

**PUBLIC COMMENTS RECEIVED BY PGW
TO
LOW CARBON PATHWAYS COMMUNITY MEETING
ON JUNE 3, 2026**

**Low Carbon Pathways Community Meeting Public Comments: Following
Community Meeting on June 3rd, 2026**

- Submitted on: Saturday, June 13, 2026 at 12:32pm
- Company/Organization:
- Name: neha
- Residential Zip Code: [REDACTED]
- Email: [REDACTED]
- Comments: - We must discuss the health impact of methane and the health benefits of decarbonization.

- We need to develop plans for phasing out the gas distribution network and for heating buildings at an affordable cost without gas back-up as part of the full electrification scenario.

- We should consider how energy transition investments can be fully integrated with comprehensive home repairs and weatherization, and fully account for the health, economic, and resiliency benefits of those building upgrades.

-
- Submitted on: Wednesday, June 17, 2026 at 9:07am
 - Company/Organization:
 - Name: Gregory Holt
 - Residential Zip Code: [REDACTED]
 - Email: [REDACTED]
 - Comments: PGW has a very short time to achieve an enormous transformation. Comparing models is all well and good as long as PGW is taking immediate preliminary actions. The models are pointing in the same direction, so initial tactics will be similar across scenarios. PGW has no excuse not to immediately begin decarbonizing while also following good processes to study, compare, and select long term strategies. Begin to decarbonize now, now, now.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos.	R-2025-3053112
Office Of Consumer Advocate	:		C-2025-3053827
Office Of Small Business Advocate	:		C-2025-3053978
The Philadelphia Industrial and Commercial	:		C-2025-3054216
Gas Users Group	:		
	:		
v.	:		
	:		
Philadelphia Gas Works	:		
	:		
Petition Of Philadelphia Gas Works for	:		
Waiver of Provisions of Act 11 to Modify the	:		
Definition of the Charges Subject to the	:		P-2025-3053659
Distribution System Improvement Charge Cap	:		
or, Alternatively, to Increase the Current DSIC	:		
Cap	:		

**COMMENTS OF THE TENANT UNION REPRESENTATIVE NETWORK (TURN)
AND THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA (CAUSE-PA)
REGARDING PGW'S JUNE 3, 2026 LOW CARBON PATHWAYS
COMMUNITY ENGAGEMENT MEETING**

June 17, 2026

The Tenant Union Representative Network (“TURN”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through counsel, submit these written comments in response to Philadelphia Gas Works’ (“PGW”) June 3, 2026, community engagement meeting (“June 2026 Meeting”) regarding PGW’s Low Carbon Pathways Study (“Study”). PGW held the June 2026 Meeting pursuant to the all-parties settlement in PGW’s 2025 Base Rate Case.¹ The settlement requires PGW to convene

¹ See Pa. PUC v. PGW, Docket No. R-2025-3053112, Joint Petition for Settlement (August 7, 2025) at 16-17.

community engagement meetings and consider comments to inform its evaluation of pathways for long-term greenhouse gas emission reductions in Philadelphia.²

At this stage, TURN and CAUSE-PA emphasize the following core principles. First, there is broad consensus that climate change caused by greenhouse gas emissions is increasing energy insecurity globally.³ Low-income Philadelphians already struggle to maintain heating and cooling amid sharply rising prices.⁴ Accordingly, and second, PGW should reduce its greenhouse gas emissions. In doing so, PGW must also protect low-income customers. This means investing in interventions that provide real household-level benefits, such as weatherization and energy efficiency measures. It also means committing to a transition path that does not leave economically vulnerable Philadelphians stranded on an increasingly expensive gas system.

These comments are preliminary. TURN and CAUSE-PA expect to provide more detailed comments after PGW provides substantive information about its Study, including decarbonization technologies, modeling assumptions, cost estimates, bill impact analysis, and implementation proposals.⁵

² Id.

³ See, generally, D. Hernández & J. Laird, *Powerless: The People's Struggle for Energy* (2025).

⁴ See Fisher, Sheehan & Colton, *The Home Energy Affordability Gap: Pennsylvania* (April 2023) at 1, http://www.homeenergyaffordabilitygap.com/downloads/2022_Released_Apr23/ZIP_Archives/2022_Pennsylvania.zip (last visited 06/17/2026).

⁵ PGW stated in its June 2026 Meeting presentation that the Study would assess long-term decarbonization pathways while balancing safety, affordability, reliability, and sustainability. PGW also stated that the Study would evaluate customer impacts, including rates and adoption potential, and is currently evaluating a hybrid pathway and a full electrification pathway. Those commitments are important. But they must be given concrete meaning through the modeling, metrics, and implementation framework PGW develops.

