a Recommended Decision for the Commission’s consideration.

A telephonic Prehearing Conference is now scheduled for August 16, 2023, at 10:00 a.m., before Administrative Law Judge F. Joseph Brady (the “ALJ”). In accordance with the Prehearing Conference Order issued by the ALJ on August 3, 2023, I&E now respectfully submits this prehearing memorandum.

II. ISSUES

Currently, I&E is monitoring this proceeding to determine if it will pursue any issues.

I&E notes that this prehearing memo is provided without analysis of the positions of all parties to this proceeding and while the discovery process is still underway. Accordingly, I&E necessarily reserves the right to supplement its issue list as necessary to facilitate the development of a full record in this case. Additionally, most of the issues, if any, raised by I&E will be supported by the Direct Testimony of I&E witnesses. If there are issues of Commission policy or legal interpretation 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 in Brief.

III. WITNESSES

I&E does not currently have a witness assigned to this proceeding. If it is determined that I&E will assign a witness, I&E will notify the Parties.

IV. SCHEDULE

I&E will work with the Parties to develop a schedule in this case.

V. DISCOVERY

I&E will work with the Parties to develop any necessary discovery modifications.

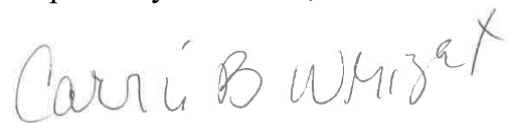
VI. SERVICE OF DOCUMENTS

For purposes of satisfying in-hand service requirements for discovery responses, prepared testimony, briefs and other documents; while operational restraints continue during this proceeding, I&E requests that electronic delivery of documents continue to satisfy the service requirements.

VII. SETTLEMENT

I&E intends to participate in any settlement discussions and is willing to work with the parties in an attempt to reach a resolution of any or all issues.

Respectfully submitted,



Carrie B. Wright
Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
PA Attorney ID No. 308185

Dated: August 15, 2023

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2024-2026	:	
	:	
	:	
	:	Docket No.: P-2014-2459362
Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016, 52 Pa. Code § 62.4 – Request for Waiver	:	
	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated August 15, 2023 in the manner and upon the persons listed below.

Service via Electronic Mail Only

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