



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

May 10, 2021

**Via Electronic Mail**

Michael W. Gang, Esq.  
Anthony D. Kanagy, Esq.  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601

Tishekia E. Williams, Esq.  
Michael Zimmerman, Esq.  
Emily Farah, Esq.  
Duquesne Light Company  
411 Seventh Avenue, 16<sup>th</sup> Floor  
Pittsburgh, PA 15219

Re: Pennsylvania Public Utility Commission v.  
Duquesne Light Company  
Docket No.: R-2021-3024750  
**I&E Data Requests**

Dear Counsel:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Data Requests I&E-RB-29-D through I&E-RB-40-D – Kubas** for the above referenced proceeding. *Please withdraw the Data Requests I&E-RB-29-D through I&E-RB-39-D – Kubas that were served on Friday, May 7, 2021 and replace with this corrected set.*

Please restate each Data Request before responding and start each Data Request and response on a separate page. The responses should identify the responding person(s).

The responses to these Data Requests are due within fifteen (15) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please provide your responses to me via email at the email address listed below.

Copies are being served on parties of record per the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic service.* Should you have any questions, please do not hesitate to contact me.

Sincerely,

Scott B. Granger  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 63641  
(717) 425-7593  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only – via e-file*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No.: R-2021-3024750
	:	
Duquesne Light Company	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Data Requests** dated May 10, 2021, in the manner and upon the persons listed below:

**Served via Electronic Mail Only**

Michael W. Gang, Esq.  
Anthony D. Kanagy, Esq.  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[mgang@postschell.com](mailto:mgang@postschell.com)  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
*Counsel for Duquesne Light Company*

Tishekia E. Williams, Esq.  
Michael Zimmerman, Esq.  
Emily Farah, Esq.  
Duquesne Light Company  
411 Seventh Avenue, 16<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[twilliams@duqlight.com](mailto:twilliams@duqlight.com)  
[mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)  
[efarah@duqlight.com](mailto:efarah@duqlight.com)  
*Counsel for Duquesne Light Company*

Sharon E. Webb, Esq.  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1<sup>st</sup> Floor  
Harrisburg, PA 17101-1923  
[swebb@pa.gov](mailto:swebb@pa.gov)

Christy M. Appleby, Esq.  
Phillip D. Demanchick, Esq.  
David T. Evrard, Esq.  
Aron J. Beatty, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[pdemanchick@paoca.org](mailto:pdemanchick@paoca.org)  
[devrard@paoca.org](mailto:devrard@paoca.org)  
[abeatty@paoca.org](mailto:abeatty@paoca.org)

Scott J. Rubin, Esq.  
Public Utility Consulting  
333 Oak Lane  
Bloomsburg, PA 17815  
[scott.j.rubin@gmail.com](mailto:scott.j.rubin@gmail.com)  
*Counsel for International Brotherhood of  
Electrical Workers, Local 29*

Ria M. Pereira, Esq.  
Elizabeth R. Marx, Esq.  
John W. Sweet, Esq.  
Lauren N. Berman, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101-1414  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)  
*Counsel for CAUSE-PA*

Joseph L. Vullo, Esq.  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Counsel for CAAP*

William H. Roberts, II, Esq.  
PNG Companies, LLC  
375 North Shore Drive  
Pittsburgh, PA 15212  
[william.h.robertsII@peoples-gas.com](mailto:william.h.robertsII@peoples-gas.com)  
*Counsel for  
Peoples Natural Gas Company, LLC*

Mark C. Szybist, Esq.  
Natural Resources Defense Council  
1152 15<sup>th</sup> Street NW, Suite 300  
Washington, DC 20005  
[mszybist@nrdc.org](mailto:mszybist@nrdc.org)  
*Counsel for NRDC*

Derrick Price Williamson, Esq.  
Barry A. Naum, Esq.  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)  
*Counsel for Wal-Mart Stores East, LP  
and Sam's East, Inc.*

Sarah Stoner, Esq.  
Daniel Clearfield, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA  
[sstoner@eckertseamans.com](mailto:sstoner@eckertseamans.com)  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
*Counsel for KEEA*

Matthew F. Smith, Esq.  
Cozen O'Connor  
One Oxford Centre  
301 Grant Street, 26<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[mfsmith@cozen.com](mailto:mfsmith@cozen.com)  
*Counsel for NRGP*

Joseph Otis Minott, Esq.  
Logan Welde, Esq.  
Clean Air Council  
135 S. 19<sup>th</sup> Street, Suite 300  
Philadelphia, PA 19103  
[joe\\_minott@cleanair.org](mailto:joe_minott@cleanair.org)  
[lwelde@cleanair.org](mailto:lwelde@cleanair.org)  
*Counsel for Clean Air Council*

Emily Collins, Esq.  
Fair Shake Environmental Legal Services  
3495 Butler Street, Suite 102  
Pittsburgh, PA 15201  
[ecollins@fairshake-els.org](mailto:ecollins@fairshake-els.org)  
*Counsel for NRDC*

Brian Kalcic  
Excel Consulting  
225 S. Meramec Avenue, Suite 720-T  
St. Louis, MO 63105  
[excel.consulting@sbcglobal.net](mailto:excel.consulting@sbcglobal.net)  
*Consultant for OSBA*



Scott B. Granger  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 63641