I. PGW must prioritize affordability alongside emissions reductions.

PGW's service territory is marked by deep poverty, high energy burdens, aging housing stock, and customers who already struggle to maintain essential utility services.⁶ In the 2025 Base Rate Case, TURN and CAUSE-PA intervened to represent the interests of economically vulnerable and low-income PGW residential customers who would be disproportionately harmed by the imposition of unjust or unreasonable rates.⁷

The 2025 Base Rate Case record shows that affordability concerns are not marginal. As of 2024, PGW reported 176,960 estimated low-income customers, representing approximately 37% of its residential customer base.⁸ Yet more than two-thirds of PGW's estimated low-income customers were not enrolled in PGW's Customer Responsibility Program, meaning they lacked critical affordability protections and were at greater risk of termination for nonpayment.⁹ A decarbonization plan that relies primarily on ratepayer-funded infrastructure spending without a strategy to reduce household energy burdens, manage declining gas demand, and protect customers who cannot afford to leave the gas system on their own would only increase the energy insecurity PGW's low-income customers already experience.

Decarbonization and affordability are not mutually exclusive. PGW's Study should reflect that reality by including targeted low-income components for every pathway. In addition, PGW should separately model impacts of each pathway on low-income customers, CRP

⁶ See Pa. PUC v. PGW, Docket No. R-2025-3053112, PGW St. No. 1 (Adamucci) at 4, 29-31 (referencing the high poverty rate in PGW's service territory) [hereinafter "Adamucci Direct Testimony"]; Pa. PUC v. PGW, Docket No. R-2025-3053112, TURN & CAUSE-PA St. No. 1 (Cicero) at 12-15 [hereinafter "Cicero Direct Testimony"].

⁷ See Pa. PUC v. PGW, Docket No. R-2025-3053112, Petition to Intervene of the Tenant Union Representative Network and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania at ¶ 15.

⁸ See Cicero Direct Testimony at 17 (citing PGW Supp. Response to OCA II-12, Attach.).

⁹ Id. at 17-18. Utility affordability is directly correlated to a household's ability to maintain access to essential utility services. In 2024, only 3% of CRP participants had service terminated for nonpayment, compared to 22% of confirmed low-income customers not enrolled in CRP. Id. at 27-28.

customers, low-income customers not enrolled in CRP, tenants, homeowners, high-usage households, and customers in high energy-burden neighborhoods. For any pathway involving electrification, PGW should also evaluate combined gas and electric bills, equipment costs, repair needs, and total household energy burden.

II. PGW should prioritize weatherization, energy efficiency, and whole-home repairs.

PGW appropriately identified weatherization as a low-carbon technology in its presentation during the June 2026 Meeting. TURN and CAUSE-PA urge PGW to treat weatherization measures, energy efficiency upgrades, and whole-home repair coordination as foundational components of any low-carbon pathway, not as secondary customer assistance programs.

The least risky and most immediately beneficial emissions reductions are those that reduce wasted energy while improving comfort, safety, and affordability. PGW's Low Income Usage Reduction Program ("LIURP"), known as Home Comfort, already exists to reduce high usage caused by home energy inefficiencies that low-income households cannot afford to address on their own. LIURP provides critical assistance because it can improve bill affordability, reduce arrearages, and lower termination risk over the long term.¹⁰ As TURN and CAUSE-PA stressed in testimony during the Base Rate Case, and as the final settlement reflects, deeper investment in home repair, energy efficiency, and weatherization interventions – along with improved coordination with similar initiatives in PGW's service territory – are essential first steps to simultaneously reducing household energy usage and improving affordability.¹¹

¹⁰ Id. at 106-09.

¹¹ Id.

Because these household-level interventions also stand to reduce greenhouse gas emissions in PGW's service territory by lowering household-level usage, PGW should prioritize them in its decarbonization planning.

III. Electrification must not leave low-income customers behind.

Electrification should play a central role in Philadelphia's long-term greenhouse gas reduction strategy. But unmanaged electrification creates serious equity risks. Customers with more resources may be able to electrify early and reduce or eliminate gas usage. Customers with fewer resources may be unable to afford electrification upgrades (such as heat pumps, electric water heaters, and induction stoves) or the preliminary weatherization and home repairs that enable them. Without careful planning, low-income customers could be left behind on a gas system with fewer customers paying for ongoing fixed costs.

