

100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166 Tel: 717.232.8000 • Fax: 717.237.5300 Adeolu A. Bakare Direct Dial: 717.237.5290 Direct Fax: 717.260.1744 abakare@mcneeslaw.com

March 21, 2018

Nancy Brockway Hearing Officer 10 Allen Street Boston, MA 02131

RE: In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater and Stormwater Rates and Related Charges - Fiscal Years 2019-2021

Dear Hearing Officer Brockway:

Enclosed please find Philadelphia Large Users Group's ("PLUG") Notice to Participate in Technical Hearings in the matter of the Philadelphia Water Department's proposed change in water, wastewater and stormwater rates and related charges for Fiscal Years 2019-2021. A copy of this notice has been served by e-mail on the parties listed on the enclosed certificate of service.

Sincerely,

McNEES WALLACE & NURICK LLC

By

Adeolu A. Bakare

Enclosure c: Service List

Harrisburg, PA • Lancaster, PA • Scranton, PA • State College, PA • Columbus, OH • Frederick, MD • Washington, DC

BEFORE THE PHILADELPHIA WATER, SEWER, & STORMWATER RATE BOARD

NOTICE OF INTENT TO PARTICIPATE IN THE MATTER OF PHILADELPHIA WATER DEPARTMENT'S PROPOSED INCREASE FOR RATES FOR WATER, WASTEWATER, AND STORMWATER UTILITY SERVICES – FY 2019-2021

1. Name of Organization or Individual:

Philadelphia Large Users Group ("PLUG")

2. Name & Title of Org'n. Representative or Contact Person:

James P. Dougherty, Esq., Charis Mincavage, Esq., & Adeolu A. Bakare, Esq. of McNees Wallace & Nurick LLC.

- 3.
 Address: <u>100 Pine Street</u>
 4. Phone: (717) 232-8000

 City: <u>Harrisburg</u>
 State: <u>PA</u>
 Zip: <u>17108</u>
 Fax: (717) 260-1744
- 5. Brief Description of Organization (size, purpose, constituency, etc.):

<u>PLUG is an ad hoc group of large commercial, institutional, and industrial customers</u> receiving water service from the Philadelphia Water Department. <u>PLUG members</u> require substantial volumes of water in their operations, and the proposed rate filing may have an adverse impact on the costs of their operations. The members of PLUG are attached as Appendix A hereto. This list will be updated as necessary.

6. Issues of Interest:

PLUG is concerned with several of the Philadelphia Water Department's ("PWD" or "Department") proposed rate changes. Specifically, PLUG is interested in the Department's proposal to increase both its water, wastewater, and stormwater service and quantity charges and whether such increases are just, reasonable, and nondiscriminatory. In addition, PLUG is interested in PWD's proposed TAP Rider and the potential costs allocated to large industrial accounts. PLUG also reserves the right to address additional issues that may arise during this proceeding, including matters raised by other intervening parties.

7. PLUG anticipates being an active party participating in technical hearings and is considering the necessity to submit Participant Testimony.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By____ 1

James P. Dougherty (I.D. No. 59454) Charis Mincavage (I.D. No. 82039) Adeolu A. Bakare (I.D. No. 208541) 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 Phone: (717) 232-8000 Fax: (717) 260-1744

Counsel to Philadelphia Large Users Group

Dated: March 21, 2018

APPENDIX A PHILADELPHIA LARGE USERS GROUP

Newman & Company, Inc.

Temple University

Thomas Jefferson University

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document by e-mail upon the parties listed below:

Daniel P. Delaney, Esq. Dan.delaney@klgates.com

Anthony R. Holtzman, Esq. Anthony.holtzman@klgates.com

H. Alfred Ryan, Esq. Halfred.ryan@exeloncorp.com

Robert Ballenger, Esq. rbellenger@clsphila.org

Andre C. Dasent, Esq. andre.c.dasent@gmail.com

Steve Cusano, Esq. Steve.Cusano@phila.gov

Stephanie Wein stephanie@pennenvironment.org

David Masur davidmasur@pennenvironment.org

Michael Skiendzielewski skiadvocat@aol.com

3/0

Adeolu A. Bakare (PA Attorney I.D. No. 208541)

Dated: March 21, 2018