### **COMMONWEALTH OF PENNSYLVANIA**



#### OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560 pa\_oca
f /pennoca

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

May 27, 2021

Via Electronic Mail Only

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

Re: Pennsylvania Public Utility Commission

V.

Duquesne Light Company Docket No. R-2021-3024750

### Dear Counsel:

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

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) 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 consultants, as listed below:

Roger D. Colton Fisher, Sheehan, & Colton 34 Warwick Road Belmont, MA 02478

E-Mail: OCADuquesne2021@paoca.org

David J. Garrett
Resolve Utility Consulting
101 Park Avenue, Suite 1125
Oklahoma City, OK 73102
E-Mail: OCADuquesne2021@paoca.org

Michael W. Gang, Esquire Anthony D. Kanagy, Esquire May 27, 2021 Page 2

> Ron Nelson Strategen Consulting, LLC 2150 Allston Way, Suite 400 Berkeley, CA 94704 E-Mail: OCADuquesne2021@paoca.org

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,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org

## **Enclosures:**

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

\*309844

### CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission

.

v. : Docket No. R-2021-3024750

•

Duquesne Light Company

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 II, Set III, and Set IV, 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 27<sup>th</sup> day of May 2021.

# SERVICE BY E-MAIL ONLY

Scott B. Granger, Esquire Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2<sup>nd</sup> Floor Harrisburg, PA 17120

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

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

Ria M. Pereira, Esquire Elizabeth R. Marx, Esquire John W. Sweet, Esquire Lauren N. Berman, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 Sharon E. Webb, Esquire Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17109-1923

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

Andrew J. Karas, Esquire Sophia Al Rasheed, Esquire Fair Shake Environmental Legal Services 600 Superior Avenue East Cleveland, OH 44114

Derrick Price Williamson, Esquire Barry A. Naum, Esquire Spilman Thomas & Battle, PLLC 1100 Bent Creek Boulevard Suite 101 Mechanicsburg, PA 17050 Joseph L. Vullo, Esquire PA Weatherization Providers Task Force, Inc. 1460 Wyoming Avenue Forty Fort, PA 18704

Karen O. Moury, Esquire Eckert Seamans Cherin & Mellott, LLC 213 Market Street 8<sup>th</sup> Floor Harrisburg, PA 17101

John F. Povilaitis, Esquire Alan M. Seltzer, Esquire Buchanan Ingersoll & Rooney PC 409 North Second Street, Suite 500 Harrisburg, PA 17101 Michael Turzai, Esquire William Roberts II, Esquire Peoples Natural Gas Company LLC 375 North Shore Drive Pittsburgh, PA 15212

Lauren M. Burge, Esquire Eckert Seamans Cherin & Mellott, LLC 600 Grant Street 44<sup>th</sup> Floor Pittsburgh, PA 15219

/s/ Christy M. Appleby Christy M. Appleby Assistant Consumer Advocate PA Attorney I.D. # 85824

E-Mail: <u>CAppleby@paoca.org</u>

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

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 Dated: May 27, 2021

\*309700

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

Aron J. Beatty Senior Assistant Consumer Advocate PA Attorney I.D. # 86625 E-Mail: ABeatty@paoca.org