This risk is not speculative. PGW itself noted during the 2025 Base Rate Case that per-customer gas usage is declining in its service territory.¹² It attributes at least part of this decline in demand to warmer weather,¹³ a trend that will only continue as fossil fuel emissions contribute to global warming.¹⁴ Along with PGW, Dr. Dorie Seavey testified in that proceeding that customer attrition and reduced demand can be expected as some customers move toward electrified heating and cooking technologies.¹⁵ Dr. Seavey also noted that, though it raised concerns about declining demand, PGW did not provide a long-term gas demand analysis or

¹² Adamucci Direct Testimony at 3, 10, 11 (noting "declining use per customer, loss of customers, changes in the economy, etc." and "declining gas sales" impacting PGW's operations); see Pa. PUC v. PGW, Docket No. R-2025-3053112, EJA St. No. 1 (Seavey) at 3-4 [hereinafter "Seavey Direct Testimony"].

¹³ Pa. PUC v. PGW, Docket No. R-2025-3053112, PGW St. No. 3 (Lover) at 6.

¹⁴ See Seavey Direct Testimony at 9-10.

¹⁵ Id.

analyze how declining gas sales would affect future revenue, customer distribution charges, or affordability.¹⁶

That analysis must be included in the Low Carbon Pathways Study. PGW should model how each decarbonization scenario would impact low- and moderate-income customers, with particular attention to remaining costs on the gas system and how they are allocated. PGW should also identify safeguards to prevent a transition where higher-income households electrify first while low-income households are left paying escalating costs for legacy infrastructure.¹⁷ For any electrification pathway, PGW should include no-cost or deeply subsidized measures for low-income households, including the repairs and upgrades needed to make electrification feasible.

IV. PGW must evaluate alternatives to maintaining gas infrastructure.

PGW's presentation identified thermal energy networks as an emerging opportunity and included renewable natural gas, advanced renewable natural gas, hydrogen, gas heat pumps, and carbon capture among the technologies under review. TURN and CAUSE-PA do not oppose PGW studying those options. But PGW should not assume that these technologies will provide affordable, scalable, or equitable solutions for low-income customers. As previously noted, PGW's current business model faces pressure from declining gas sales, customer attrition, and sustained capital spending on legacy gas infrastructure. As Dr. Seavey explained, PGW is

¹⁶ *Id.* at 10-11.

¹⁷ *See id.* at 60-61 ("At some point, declining sales and customer attrition may in fact challenge [PGW's] solvency, as wealthier customers leave the gas system and PGW's remaining customers are left with rising per-customer costs for maintaining the system.")

entering a phase in which it must maintain and remediate legacy assets while facing declining sales and a shrinking customer base.¹⁸

PGW's study should therefore include a capital spending and stranded cost analysis in its Study. The Study should identify which planned capital investments are necessary, which investments could become underutilized, and which investments can be deferred, avoided, or replaced with lower-cost alternatives. In addition, PGW should evaluate low-carbon fuels and emerging technologies based on realistic supply constraints, lifecycle emissions, customer costs, infrastructure needs, safety considerations, and deliverability in Philadelphia.

The Study should also develop a methodology to consistently account for the true cost of emissions. This means factoring in, as a reduction in cost, the full life-cycle value of emission reductions attributable to alternatives. This also means factoring in the added cost of emissions attributable to gas infrastructure.

The Study should be utilized to inform PGW annual budgets and be reexamined as new technologies and costs of alternatives adjust to market forces. Before committing ratepayer dollars to long-lived gas infrastructure, PGW should ensure that and explain why there are no lower-cost alternatives that can safely and reliably serve customers while also achieving emission reduction goals.

V. PGW should make the Study development process open, transparent, and responsive to comments.

PGW's Low Carbon Pathways Study will address issues with significant long-term consequences for Philadelphia residents, PGW customers, and the City's climate goals. The

¹⁸ *Id.* at 48-49. Dr. Seavey also testified that PGW should expand the solutions considered for pipeline replacement to include advanced leak repair, pipeline decommissioning or derating, thermal energy networks, and other non-pipeline alternatives. See *id.* at 66-67.

process for developing the Study must therefore be open, transparent, and meaningfully responsive to public input. The June 2026 Meeting was an important first step. But public engagement cannot be limited to bookended comment opportunities at the outset and conclusion of the Study's development. Stakeholders must have a reasonable opportunity to review PGW's analysis before providing feedback on the substance of the Study.

TURN and CAUSE-PA therefore request that PGW make its Study available for public review no later than two weeks before its next community engagement meeting. Furthermore, PGW should make all written comments submitted after community engagement meetings and in response to the draft Study publicly available. The final Study should explain how PGW considered such feedback and identify changes made based on the comments. Where PGW declines to incorporate significant recommendations, it should briefly explain why.

