



**peco**<sup>SM</sup>

AN EXELON COMPANY

March 31, 2022

**VIA E-FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: PECO Energy Company – General Base Rate Filing For Gas Division  
Docket No. R-2022-3031113**

Dear Secretary Chiavetta:

Pursuant to Section 1308 of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 1308, enclosed for filing on behalf of PECO Energy Company (“PECO” or the “Company”) is PECO’s Tariff Gas – Pa. P.U.C. No. 5 (“Tariff No. 5”). Tariff No. 5 sets forth proposed rates designed to produce an increase in the Company’s annual distribution revenue of approximately \$82.1 million based on data for a fully projected future test year ending December 31, 2023.

**CONTENTS OF THE FILING**

Tariff No. 5 contains revisions in, additions to, and deletions from, certain Rules and Regulations, rate schedules and riders in the Company’s currently effective tariff. Tariff No. 5 also bears an issue date of March 31, 2022, and an effective date of May 30, 2022.

Along with Tariff No. 5, the Company is filing all the supporting data required by the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) regulations at 52 Pa. Code §§ 53.52 – 53.53, including the written direct testimony of nine witnesses, who are identified in PECO Statement No. 1, the Direct Testimony of Ronald A. Bradley. A summary of the reasons for the proposed rate increase is set forth in the Company’s Statement of Specific Reasons for Proposed Increase in Gas Rates.

The Company is filing one complete hard copy and one electronic copy through the Commission’s Sharefile website. An index of the filing is included as Attachment A to this letter.

## COUNSEL OF RECORD AND SERVICE ON THE COMPANY

PECO will be represented by the following counsel in this proceeding:

Anthony E. Gay  
Jack R. Garfinkle  
Brandon J. Pierce  
Caroline S. Choi  
PECO Energy Company  
2301 Market Street  
P.O. Box 8699  
Philadelphia, PA 19101  
215.841.4635 (dir)  
215.568.3389 (fax)  
[anthony.gay@exeloncorp.com](mailto:anthony.gay@exeloncorp.com)  
[jack.garfinkle@exeloncorp.com](mailto:jack.garfinkle@exeloncorp.com)  
[brandon.pierce@exeloncorp.com](mailto:brandon.pierce@exeloncorp.com)  
[caroline.choi@exeloncorp.com](mailto:caroline.choi@exeloncorp.com)

Kenneth M. Kulak  
Mark A. Lazaroff  
Brooke E. McGlinn  
Catherine G. Vasudevan  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103  
215.963.5384 (dir)  
215.953.5001 (fax)  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)

PECO's attorneys are authorized to accept service on behalf of the Company in this proceeding. PECO requests that the Commission and all parties serve copies of all documents in this proceeding on its attorneys.

## USE OF ALTERNATIVE METHOD OF CUSTOMER NOTIFICATION

PECO hereby advises the Commission that it has elected to use the alternative method of customer notification set forth in the Commission's regulations at 52 Pa. Code § 53.45(b)(4). Consequently, as required by that regulation, PECO will notify its customers of the proposed rate increase through bill inserts along with paid advertisements in major local newspapers.<sup>1</sup> PECO also agrees to extend from 60 to 90 days the minimum period within which the filing of a complaint places the burden of proof upon the Company with respect to proposed rates, pursuant to 52 Pa. Code § 53.45(b)(4)(vi).

## REQUEST FOR CONFIDENTIAL TREATMENT OF PROPRIETARY INFORMATION

Certain Company responses to the Commission filing requirements and a testimony exhibit contain information that PECO considers to be proprietary and confidential. These materials have been marked *Confidential* and are being included in separate electronic files submitted to the Commission. PECO requests that these materials be treated confidentially by the Commission, including its various Offices and Bureaus. In particular, the Company requests

---

<sup>1</sup> In addition, PECO is posting notice of this filing at its Company headquarters pursuant to 52 Pa. Code § 53.45(b)(1), posting the filing to its website, and issuing a news release describing the proposed changes to local newspapers and to local radio and television stations, pursuant to 52 Pa. Code § 53.45(b)(2).

