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November 16, 2016

Via Hand Delivery

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Philadelphia Gas Works Universal Service and Energy Conservation Plan 2017- 2020
Docket No. M-2016-2542415

Petition of Philadelphia Gas Works for Approval of 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
Docket No. P-2014-2459362

Dear Secretary Chiavetta:

On behalf of Philadelphia Gas Works (“PGW”) enclosed for filing please find its First Amendment to Universal Service and Energy Conservation Plan for 2017-2020 (“Amended Plan”). Both clean and red-line versions are included. This Amended Plan is being submitted consistent with the directives of the Commission set forth in its Final Opinion and Order entered November 1, 2016 at Docket Number P-2014-2459362 approving PGW’s Demand Side Management Plan (“DSM Plan”).

Pursuant to the DSM Order, PGW was directed to submit an amendment to its Proposed 2017-2020 Universal Service and Energy Conservation Plan to address issues regarding PGW’s Low Income Usage Reduction Program (“LIURP”). Please be advised that the LIURP Needs Assessment provided in the attached Amended Plan differs from the Needs Assessment presented in the DSM proceeding for a number of reasons. In the DSM proceeding, PGW’s Needs Assessment was limited to the data and evidence presented in the proceeding (which was initiated in 2014), as well as the Tentative Order’s model and data, including but not limited to the costs per job. In contrast, in this Amended Plan PGW has provided a more detailed Needs Assessment based on current data which also utilizes (i) factors used by other regulated utilities to arrive at their number of customers, and (ii) updated costs per job.

Also, please be advised that PGW intends to submit a compliance filing regarding the programs of its DSM Plan on or before January 2, 2017 at the same time it files its annual DSM report.

Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/lww
Enclosure

cc: Hon. Marta Guhl, w/enc.
Hon. Christopher Pell w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's First Amendment to Universal Service and Energy Conservation Plan upon the parties and persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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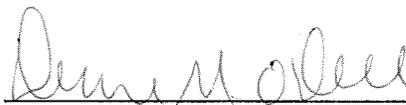
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