VI. Recommendations and Conclusion

In summary, TURN and CAUSE-PA recommend that PGW incorporate the following principles into the Study and the accompanying community engagement process:

1. Model low-income customer impacts separately, including CRP customers, low-income customers not enrolled in CRP, tenants, high-usage households, and high energy-burden neighborhoods.
2. Evaluate each pathway's impact on total household energy burden, including combined gas and electric bills under any electrification or hybrid pathway.
3. Prioritize weatherization measures, energy efficiency upgrades, and whole-home repairs as core emissions-reduction strategies.
4. Analyze customer attrition, impacts on remaining customers, stranded costs, and the risk that low-income customers will be left on an increasingly expensive gas system.

5. Evaluate alternatives before committing to long-lived gas infrastructure investments, accounting for the true cost of emissions.
6. Subject low-carbon fuels and emerging technologies to rigorous cost, feasibility, emissions, and equity review.
7. Release a draft Low Carbon Pathways Study at least two weeks before the next community engagement meeting and provide it to City Council at the same time.
8. Make written comments publicly available and explain in the final Study how PGW considered and responded to stakeholder feedback.

TURN and CAUSE-PA support a serious, transparent, and equity-centered evaluation of PGW's long-term decarbonization pathways. PGW's planning choices will shape customer bills, household energy security, infrastructure investment, and emissions in its service territory for decades. Reducing emissions and providing affordable utility service are not mutually exclusive. PGW's study should chart pathways that achieve both.

Respectfully submitted,

/s/ Benjamin Clark

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June 17, 2026

Elliot S. Gold
Vice President, Corporate Planning
Philadelphia Gas Works
800 W Montgomery Ave
Philadelphia, PA 19122

Sent via email

Subject: Request for Low-Carbon Pathways Plan

Dear Mr. Gold,

As Chair of City Council's Committee on the Environment, I am writing to applaud Philadelphia Gas Works (PGW) for the initial steps it has taken to explore pathways to long-term greenhouse gas emission reductions. As PGW takes additional steps to develop its Low-Carbon Pathways Plan, we request that you provide transparency and opportunities for meaningful feedback from City stakeholders and the public. Specifically, we request that PGW make a copy of its draft Low-Carbon Pathways Plan available for public review no later than two weeks before its next community engagement meeting and make a copy of the Plan available to members of City Council. Making the plan available in advance is necessary to provide the public, City leaders, and other stakeholders time to review and prepare substantive feedback in advance of the subsequent meeting.

The City of Philadelphia's commitment to achieving carbon neutrality by 2050 requires comprehensive efforts across all City entities, including PGW. Public participation is essential to ensure this whole-of-government approach to climate action follows best practices and responds to the everyday realities of Philadelphians. PGW's June 3rd, 2026, community engagement meeting regarding its Low-Carbon Pathways Plan was a first step in the right direction. In addition to reviewing and incorporating feedback from comments provided during the June 3rd, 2026, meeting, we trust that PGW will review and consider all written comments submitted in the two weeks following the meeting. PGW's final Low-Carbon Pathways Plan should reflect the benefit of robust stakeholder input.

We look forward to reviewing PGW's Low-Carbon Pathways Plan and working with you to achieve Philadelphia's 2050 carbon neutrality goals.

Sincerely,

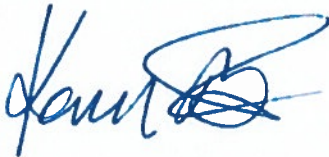
Sincerely,



Jamie R. Gauthier
Philadelphia City Councilmember, 3rd District



Nicolas O'Rourke
Philadelphia City Councilmember At-Large
Member of the Committee on the Environment



Minority Leader Kendra Brooks
Philadelphia City Councilmember At-Large
Member of the Committee on Transportation and Public Utilities.

Cc: Robert Hoaglund, Esq.
Daniel Clearfield, Esq.
Bryce R. Beard, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et
al.

v.

Philadelphia Gas Works

Docket No. R-2025-3053112
Docket No. C-2025-3053827
Docket No. C-2025-3053978
Docket No. C-2025-3054216

COMMENTS OF THE ENERGY JUSTICE ADVOCATES

June 17, 2026

I. Introduction

On October 9, 2025, the Pennsylvania Public Utility Commission (“PA PUC”) approved a settlement (the “Settlement”), to which the Energy Justice Advocates (“EJA”)¹ were a party, in the most recent rate case (“Rate Case”) of Philadelphia Gas Works (“PGW”).² As relevant to issues regarding decarbonization and public participation raised by EJA in testimony in the Rate Case, the Settlement contained a term entitled “Community Engagement,” which provides as follows:

Within 12 months of the final order in this proceeding, PGW will convene 2 community engagement meetings to inform PGW’s evaluation of various potential pathways and considerations for long-term greenhouse gas emission reductions in Philadelphia. The meetings will be held virtually. At least 1 meeting will be after work hours. The first meeting will be within 9 months following rate case order (timeline subject to revision on mutual consent of PGW and EJA).