Rosemary Chiavetta, Secretary  
March 31, 2022  
Page 3

that the *Confidential* material be excluded from the Commission's public document folder and not be disclosed to the public. PECO intends to request the entry of an appropriate Protective Order from the presiding Administrative Law Judge(s) to maintain the confidentiality of such material if it is to be provided to parties in this case.

### **CERTIFICATE OF SERVICE**

As indicated on the attached Certificate of Service, the Company has served copies of this filing on the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, and the Office of Small Business Advocate.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "R.G.W.", followed by a horizontal flourish.

Richard G. Webster, Jr.

Enclosures

c: Certificate of Service (w/encls.)

## ATTACHMENT A

**PECO ENERGY COMPANY 2022 GAS RATE CASE  
DOCKET NO. R-2022-3031113**

**FILING INDEX**

**Volume I**

**Cover Letter**

**Index**

**Statement of Specific Reasons**

**Plain Language Statement of Reasons**

**Section 53.52 Filing Requirements**

**Customer Notice**

**PECO Verification**

**PECO Exhibit 1: PECO Gas Tariff No. 4 - Current**

**PECO Exhibit 2: PECO Gas Tariff No. 5 - Proposed**

**PECO Statement No. 1: Direct Testimony of Ronald A. Bradley**

- **PECO Exhibit RAB-1: Number of Incoming Leak Tickets for Grade 1, 2A and 2B Leaks – 2015-2021**
- **PECO Exhibit RAB-2: Percent of First Responder Calls Responded to in 1 Hour or Less**

**PECO Statement No. 2: Direct Testimony of Robert J. Stefani**

- **PECO Exhibit RJS-1: Business Services Company Operations & Maintenance Costs**

**PECO Statement No. 3: Direct Testimony of Michael J. Trzaska**

- **PECO Exhibit MJT-1: Principal Accounting Exhibit - Fully Projected Future Test Year ended December 31, 2023**

- **PECO Exhibit MJT-2: Principal Accounting Exhibit - Future Test Year ending December 31, 2022**
- **PECO Exhibit MJT-3: Principal Accounting Exhibit - Historic Test Year ended December 31, 2021**

**Volume II**

**PECO Statement No. 4: Direct Testimony of Caroline Fulginiti**

- **PECO Exhibit CF-1: Annual Depreciation Accruals Related to Utility Plant in Service for 2021**
- **PECO Exhibit CF-2: Estimated Annual Depreciation Accruals Related to Utility Plant in Service for 2022**
- **PECO Exhibit CF-3: Estimated Annual Depreciation Accruals Related to Utility Plant in Service for 2023**
- **PECO Exhibit CF-4: 2018 Depreciation Study – Calculated Annual Depreciation Accruals Related to Gas Plant as of December 31, 2018**

**PECO Statement No. 5: Direct Testimony of Paul R. Moul**

- **PECO Exhibit PRM-1: Cost of Capital and Fair Rate of Return**

**PECO Statement No. 6: Direct Testimony of Jiang Ding**

- **PECO Exhibit JD-1: Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Summary of Results**
- **PECO Exhibit JD-2: Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Allocation By Rate Class**
- **PECO Exhibit JD-3: Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Allocation By Functional Classification**
- **PECO Exhibit JD-4: Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Unitized Functionally Classified Revenue Requirement**
- **PECO Exhibit JD-5: Customer-Related Revenue Requirement and Customer Charge**

- **PECO Exhibit JD-6: FPFTY 2023 - Cost of Service Study - External Allocation Factors**
- **PECO Exhibit JD-7: Derivation of Peak Day Demand (NARUC Manual, p. 48)**

