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March 2, 2010

Via Hand Delivery

James McNulty, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: PA Public Utility Commission v. Philadelphia Gas Works
Docket Nos. R-2009-2139884 and P-2009-2097639

Dear Secretary McNulty:

On behalf of Philadelphia Gas Works ("PGW") enclosed for filing please find an original and three copies of its Objections to the Office of Consumer Advocate's Interrogatories, Set VII, No. 6 with regard to the above-referenced matter. Copies have been served in accordance with the attached Certificate of Service.

Very truly yours,



Carl Shultz

CS/lww

Enclosure

cc: Cert. of Service w/enc.

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	Docket No. R-2009-2139884
	:	
v.	:	
	:	
Philadelphia Gas Works	:	
	:	
Philadelphia Gas Works' Revised Petition for Approval of Energy Conservation and Demand Side Management Plan	:	Docket No. P-2009-2097639

**PHILADELPHIA GAS WORKS' OBJECTION TO
THE OFFICE OF CONSUMER ADVOCATE'S
INTERROGATORY NO. VII-6**

Philadelphia Gas Works ("PGW") hereby objects to the Office of Consumer Advocate's ("OCA"), Interrogatory Set VII, No. 6. (PGW has previously communicated its intention to object to this Interrogatory).

OCA VII-6:

OCA VII-6 states as follows:

Please provide data on all capacity additions and reductions during the past 25 years and show the net deliverability volumes and cost impacts of the capacity changes by year.¹

OBJECTION:

PGW objects to OCA VII-6 on the following grounds:

¹ OCA has indicated a willingness to accept data in 5-year intervals, such as data for 25 years ago, 20 years ago, etc.

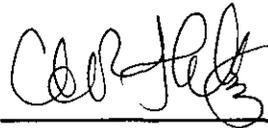
(a) OCA VII-6 seeks information which is neither relevant to any issue in this proceeding (or is likely to arise in the proceeding) and is not reasonably calculated to lead to the discovery of admissible information. The requested data is not related to PGW's test year in the rate proceeding. Nor does the requested data bear any relation to the avoided cost associated with PGW's DSM plan.

(b) This interrogatory would require PGW to conduct a burdensome and expensive special study.

(c) OCA VII-6 is overbroad because it calls for data for an unreasonable long period of time (25 years).

Notwithstanding the foregoing, it should be noted that, PGW is currently working cooperatively with OCA to discuss an alternative response to OCA-VII-6.

Respectfully submitted,



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Of Counsel:

Gregory Stunder, Esq.
Philadelphia Gas Works
800 West Montgomery Ave.
Philadelphia, PA 19122

Dated: March 2, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of PGW's Objection to Office of Consumer Advocate's Interrogatory, Set VII, No. 6 upon the participants listed below in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA E-MAIL &/OR FIRST CLASS MAIL

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Dated: March 2, 2010