#### **COMMONWEALTH OF PENNSYLVANIA**



## OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560

FAX (717) 783-7152 consumer@paoca.org

May 21, 2018

Michael W. Gang, Esquire Anthony D. Kanagy, Esquire Post & Schell, PC 17 North Second Street 12<sup>th</sup> Floor Harrisburg, PA 17101

Re:

Pa. Public Utility Commission

V.

Duquesne Light Company – Base Rate

Docket No. R-2018-3000124

## Dear Counsel:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set VIII, in the above-referenced proceeding.

In accordance with the discovery modifications adopted during the May 3, 2018 Prehearing Conference in this proceeding, we request that the Company provide verified answers to these inquiries within ten (10) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

David Habr Habr Economics 213 Cornuta Way Nipomo, CA 93444-5020 david.habr@habreconomics.com Michael W. Gang, Esquire Anthony D. Kanagy, Esquire May 21, 2018 Page 2

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely.

Phillip D. Demanchick Assistant Consumer Advocate

PA Attorney I.D. # 324761

E-Mail: PDemanchick@paoca.org

## Enclosures:

cc:

PUC Secretary Chiavetta, (Letter and Certificate of Service only)

Certificate of Service

\*249868

#### CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission

Docket No. R-2018-3000124

Duquesne Light Company – Base Rate

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Duquesne Light Company, Set VIII, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 21st day of May 2018.

# SERVICE BY E-MAIL & INTER-OFFICE MAIL

Gina L. Miller, Esquire John M. Coogan, Esquire Bureau of Investigation and Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120

## SERVICE BY E-MAIL

Joseph Otis Minott, Esquire Ernest Logan Welde, Esquire Clean Air Council 135 South 19th Street Suite 300 Philadelphia, PA 19103

# SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

David T. Fisfis, Esquire Tishekia E. Williams, Esquire Michael Zimmerman, Esquire Duquesne Light Company 411 Seventh Avenue 16<sup>th</sup> Floor

Pittsburgh, PA 15219

Sharon E. Webb, Esquire Office of Small Business Advocate 300 North Second Street Suite 202 Harrisburg, PA 17101

Joseph L. Vullo, Esquire Burke, Vullo, Reilly, Roberts 1460 Wyoming Avenue Forty Fort, PA 18704

Michael W. Gang, Esquire Anthony D. Kanagy, Esquire

Post & Schell, PC 17 North Second Street

12<sup>th</sup> Floor

Harrisburg, PA 17101

Emily M. Farah, Esquire Duquesne Light Company 411 Seventh Avenue Mail Drop 15-7 Pittsburgh, PA 15219

William H. Roberts II, Esquire PNG Companies, LLC 375 North Shore Drive Pittsburgh, PA 15212

Patrick M. Cicero, Esquire Kadeem Morris, Esquire Elizabeth R. Marx, Esquire Pennsylvania Utility Law Project CAUSE-PA 118 Locust Street Harrisburg, PA 17101

Derrick Price Williamson, Esquire Barry A. Naum, Esquire Spilman, Thomas, & Battle, PLLC 1100 Bent Creek Boulevard Suite 101 Mechanicsburg, PA 17050

Pamela C. Polacek, Esquire Matthew L. Garber, Esquire McNees, Wallace, & Nurick, LLC 100 Pine Street Harrisburg, PA 17101

Scott J. Rubin, Esquire 333 Oak Lane Bloomsburg, PA 17815 David P. Zambito, Esquire Jonathan P. Nase, Esquire Cozen O' Connor 17 North Second Street Suite 1410 Harrisburg, PA 17101

Anthony C. Decusatis, Esquire Morgan, Lewis, & Bockius, LLP 1701 Market Street Philadelphia, PA 19103

Mark C. Szybist, Esquire National Resources Defense Council 1152 South 15<sup>th</sup> Street NW Suite 300 Washington, D.C. 20005

# SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

Jason Dolby 409 Anawanda Avenue Pittsburgh, PA 15228 James Fedell 2009 Forge Drive Aliquippa, PA 15001

/s/ Phillip D. Demanchick
Phillip D. Demanchick
Assistant Consumer Advocate
PA Attorney I.D. # 324761
E-Mail: PDemanchick@paoca.org

David T. Evrard Assistant Consumer Advocate PA Attorney I.D. # 33870 E-Mail: DEvrard@paoca.org

Aron J. Beatty Senior Assistant Consumer Advocate PA Attorney I.D. # 86625 E-Mail: <u>ABeatty@paoca.org</u> \*249551 Counsel for Office of Consumer Advocate 555 Walnut Street 5<sup>th</sup> Floor, Forum Place Harrisburg, PA 17101-1923 Phone: (717) 783-5048 Fax: (717) 783-7152

Fax: (717) 783-7152 Dated: May 21, 2018