Each meeting will include a brief presentation from PGW and time for oral comments from the public that will be at least one hour but limited to no more than two hours. PGW will also accept written comments within 2 weeks after each community engagement meeting which will be made publicly available after each meeting. PGW may incorporate feedback and comments from these meetings into its low carbon pathways evaluations and considerations, as practical and as determined by PGW.

In advance of each meeting, PGW will provide a bill message on the bills of customer assistance program participants and will post notice of the meetings on its website to encourage participation in these meetings.³

On June 3, 2026, PGW held its first community engagement meeting (the “First Community Engagement Meeting”) on long-term greenhouse gas (“GHG”) emissions reductions

¹ EJA is comprised of POWER Interfaith, Vote Solar, Clean Air Council, Sierra Club, Physicians for Social Responsibility PA, PennEnvironment, and PennPIRG.

² Pa. P.U.C., Order, *Pa. P.U.C. et al. v. Philadelphia Gas Works*, Docket No. R-2025-3053112 (Oct. 9, 2025).

³ PGW et al., Joint Petition for Settlement, *Pa. P.U.C. et al. v. Philadelphia Gas Works*, Docket No. R-2025-3053112, at 16 (Aug. 7, 2025).

pursuant to the Settlement, sharing a presentation regarding the Low Carbon Pathways Study (“Low Carbon Study”) it is in the process of preparing.⁴

EJA participated in that meeting and appreciated a productive conversation. EJA respectfully submits these comments (“Comments”) as a follow-up to the First Community Engagement Meeting and in preparation for the second meeting (“Second Community Engagement Meeting”).

II. Comments

A. The Need for Comprehensive Long-Term Planning for Affordable Decarbonization

To start, comprehensive long-term planning, with binding milestone targets, is essential to ensuring that PGW’s decarbonization is affordable and cost-effective. Performing systems-level analysis structured by clear targets from the outset is critical to setting this process up for success, particularly in light of the financial challenges PGW is facing. As EJA’s witness Dr. Dorie K. Seavey noted in the Rate Case, PGW’s gas sales per customer have been falling for the last two decades,⁵ and this trend is likely to continue.⁶ PGW also serves a heavily low-income customer base that is already facing high levels of energy insecurity.⁷ Finally, PGW has engaged in high levels of capital spending on its distribution grid in recent years and forecasts that this spending will increase in the future.⁸ Given these factors, it is essential that every dollar PGW

⁴ Meeting materials available at <https://www.pgworks.com/community-impact/sustainability>.

⁵ EJA St. No. 1, Direct Testimony of Dr. Dorie K. Seavey, *Pa. P.U.C. et al. v. Philadelphia Gas Works*, Docket No. R-2025-3053112, at 7 (May 21, 2025).

⁶ *Id.* at 9.

⁷ *Id.* at 16.

⁸ *Id.* at 26-7.

invests in decarbonization goes as far as it can, and comprehensive long-term planning is the best way to do that. An ad hoc and piecemeal approach, by contrast, risks piling on unaffordable cost premiums.

The milestone targets that are built into the Low Carbon Study should be designed for consistency with the City’s long-standing commitments to clean energy and carbon neutrality. Of note, on September 26, 2019, the City Council of Philadelphia passed Resolution No. 190728, which committed that “the City of Philadelphia shall take measures to achieve a fair and equitable transition to the use of 100% clean renewable energy for electricity in municipal operations by 2030, for electricity City-wide by 2035, and for all energy (including heat and transportation) city-wide by 2050 or sooner.”⁹ The Resolution further provided that “‘Clean Renewable Energy’ includes energy derive[d] from solar, wind, and geothermal; but does not include natural gas,” and that “‘Renewable Energy’ specifically excludes energy derived from fossil fuels.”¹⁰

Resolution No. 190728 affirmed and strengthened the goals previously set by the City in Resolution No. 170706, adopted by the City Council on September 14, 2017.¹¹ Resolution No. 170706 urged the City to commit to becoming “carbon-neutral by 2050.”¹² Resolution No. 170706 also urged the City to “to stimulate the generation of secure, family-supporting, local

⁹ City of Philadelphia, *Res. No. 190728*, at 3 (Sept. 26, 2019), <https://phila.legistar.com/View.ashx?M=F&ID=7723066&GUID=F6A4036E-95FB-41D4-AAB1-2BE9AAD6BE01>.

