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February 23, 2010

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket Nos. P-2009-2137639 and R-2009-2139884

Dear Secretary McNulty:

Enclosed for filing please find an original and (3) copies of a PreHearing Memorandum with regard to the above captioned matter by Philip L. Hinerman, Esquire and Jill Guldin, Esquire on behalf of the Philadelphia Housing Authority.

Copies have been served on all known parties as indicated on the enclosed Certificate of Service.

Very truly yours,

Philip L. Hinerman

PLH/mn
Enclosures
cc: Attached counsel list

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION :
v. : Docket No. R-2009-2139884
: P-2009-2097639
PHILADELPHIA GAS WORKS :

**PHILADELPHIA HOUSING AUTHORITY'S PREHEARING MEMORANDUM TO
ADMINISTRATIVE LAW JUDGE CHARLES E. RAINEY, JR.**


PHILIP L. HINERMAN, ESQUIRE, I.D. #5496
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**PHILADELPHIA HOUSING AUTHORITY'S PREHEARING MEMORANDUM TO
ADMINISTRATIVE LAW JUDGE CHARLES E. RAINEY, JR.**

Philadelphia Housing Authority ("PHA") seeks a fair assessment as to what billing rates will be used for PHA and its residents. Under 52 Pa. Code § 53.52, PHA requests Commission approval to deny Philadelphia Gas Works' ("PGW") unsubstantiated rate changes and class determination. PHA's testimony will present, as described below, PGW's proposed tariff structure is unjust, unreasonable and discriminatory.

1. DISCOVERY

PHA has served discovery and has not yet received any responses, therefore, it proposes that for purposes of this proceeding, no deviation from the Commission discovery regulations be made.

2. ADMISSIONS OR STIPULATIONS

PHA has served its First Set of Interrogatories and has not yet received any responses, therefore, it proposes that for purposes of this proceeding, no deviation from the Commission interrogatory regulations be made.

2. ISSUES TO BE ADDRESSED IN THE CASE

PHA intends to address the proposed rate modification on the basis of rate classification. Although PHA essentially functions as a municipal entity, however, its PGW Delivery Charge rate is higher than that of the current and the proposed Municipal Services ("MS Rate") rate. There has been no substantial determining factor that designates PHA as having its own rate classification, however, PGW charges PHA at a different and higher rate.

3. WITNESSES TO BE PRESENTED BY APPLICANTS

None at this time. PHA's witnesses are subject to responses to its interrogatories

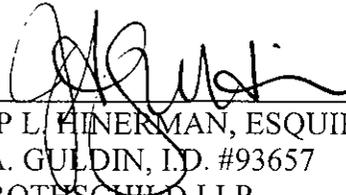
4. **PROPOSED SCHEDULE**

PHA proposes the following schedule:

Willing to work with parties	Second prehearing conference
April 16	Direct Testimony
May 18	Rebuttal
June 1	Surrebuttal
June 15-18	Hearings (Philadelphia)
July 9	Main Brief
July 26	Reply Brief

Respectfully submitted,

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SECRETARY'S BUREAU



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*Attorneys for
Philadelphia Housing Authority*

Dated: February 23, 2010

CERTIFICATE OF SERVICE

I hereby certify that on this date, a true and correct copy of the foregoing Interrogatories of the Philadelphia Housing Authority, dated February 23, 2010, has been served by first class mail, postage prepaid, upon the following:

VIA HAND DELIVERY &/OR FIRST CLASS MAIL

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Dated: February 23, 2010

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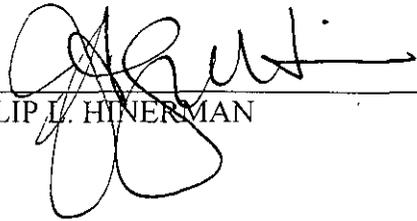
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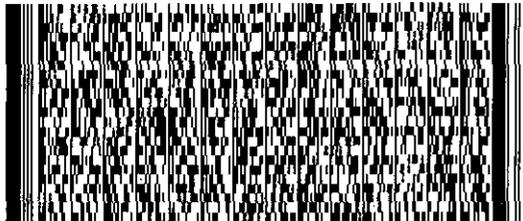
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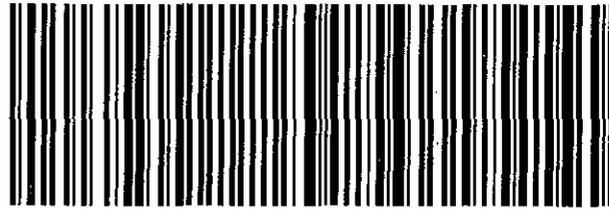
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