



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

April 20, 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") Updated 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

**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., Adeolu A. Bakare, Esq., Matthew L. Garber, Esq. of McNees
Wallace & Nurick LLC.

3. Address: 100 Pine Street

4. Phone: (717) 232-8000

City: Harrisburg

State: PA

Zip: 17108

Fax: (717) 260-1744

5. Brief Description of Organization (size, purpose, constituency, etc.):

PLUG is an ad hoc group of large commercial, institutional, and industrial customers receiving water service from the Philadelphia Water Department. PLUG members 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



James P. Dougherty (I.D. No. 59454)

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

Matthew L. Garber (I.D. No. 322855)

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: April 20, 2018

APPENDIX A
PHILADELPHIA LARGE USERS GROUP

Einstein Healthcare Network

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

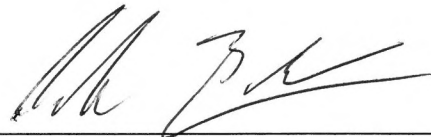
Andre C. Dasent, Esq.
andre.c.dasent@gmail.com

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

Stephanie Wein
stephanie@pennenvironment.org

David Masur
davidmasur@pennenvironment.org

Michael Skiendzielewski
skiadvocat@aol.com



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

Dated: April 20, 2018