

Philadelphia Gas Works

Gregory J. Stunder
Senior Attorney



800 W. Montgomery Avenue, Philadelphia, PA 19122
Telephone: (215) 684-6878 – Fax (215) 684-6798
Email: greg.stunder@pgworks.com

January 28, 2011

VIA EXPRESS MAIL

Rosemary Chiavetta - Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RECEIVED

JAN 28 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: **Philadelphia Gas Works' Comments to the June 17, 2010 Final Rulemaking Order; Docket No. L-2008-2069115**

Dear Secretary Chiavetta:

Enclosed for filing are an original and three (3) copies of Philadelphia Gas Works' revised tariff pages required by paragraph 9 of the above-referenced Order. Pursuant to this Order, the revised tariff pages are to be filed within 30 days after the publication of the regulation amendment in the Pennsylvania Bulletin. The Pennsylvania Bulletin publication date is January 1, 2011.

If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gregory J. Stunder". The signature is fluid and cursive, with the first name being the most prominent. Below the signature, the name "Gregory J. Stunder" is printed in a standard font.

Gregory J. Stunder

Enclosure

PHILADELPHIA GAS WORKS

GAS SUPPLIER TARIFF

RECEIVED

JAN 28 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



Issued by: Thomas Knudsen
President and CEO
PHILADELPHIA GAS WORKS
800 West Montgomery Avenue
Philadelphia, PA 19122

List of Changes Made by this Tariff

DEFINITIONS (PAGE No. 10)

Add definition of “Applicable Law”.

11. FINANCIAL SECURITY (Page No. 44)

Revise section in order to comport with Final Rulemaking Order issued in Docket No. L-2008-2069115.

Definitions

For the purposes of this Supplier Tariff, in addition to any definitions set forth in Company's Gas Service Tariff (except as set forth below) the following definitions apply:

APPLICABLE LAW - The provisions of this Tariff, the rules and regulations promulgated by the PUC and published at Title 52 Pennsylvania Code, the Public Utility Code and all legally binding decisions of the Public Utility Commission interpreting those rules, regulations and law, and all other applicable current and future laws, ordinances, executive orders and legally binding interpretations, all of them as amended from time to time.

BALANCING - Services provided by Company to cover differences between a Supplier's Daily Delivery Requirement and the actual usage of the Supplier's Firm Pool.

CUSTOMER - A recipient of Firm Transportation Service from the Company, except for customers receiving service under Rate GTS-Firm.

DAILY CONTRACT QUANTITY ("DCQ") - The firm transportation capacity ("Pipeline FT Capacity") in Dths assigned by the Company to the Supplier and required to deliver Natural Gas Supply to Supplier's Firm Transportation Customers.

DAILY DELIVERY QUANTITY ("DDQ") - The daily quantities of natural gas supplies a Supplier is required to deliver in Dths for a Firm Pool, as forecasted and communicated by Company, and may specify the required points of delivery. Such forecast shall be calculated to include volumes needed for end-use requirements, prior imbalances and provide return of balancing service quantities and unaccounted for gas, which amount shall not exceed the DDQ. This quantity will include corrections for Volume Adjustments.

DAILY OPERATIONAL BULLETIN ("DOB") - A bulletin issued by the Company to address system management issues on a non-critical day, including actions necessary to comply with statutory directives and obligations.

DELIVERY POINT - A point specified by Company where Supplier would deliver natural gas supplies for subsequent redelivery by Company to Supplier's Firm Transportation customers.

DESIGN DAY – A 24-hour period of usage which is used as a basis for planning gas capacity requirements.

FIRM POOLING SERVICE - Services provided by Company to Supplier to facilitate the delivery of gas supplies to Customers receiving service under Firm Transportation Rates.

FIRM TRANSPORTATION – Transportation Service offered to Customers under schedules or contracts that anticipate no interruptions, regardless of class of service, except for force majeure.

GAS SUPPLIER TARIFF (or Supplier Tariff) - PGW Supplier Tariff Pa PUC No. 1, as supplemented or amended from time to time in accordance with law.

LIQUEFIED NATURAL GAS ("LNG") – Natural gas that has been liquified by reducing the temperature to minus two hundred and sixty degrees Fahrenheit (-260°F) at atmospheric pressure.

11. FINANCIAL SECURITY

~~11.1. The purpose of the security requirement is to ensure a Natural Gas Supplier's ("NGS") financial responsibility. A Supplier shall provide financial security to ensure that the Company is able to receive, without undue delay, funds or other forms of remuneration sufficient to meet the financial consequences of a Supplier's failure to perform its Natural Gas Supply Service obligations hereunder. Company may also use such forms of financial security to ensure the ability of a Supplier to pay the penalties authorized by this Supplier Tariff.~~

~~11.2. The amount and the form of the security, if not mutually agreed upon by PGW and the NGS, shall be based on criteria in accordance with Applicable Law. Financial security shall be provided in a form that is acceptable to Company. Acceptable forms of financial security include, but are not limited to, cash deposits, performance bonds and letters of credit (hereinafter, "Surety"). Company, at its discretion, may not require a credit review if a Supplier has obtained a license to provide Natural Gas Supply Services to retail customers from the PUC within one (1) year.~~

~~11.3. Unless Company otherwise agrees, the minimum level of financial security, in whatever form, shall be no less than the total of the following:~~