**PECO Statement No. 7: Direct Testimony of Joseph A. Bisti**

- **PECO Exhibit JAB-1: Proposed Revenue Allocation, and Rates of Return by Rate Class**
- **PECO Exhibit JAB-2: Relevant Gas Service Tariff Pages (Redline to Show Changes)**
- **PECO Exhibit JAB-3: Comparison of Residential Customer Charges for Pennsylvania Natural Gas Distribution Utilities**
- **PECO Exhibit JAB-4: Proof of Revenues at Present and Proposed Rates – Residential (GR)**

**PECO Statement No. 8: Direct Testimony of Benjamin S. Yin**

- **PECO Exhibit BSY-1: Calculation of Theft Investigation Fee**
- **PECO Exhibit BSY-2: Calculation of the Gas Procurement Charge (“GPC”)**
- **PECO Exhibit BSY-3: Components and Calculation of the Merchant Function Charge (“MFC”)**
- **PECO Exhibit BSY-4: Relevant Gas Supplier Coordination Tariff Pages (Including a Blackline to Show Proposed Changes)**

**PECO Statement No. 9 – Doreen L. Masalta**

- **PECO Exhibit DLM-1: PECO Gas Utility EE&C Benchmarking**
- **PECO Exhibit DLM-2: 2021-2027 Breakdown of Participation, Savings and Spending**
- **PECO Exhibit DLM-3: Program Year 2023 Forecast**

**PECO Statement No. 10 – Kelly Colarelli**

**Volume III**

**Defined Filing Requirements  
Section 53.53 – Valuation - I-A and I-C**

**Defined Filing Requirements  
Section 53.53 – Rate of Return - II-A and II-C**

**Volume IV**

**Defined Filing Requirements  
Section 53.53 – Balance Sheet & Operating Statement - III-A**

**Defined Filing Requirements  
Section 53.53 – Balance Sheet & Operating Statement - III-E**

**Defined Filing Requirements  
Section 53.53 – Rate Structure - IV-B**

**Volume V**

**Defined Filing Requirements  
Section 53.64(c) Gas Supply**

**Supplemental Data Responses  
Cost of Service (COS)**

**Supplemental Data Responses  
Rate of Return (ROR)**

**Supplemental Data Responses  
Revenue Requirements (RR)**



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION</b>	:	
	:	
v.	:	<b>Docket No. R-2022-3031113</b>
	:	
<b>PECO ENERGY COMPANY – GAS DIVISION</b>	:	
	:	

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of **PECO Energy Company – General Base Rate Filing for Gas Division** on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

**BY OVERNIGHT MAIL**

Patrick M. Cicero  
Interim Acting Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
[pcicero@paoca.org](mailto:pcicero@paoca.org)

Teresa R. Wagner  
Executive Director  
Office of Small Business Advocate  
Forum Place – First Floor  
555 Walnut Street  
Harrisburg, PA 17101  
[tereswagne@pa.gov](mailto:tereswagne@pa.gov)

Richard Kanaskie  
Director & Chief Prosecutor  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commerce Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17105-3265  
[rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)



---

Kenneth M. Kulak (Pa. No. 75509)  
Catherine G. Vasudevan (Pa. No. 210254)  
Brooke E. McGlinn (Pa. No. 204918)  
Mark A. Lazaroff (Pa. No. 315407)  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
215.963.5384 (bus)  
215.963.5001 (fax)  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)

Anthony E. Gay (Pa. No. 74624)  
Jack R. Garfinkle (Pa. No. 81892)  
Brandon J. Pierce (Pa. No. 307665)  
Caroline S. Choi (Pa. No. 320554)  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103  
215.841.4220 (dir)  
215.568.3389 (fax)  
[anthony.gay@exeloncorp.com](mailto:anthony.gay@exeloncorp.com)  
[jack.garfinkle@exeloncorp.com](mailto:jack.garfinkle@exeloncorp.com)  
[brandon.pierce@exeloncorp.com](mailto:brandon.pierce@exeloncorp.com)  
[caroline.choi@exeloncorp.com](mailto:caroline.choi@exeloncorp.com)

Dated: March 31, 2022

*Counsel for PECO Energy Company*