¹⁰ *Id.* at 2.

¹¹ City of Philadelphia, *Res. No. 170706* (Sept. 14, 2017), <https://phila.legistar.com/View.ashx?M=F&ID=5285340&GUID=EC606B8E-41E4-4033-8CB2-E262820B222D>.

¹² *Id.* at 2.

jobs in the fields of energy efficiency and renewable energy with equitable access to green career pathways for inner-city workers.”¹³

In the spring of 2021, PGW and the City of Philadelphia began to work together on a Business Diversification Study (“Diversification Study”) for PGW that examined means of reducing GHG emissions, sustaining jobs and customer affordability, and piloting new business opportunities.¹⁴

On December 7, 2021, Mayor James F. Kenney wrote a letter to the chair of the Philadelphia Facilities Management Corporation delivering the final Diversification Study and requesting follow-up action. As Mayor Kenney wrote:

The Study makes clear that decarbonizing a gas utility is a complex challenge, one that has not been fully addressed by any other gas utility in the United States. However, it also makes clear that meeting the City’s carbon neutrality goal and securing the financial health of the utility requires PGW to begin taking action in the short term. Now is the time to identify and plan for PGW’s role in the clean energy transition.¹⁵

Mayor Kenney further wrote:

As the Philadelphia Facilities Management Corporation manages and operates PGW, I ask that PFMC take the lead in continuing the next steps identified during the Study, by:

- Setting mid-term (i.e., 2025 and 2030) GHG reduction goals for PGW that are consistent with achieving the City’s carbon neutrality goal by 2050
- Ensuring that PGW implements programs to achieve these goals, and that these programs contribute to creating a more equitable city by supporting rate affordability and public health
- Requiring regular updates from PGW about progress towards meeting these goals
- Reforming PFMC’s management agreement to enable PGW to pilot and scale new business opportunities that will aid in meeting these goals and diversifying PGW’s business

¹³ *Id.* at 3.

¹⁴ PGW and the City of Philadelphia, Business Diversification Study, at 3 (2021).

¹⁵ Letter of Mayor James F. Kenney to the PFMC, at 3 (Dec. 7, 2021).

- Creating a clear engagement strategy to include the concerns and desires of workers, residents, and other stakeholders in laying out a path for PGW's future¹⁶

Since then, the City has continued to work towards carbon neutrality by 2050, as reflected by its 2025 Climate Action Update.¹⁷ As this report noted, climate change represents a serious environmental justice issue for Philadelphia, as “the impacts of climate change will not be felt equally by residents across the city.”¹⁸

In the First Community Engagement Meeting, PGW indicated its support for the City's 2050 carbon neutrality goal and shared that its Low Carbon Study will “assess a variety of long-term decarbonization pathways balancing safety, affordability, reliability, and sustainability for PGW customers.”¹⁹

However, PGW did not specify whether the Low Carbon Study will evaluate pathways consistent with achieving the City's 2050 carbon neutrality goal. The Low Carbon Study should be structured around such an evaluation, as it is an essential part of meeting that goal in an affordable and cost-effective fashion. As Mayor Kenney noted back in 2021, “[n]ow is the time to identify and plan for PGW's role in the clean energy transition.”²⁰ This is all the more true in the present.

The Low Carbon Study should also include milestone targets in order to ensure alignment in planning and investments throughout the process. Consistent with and building on Mayor

¹⁶ *Id.*

¹⁷ City of Philadelphia, Office of Sustainability, *2025 Climate Action Update* (May 2025), available at www.phila.gov/media/20250613162209/Philadelphia-climate-action-update-2025.pdf.

¹⁸ *Id.* at 5.

¹⁹ PGW, Low Carbon Pathways Study Presentation Slides, at 4 (June 3, 2026), available at https://www.pgworks.com/uploads/pdfs/PGW_LowCarbonPathways_June_3_Meeting.pdf.

²⁰ Letter of Mayor James F. Kenney to the PFMC, at 3 (Dec. 7, 2021).

Kenney's request that PGW identify 2025 and 2030 GHG reduction targets, the Low Carbon Study should include GHG reduction targets for 2030, 2035, 2040, and 2045 that are consistent with the City's 2050 carbon neutrality goal. This will enable a long-term planning perspective that will best support affordable and cost-effective decarbonization.

B. Public Participation and Methodology Notes

Additionally, EJA offers a number of comments on public participation and methodological matters. To start, PGW should confirm that it will make available a draft of the Low Carbon Study for comment by the public and stakeholders for at least a 30-day period. PGW should also commit to responding to comments it receives in the final version and to including those comments as an appendix. PGW should also plan the Second Community Engagement Meeting such that it occurs at least two weeks following the circulation of the draft Low Carbon Study, which will help both PGW and stakeholders get the most value out of that meeting.

