



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

July 12, 2021

Via Electronic Mail

Michael Zimmerman, Esq.
Duquesne Light Company
411 Seventh Avenue
Mail Drop 15-7
Pittsburgh, PA 15219
mzimmerman@duqlight.com

Re: Pennsylvania Public Utility Commission v.
Duquesne Light Company
Docket No. R-2021-3024750
I&E Response to DLC Interrogatory – Set I

Dear Counsel:

Enclosed please find the following Response of the Bureau of Investigation and Enforcement (I&E) to the Interrogatory of Duquesne Light Company:

I&E Response to Duquesne Light Company Set I (no. 14) – Cline

Copies are being served on parties 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,

A handwritten signature in black ink that reads 'Scott B. Granger'.

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

SBG/ac
Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter & Cert 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 **Interrogatory Response** dated July 12, 2021, in the manner and upon the persons listed below:

Served via Electronic Mail Only

James Davis
Tishekia E. Williams, Esq.
Michael Zimmerman, Esq.
Emily Farah, Esq.
Duquesne Light Company
411 Seventh Avenue, 16th Floor
Pittsburgh, PA 15219
jdavis4@duqlight.com
twilliams@duqlight.com
mzimmerman@duqlight.com
efarah@duqlight.com
Counsel for Duquesne Light Company

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

Sharon E. Webb, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov

Christy M. Appleby, Esq.
Phillip D. Demanchick, Esq.
David T. Evrard, Esq.
Aron J. Beatty, Esq.
Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
cappleby@paoca.org
pdemanchick@paoca.org
devrard@paoca.org
abeatty@paoca.org

Ria M. Pereira, Esq.
Elizabeth R. Marx, Esq.
John 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 Pennsylvania
Weatherization Providers Task Force*

Mark C. Szybist, Esq.
Natural Resources Defense Council
1152 15th Street NW, Suite 300
Washington, DC 20005
mszybist@nrdc.org
Counsel for NRDC

Andrew J. Karas, Esq.
Sophia Al Rasheed, Esq.
Fair Shake Environmental Legal Services
600 Superior Environmental Legal Services
600 Superior Avenue East
Cleveland, OH 44114
akaras@fairshake-els.org
salrasheed@fairshake-els.org
Counsel for NRDC

Karen O. Moury, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
kmoury@eckertseamans.com
*Counsel for
Peoples Natural Gas Company LLC*

Lauren M. Burge, Esq.
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
*Counsel for
Peoples Natural Gas Company LLC*

Michael Turzai, Esq.
General Counsel and Vice President
Peoples Natural Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
michael.turzai@peoples-gas.com
*Counsel for
Peoples Natural Gas Company LLC*

William H. Roberts II, Esq.
Senior Counsel
Peoples Natural Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
william.h.robertsII@peoples-gas.com
*Counsel for
Peoples Natural Gas Company LLC*

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
United States Steel Corporation

John F. Povilaitis, Esq.
Alan M. Seltzer, Esq.
Buchanan Ingersoll & Rooney PC
409 North Second Street, Suite 500
Harrisburg, PA 17101
john.povilaitis@bipc.com
alan.seltzer@bipc.com
Counsel for
Nationwide Energy Partners LLC

Scott F. Dunbar, Esq.
Keyes & Fox LLP
1580 Lincoln Street, Suite 1105
Denver, CO 80203
sdunbar@keyesfox.com
Counsel for ChargePoint, Inc.

James J. Van Nostrand, Esq.
Keyes & Fox LLP
275 Orchard Drive
Pittsburgh, PA 15228
jvannostrand@keyesfox.com
Counsel for ChargePoint, Inc.

Robert A. Eberle, Esq.
Amanda B. Bundick, Esq.
Eberle & Bundick, LLC
P.O. Box 44290
Pittsburgh, PA 15205
bob@eblaborlaw.com
amanda@eblaborlaw.com
Counsel for IBEW Local 29

Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
rdk@indecon.com
Witness for OSBA

Glenn A. Watkins
Technical Associates, Inc.
6377 Mattawan Trail
P.O. Box 1690
Mechanicsville, VA 23116
ocaduquesne2021@paoca.org
Witness for OCA

Lafayette K. Morgan, Jr.
Exeter Associates, Inc.
10480 Little Patuxent Parkway, Suite 300
Columbia, MD 21044
ocaduquesne2021@paoca.org
Witness for OCA

David Garrett
Resolve Utility Consulting, PLLC
101 Park Avenue, Suite 1125
Oklahoma City, OK 73102
ocaduquesne2021@paoca.org
Witness for OCA

Ron Nelson
Strategen Consulting, LLC
2150 Allston Way, Suite 400
Berkeley, CA 94704
ocadupesne2021@paoca.org
Witness for OCA

Roger Colton
Fisher, Sheehan & Colton
34 Warwick Road
Belmont, MA 02478
ocadupesne2021@paoca.org
Witness for OCA

Noah Eastman
Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
ocadupesne2021@paoca.org
Witness for OCA

Jan Vroman
623 Eastman Street
West Mifflin, PA 15122
jan.vroman@yahoo.com
Complainant



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