~~11.3.A.~~

~~11.3.A.1. The Company's exposure for gas forwarded to the Supplier based on a design winter,~~

~~11.3.A.2. Pipeline demand charges in the event of a Supplier default, and~~

~~11.3.A.3. The Company's exposure related to honoring the Supplier's contract price within a billing period.~~

~~11.3.B. Each of these components are detailed below:~~

~~11.3.B.1. Forwarded gas component: [(projected Supplier customer pool storage volumes for Nov. - March based on design winter) x (most recent Company 1307(f) filing average delivered commodity cost for Nov. - March)].~~

~~11.3.B.2. Pipeline capacity demand charges component: [DCQ x 90 days x (most recent Company 1307(f) filing pipeline demand charges)].~~

~~11.3.B.3. Interim billing period component: [Jan.'s volume x 30 days x 10% assumed difference in Supplier's contract price to the Company's commodity cost)].~~

~~11.4 — In addition to the above, a Supplier shall provide financial security, in the form of a performance bond payable upon order of the Commission or payable directly to the Commission, in an amount that is projected to be necessary to provide reimbursement to residential customers who may be owed supplier funds (including deposits, prepayments or restitution) in the event that a Supplier exits the market. The level of the performance bond shall be established in consultation with the Commission or the Pennsylvania Office of Consumer Advocate. A Supplier may seek a waiver from the Commission of the amount and form of the security. The Commission shall hold and supervise this bond.~~

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA First Class Mail

GASMARK - UGI Energy Services, Inc.
1100 Berkshire Blvd.
Wyomissing, PA 19610
Attn: Peter D'Orazio

Hess Corporation
One Hess Plaza
Woodbridge, NJ 07095
Attn: Deborah O. Lenny

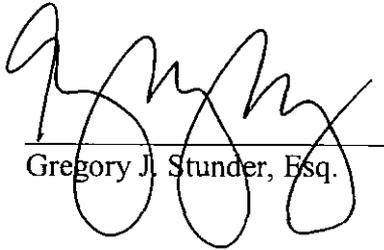
PPL EnergyPlus, LLC
Two North Ninth Street (GENPL7)
Allentown, PA 18101
Attn: Scott Porter

Sprague Energy
Two International Dr (Suite 200)
Portsmouth, N.H. 03801
Attn: David Pickens

RECEIVED

JAN 28 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



Gregory J. Stunder, Esq.

Date: January 28, 2011

FedEx US Airbill

Express

FedEx Tracking Number

8720 8568 7763

Form ID No.

0215

Recipient's Copy

RECIPIENT: PEEL HERE

1 From This portion can be removed for Recipient's records.

Date 1-28-11 FedEx Tracking Number 872085687763

Sender's Name Brewer, Stanley, Esq Phone 215-274-6877

Company PHILADELPHIA GAS WORKS

Address 800 W MONTGOMERY AVE

Dept./Room/Suite/Room

City PHILADELPHIA State PA ZIP 19122-2898

2 Your Internal Billing Reference

To Recipient's Name Rosemary Chiavetta Phone

Company PA-111C

Address Commerwellth K. V. & E. Building
We cannot deliver to P.O. boxes or P.O. ZIP codes.

HOLD Weekday
FedEx location address
REQUIRED. NOT available for
FedEx First Overnight.

Address 1111 Market Street - 11th Floor
Use this line for the HOLD location address or for continuation of your shipping address.

HOLD Saturday
FedEx location address
REQUIRED. Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.

City Philadelphia State PA ZIP 19106

0418756096



8720 8568 7763

4a Express Package Service

* To most locations.

Packages up to 150 lbs.

- FedEx Priority Overnight
Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Standard Overnight
Next business afternoon. * Saturday Delivery NOT available.
- FedEx First Overnight
Earliest next business morning delivery to select locations.*
- FedEx 2Day
Second business day. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Express Saver
Next business afternoon. * Saturday Delivery NOT available.

EXP SAVER

4b Express Freight Service

** To most locations.

Packages over 150 lbs.

- FedEx 1Day Freight
Next business day. ** Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected. FedEx 1Day Freight Booking No.
- FedEx 2Day Freight
Second business day. ** Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx 3Day Freight
Third business day. ** Saturday Delivery NOT available.

5 Packaging

* Declared value limit \$500.

- FedEx Envelope* FedEx Pak*
Includes FedEx Small Pak and FedEx Large Pak
- FedEx Box
- FedEx Tube
- Other

6 Special Handling and Delivery Signature Options

- SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx Express Saver, or FedEx 3Day Freight.
- No Signature Required
Package may be left without obtaining a signature for delivery.
- Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.
- Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies for residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

- One box must be checked.
- No Yes
As per attached Shipper's Declaration. Shipper's Declaration not required.
 - Dry Ice
Dry ice, 3, UN 1845 _____ x _____ kg
 - Cargo Aircraft Only
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

7 Payment Bill to:

- Obtain recip. Acct. No.
- Sender Acct. No. in Section Recipient Third Party Credit Card Cash/Check
- Enter FedEx Acct. No. or Credit Card No. below.

Total Packages Total Weight _____ lbs. Credit Card Auth. _____

*Our liability is limited to \$100 unless you declare a higher value. See the current FedEx Service Guide for details.

605

FedEx.com 1.800.561.6854 1.800.463.3339