Implementing these measures will help ensure that the Low Carbon Study, which is being prepared at public expense, gets the most out of the public's dollars. While the need to scale up decarbonization activities is indeed urgent, it is vital that the knowledge and perspectives of experts and community members are fully leveraged as part of this endeavor.

The Diversification Study process provides an example. While the preparation of the Diversification Study was in process in the spring of 2021, stakeholders requested the opportunity to comment on a draft of the study before its finalization. Initially, it appeared that such an opportunity would not be provided. After additional conversation and engagement, the

City agreed to provide an opportunity to comment on the draft before the final report was prepared.

This openness to public comments on the draft led to the final report being materially strengthened as a result. Notably, the draft provided for comment did not propose any specific action to investigate networked geothermal as a low-carbon heating and cooling technology that could provide decarbonization and business diversification opportunities for PGW. However, following detailed comments on the draft providing information about this technology, the final Diversification Study highlighted networked geothermal as one of the most promising pilot opportunities that the study team recommended PGW investigate.²¹ This led, several years later, to PGW being allocated additional Operating Budget funding to perform a geothermal feasibility study that is now close to completion.

The Low Carbon Study could similarly benefit from tapping into the wealth of knowledge and expertise found among engaged stakeholders in Philadelphia. It is a distinctive strength of this City that we have such an informed and engaged community of residents that is ready, willing, and able to devote substantial time to helping make sure the final Low Carbon Study is as strong as it can be. That strength should be put to good use.

Relatedly, while the First Community Engagement Meeting included a presentation from PGW and comments from the attendees, it did not include any response from PGW to attendee comments or questions. It would be helpful for the Second Community Engagement Meeting to shift to a more interactive format and to include substantive informal dialogue between PGW and attendees. While it is certainly understandable that not all questions are possible to answer live,

²¹ City of Philadelphia and PGW, Business Diversification Study, at 63 (2021).

some additional informational exchange may be possible through informal dialogue during the meeting and providing an opportunity for that to occur would strengthen the process.

Finally, building on PGW's presentation regarding the Low Carbon Study at the First Community Engagement Meeting, EJA would like to provide a number of more technically-focused comments and resources addressing methodology and related matters. A technical appendix containing these materials is appended hereto.²²

III. Conclusion

The Energy Justice Advocates appreciate the opportunity to provide these Comments. EJA respectfully requests that PGW consider these Comments, respond to them at the Second Community Engagement Meeting, and incorporate them into its decarbonization planning. Looking forward, EJA anticipates providing further comment following the Second Community Engagement Meeting as more information regarding the Low Carbon Study is made available.

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Respectfully submitted,

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²² See Exh. A, Technical Appendix.

Counsel for the Energy Justice Advocates

Exhibit A.

Technical Appendix

1. The Low Carbon Study should fully account for the health impacts of gas leaks and combustion byproducts in each scenario, and the health benefits that would result from reduced gas use in each scenario. It should include an equity/environmental justice analysis that examines how people in different neighborhoods and people with varied socioeconomic statuses (and racial identities) are affected differently by pollution. The study should analyze:
 - a. Indoor pollution from stoves and other appliances, including [NOx](#), [benzene](#), and [nanoclusters](#)
 - b. [Outdoor pollution](#) from boilers, furnaces, and other devices that vent NOx outside (Also see [Industrial Boilers Keep Burning in Areas Exceeding Air Pollution Limits](#))
2. The Low Carbon Study should fully account for the climate impact of methane leaks all along the supply chain, including behind-the-meter leaks within buildings.
 - a. Recent GHG inventories published by PGW and the City of Philadelphia as well as the slides presented during the First Community Engagement Meeting appear to underestimate Scope 3 emissions that result from PGW's sale of natural gas. It appears that those tallies may not account for leaks that take place "behind the meter" – i.e., within customers' buildings and other facilities.
 - b. Recent studies have found that much more methane leaks from natural gas systems in US cities than is reported in official inventories. See "[Majority of US urban natural gas emissions unaccounted for in inventories](#)," published in the Proceedings of the National Academy of Sciences ("PNAS") in 2021.
 - c. The PNAS paper states that "Urban NG emissions have been reported for several cities including Boston, Indianapolis, Washington, DC, Los Angeles, New York City, and Philadelphia using top-down methods based on tower, aircraft, and remote sensing measurements (e.g., refs. 4–8). Top-down studies consistently estimate distribution and end-use NG emissions to be significantly (two to 10 times) larger than the bottom-up estimates." Figure 7 includes data specifically for Philadelphia.
 - d. The paper presents evidence that appliances and pipes within buildings contribute significantly to methane pollution from cities. See this 2021 Yale Climate Connections article, which is based on the PNAS paper: [Tiny leaks, big impacts: New research points to urban indoor methane leaks](#).
 - e. PGW could commission a survey of leaks within buildings and other facilities served by the utility. Until that type of data is available, the Low Carbon Study should acknowledge that credible studies point to the likelihood of significant pollution from behind-the-meter leaks. The reference scenario should include an estimate or range for behind-the-meter leaks, and the two decarbonization scenarios should project how much those leaks may decline.

