



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

May 6, 2021

Via Electronic Mail

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

Tishekia E. Williams, Esq.
Michael Zimmerman, Esq.
Emily Farah, Esq.
Duquesne Light Company
411 Seventh Avenue, 16th 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-RE-32-D through I&E-RE-40-D – Keller** for the above referenced proceeding. 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

SBG/ac
Enclosures

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 6, 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, 12th Floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
Counsel for Duquesne Light Company

Tishekia E. Williams, Esq.
Michael Zimmerman, Esq.
Emily Farah, Esq.
Duquesne Light Company
411 Seventh Avenue, 16th Floor
Pittsburgh, PA 15219
twilliams@duqlight.com
mzimmerman@duqlight.com
efarah@duqlight.com
Counsel for Duquesne Light Company

Sharon E. Webb, Esq.
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101-1923
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, 5th Floor
Harrisburg, PA 17101-1923
cappleby@paoca.org
pdemanchick@paoca.org
devrard@paoca.org
abeatty@paoca.org

Scott J. Rubin, Esq.
Public Utility Consulting
333 Oak Lane
Bloomsburg, PA 17815
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
Counsel for CAUSE-PA

Joseph L. Vullo, Esq.
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
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
*Counsel for
Peoples Natural Gas Company, LLC*

Mark C. Szybist, Esq.
Natural Resources Defense Council
1152 15th Street NW, Suite 300
Washington, DC 20005
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
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, 8th Floor
Harrisburg, PA
sstoner@eckertseamans.com
dclearfield@eckertseamans.com
Counsel for KEEA

Matthew F. Smith, Esq.
Cozen O'Connor
One Oxford Centre
301 Grant Street, 26th Floor
Pittsburgh, PA 15219
mfsmith@cozen.com
Counsel for NRG

Joseph Otis Minott, Esq.
Logan Welde, Esq.
Clean Air Council
135 S. 19th Street, Suite 300
Philadelphia, PA 19103
joe_minott@cleanair.org
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
Counsel for NRDC

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue, Suite 720-T
St. Louis, MO 63105
excel.consulting@sbcglobal.net
Consultant for OSBA



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