



April 12, 2013

VIA ELECTRONIC FILING

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

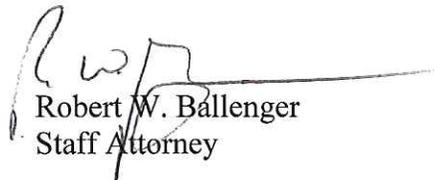
Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-2008-2073938

Dear Secretary Chiavetta,

Enclosed for filing is the Prehearing Conference Memorandum of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia in the above-captioned proceeding.

All parties are being contemporaneously served pursuant to the attached Certificate of Service.

Sincerely,



Robert W. Ballenger
Staff Attorney

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2008-2073938
	:	
Philadelphia Gas Works	:	

**Pre-Hearing Memorandum of Tenant Union Representative Network
and Action Alliance of Senior Citizens of Greater Philadelphia**

The Tenant Union Representative Network (TURN) and Action Alliance of Senior Citizens of Greater Philadelphia (hereinafter “TURN et al.”), through counsel, hereby submit this Pre-Hearing Memorandum in the above-captioned matter.

I. Procedural history.

TURN et al. incorporate by reference the procedural history set forth in the Administrative Law Judge Pell’s Prehearing Conference Order issued April 5, 2013 in this matter.

II. Topics to be addressed identified in the Prehearing Conference Order.

1. Proposed plan and schedule of discovery. TURN et al. will accept any discovery schedule agreeable to the parties which provides reasonable opportunity to determine the bases

for the parties' positions.

2. Possibility of settlement. TURN et al. are prepared to participate in settlement discussions.

3. Issues. (a) Does the proposal presented for approval satisfy the standards set forth in the April 13, 2011 Secretarial Letter? (b) With respect to the costs of billing services to be designed, implemented and rendered by the natural gas distribution company on behalf of a natural gas supplier, is the proposal in compliance with Section 2205(c) of the Gas Choice Act? (c) Are the costs of proposed consumer education programs about natural gas suppliers operating in PGW's service territory reasonably projected and justified by the benefits to be realized by customers from such programs? (d) Do the provisions for recovery of costs associated with proposed consumer education programs allocate such costs in a manner consistent with the benefits to be achieved by the parties? (e) Such other issues which may arise in this proceeding.

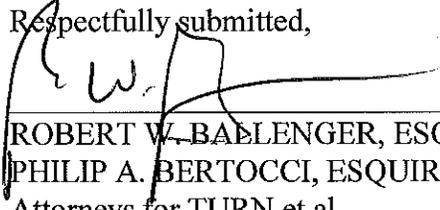
(4) Amount of hearing time needed. TURN et al. are not able at this stage of the proceeding to estimate how much hearing time will be required.

(5) Witnesses. TURN et al. have not engaged an expert witness at this time.

(6) Schedule for submission of testimony, hearings and briefs. TURN et al. will work with the parties to establish an acceptable and reasonable schedule for the submission of testimony, hearings and briefs.

(7). Other appropriate matters. None at this time.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. W. Baelenger', is written over a horizontal line. The signature is stylized and somewhat cursive.

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April 12, 2013

Pennsylvania Public Utility Commission
v.
Philadelphia Gas Works

:
: Docket No. R-2008-2073938
:

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Pre-Hearing Memorandum upon the parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

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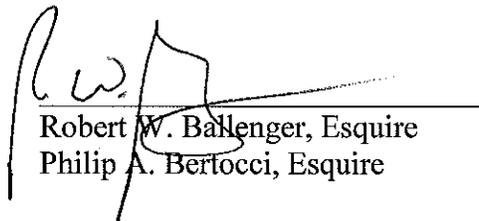
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