3. The Low Carbon Study should analyze possibilities for heating buildings without gas back-up or the use of alternative “low carbon” fuels in order to achieve maximum pollution reductions. In addition, the study should fully evaluate and account for the cost savings that would be achieved by decommissioning rather than building, maintaining, and replacing gas infrastructure.
4. The Low Carbon Study should examine potential cost savings from using the triage-and-transition framework to manage the gas distribution network prior to decommissioning gas lines, rather than replacing all of PGW’s leak-prone pipes. As part of the “full electrification” scenario, the consultant should consider options for using advanced leak detection and advanced pipeline repair and rehabilitation methods in order to protect public safety while avoiding very expensive pipe replacements during the “mid-transition” period. Replacement should not be the default mitigation strategy for cast iron. Rather, PGW should consider a range of mitigations, including advanced repair and rehabilitation technologies and non-pipeline alternatives, subjected to a rigorous and transparent benefit-cost analysis.
 - a. See “[Erase and Replace: The Throwaway Culture of Fixing Old Pipes](#),” a 2026 paper by former MA DPU Chair Jamie Van Nostrand
5. The Low Carbon Study should account for potential cost declines for electrification technologies and services (as well as for generating electricity from renewable resources) that may result from economies of scale, standardization, and innovation over the next 20+ years. A few examples of sources to consider:
 - a. [Streamlining the difficult work of whole-home retrofits](#)
 - b. [US studies show 2050 cost forecasts for solar, wind and batteries far too high](#)
 - c. [Want a deal on a heat pump? Team up with your neighbors.](#)
 - d. [Is a turnaround in sight for heat pump markets?](#)
 - e. [Digging Out of Our Climate Problems](#)
6. The Low Carbon Study should examine a full range of sources and sinks for thermal energy networks (including water mains, waste water pipes, etc.) Exploring those options along with boreholes will enable the study to consider opportunities to reduce the cost of thermal energy networks significantly.
 - a. “[How to Get a Head Start on a Thermal Energy Network](#)”
 - b. “[Boston eyes water-based thermal network to ease grid strain](#)”
 - c. [Denver has a plan to heat and cool buildings without fossil fuels. It involves ... sewage?](#)
 - d. [The Secret to Low Cost, Low Carbon Home Heating? Your Water Pipes](#)

7. The Low Carbon Study should examine how distributed energy resources (rooftop solar, battery storage, flexible demand, and virtual power plants) can lower the cost of electricity needed to power heat pumps.
 - a. The cost of electricity is a key planning factor, but that cost will not be determined solely by outside forces. The study should explore how the City of Philadelphia, PGW, and the Commonwealth of Pennsylvania can take action to reduce electricity costs (including through energy efficiency) via policy changes, planning, and public investment.
 - b. Costs can be driven by demand peaks, but with technological developments (particularly in batteries) and regulatory developments (e.g., DER aggregation), the cost landscape is rapidly changing and will continue to do so over the time horizon of this study.
 - c. In the coming years, the cost of electrification can also be reduced by enhancing PECO's residential heating tariff for electricity customers.
8. The Low Carbon Study should consider how energy transition investments that prioritize low-income ratepayers can be fully integrated with comprehensive home repairs, weatherization, and energy efficiency upgrades, and fully account for the health, economic, and resiliency benefits of those building upgrades.
 - a. It is important to examine how standardization and economies of scale could reduce the cost of building upgrades and how efficiency investments can cut energy demand.
 - b. The Low Carbon Study should include an equity analysis that examines how these investments can be designed to provide the greatest possible benefit to low-income residents who currently suffer most from home disrepair, inadequate heating or cooling, and unaffordable energy bills.
9. The Low Carbon Study should account for the financial and health benefits that result from providing more affordable cooling to Philadelphia residents through investment in heat pumps and weatherization. Efficient and affordable cooling will become increasingly important to residents as average summer temperatures increase and as heat waves grow more frequent and intense.