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June 4, 2008

**VIA FACSIMILE AND  
FEDERAL EXPRESS**

Ms. Joan T. Decker  
Records Commissioner  
City Hall, Room 158  
Philadelphia, PA 19107

**RE: In the Matter of the Philadelphia Water Department's Proposed Increase in Rates for Water and Wastewater Utility Services - FY 2009-2012**

Dear Commissioner Decker:

Enclosed for filing are the original and one (1) copy of the Notice of Intent to Participate by the Philadelphia Large Users Group ("PLUG") in the above-referenced proceeding.

As indicated on the attached Certificate of Service, all the parties to the proceeding have been served. Please date stamp the extra copy of this transmittal letter and kindly return it for our filing purposes in the enclosed self-addressed stamped envelope. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 

Charis Mincavage  
Shelby A. Linton-Keddie

Counsel to Philadelphia Large Users Group

SLK

c: Harris T. Bock, Esq. (via Facsimile and Federal Express)  
Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below.

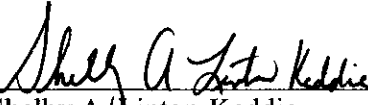
**VIA E-MAIL AND FEDERAL EXPRESS**

Philip A. Bertocci, Esq.  
Thu B. Tran, Esq.  
Community Legal Services  
1424 Chestnut Street  
Philadelphia, PA 19102

Andre Dasent, Esq.  
1650 Market Street, 36<sup>th</sup> Floor  
Philadelphia, PA 19103

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17 N. Second Street, 18<sup>th</sup> Floor  
Harrisburg, PA 17101

Christine Knapp  
Eastern Pennsylvania Outreach Coordinator  
Citizens for Pennsylvania's Future (PennFuture)  
1518 Walnut Street Suite 1100  
Philadelphia, PA 19102

  
\_\_\_\_\_  
Shelby A. Linton-Keddie

Dated this 4<sup>th</sup> day of June, 2008, in Harrisburg, Pennsylvania.

**BEFORE THE  
CITY OF PHILADELPHIA WATER DEPARTMENT**

**NOTICE OF INTENT TO PARTICIPATE IN THE MATTER OF PHILADELPHIA  
WATER DEPARTMENT'S PROPOSED INCREASE FOR RATES FOR WATER AND  
WASTEWATER UTILITY SERVICES – FY 2009-2012**

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., & Shelby A. Linton-Keddie, Esq. of  
McNees Wallace & Nurick LLC.

3. Address: 100 Pine Street

4. Phone: (717) 232-8000

City: Harrisburg

State: PA

Zip: 17108

Fax: (717) 260-1763

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.

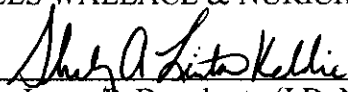
6. Issues of Interest:

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 and wastewater service and quantity charges and whether such increases are just, reasonable, and nondiscriminatory. In addition, PLUG is interested in PWD's proposal to collect stormwater charges based on a customer's Gross and Impervious Areas. This issue is of special interest to PLUG since, until this filing, PWD has charged for stormwater based on meter size. PLUG would like to examine this proposed change in further detail to determine the effects of this methodology on PLUG members and evaluate whether a different pricing strategy is more equitable. PLUG also reserves the right to address additional issues that may arise during this proceeding.

7. PLUG anticipates being an active party participating in technical hearings.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By   
James P. Dougherty (I.D. No. 59454)  
Charis Mincavage (I.D. No. 82039)  
Shelby A. Linton-Keddie (I.D. No. 206425)  
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Fax: (717) 260-0763

Counsel to Philadelphia Large Users Group

Dated: June 4, 2008

**PHILADELPHIA LARGE USERS GROUP**

Albert Einstein Healthcare Network

Frankford Hospitals, Inc.

Magee Rehab

Newman & Company, Inc.

Philadelphia College of Osteopathic Medicine

Temple University

Thomas Jefferson University

Thomas Jefferson University Hospitals, Inc.

**APPENDIX A**