



February 28, 2019

**VIA E-MAIL AND FIRST CLASS MAIL**

**Jonathan P. Nase**

Direct Phone 717-773-4191  
Direct Fax 215-372-2340  
jnase@cozen.com

Carrie B. Wright, Esq.  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for all of the Authority and the Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC and Peoples Gas Company LLC by Way of the Purchase of All of LDC Funding LLC's Membership Interests by Aqua America, Inc.; Docket Nos. A-2018-3006061 et al.**

**Answers of Peoples Natural Gas Company LLC and Peoples Gas Company LLC to Interrogatories 55-59 by the Bureau of Investigation and Enforcement**

Dear Ms. Wright:

Enclosed please find the Answers of Peoples Natural Gas Company LLC and Peoples Gas Company LLC to the above-referenced discovery. Confidential Attachments will be mailed to those parties that have executed Non-Disclosure Certificates. Copies have been served in accordance with the enclosed certificate of service.

Please contact me if you have any questions concerning the enclosed.

Sincerely,

COZEN O'CONNOR

By: Jonathan P. Nase

JPN  
Enclosures

cc: Rosemary Chiavetta (cover letter and certificate of service only)  
Per Certificate of Service  
Lynda Petrichevich  
William H. Roberts, II, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Aqua America, Inc., Aqua :  
Pennsylvania, Inc., Aqua Pennsylvania Wastewater, :  
Inc., Peoples Natural Gas Company LLC and : Docket No. A-2018-3006061  
Peoples Gas Company LLC for all of the Authority : A-2018-3006062  
and the Necessary Certificates of Public : A-2018-3006063  
Convenience to Approve a Change in Control of :  
Peoples Natural Gas Company LLC and Peoples :  
Gas Company LLC by Way of the Purchase of All of :  
LDC Funding LLC's Membership Interests by Aqua :  
America, Inc. :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing **Answer of Peoples Natural Gas Company LLC and Peoples Gas Company LLC to Interrogatories 55-59 Propounded by the Bureau of Investigation and Enforcement**, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA E-MAIL AND FIRST CLASS MAIL**

Carrie B. Wright, Esq.  
Erika L. McLain, Esq.  
Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement  
400 North Street, 2 West  
Harrisburg, PA 17120  
E-mail: carwright@pa.gov  
E-mail: ermclain@pa.gov  
Counsel for *Bureau of Investigation & Enforcement*

Erin K. Fure, Esq.  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101  
E-mail: efure@pa.gov  
Counsel for *Office of Small Business Advocate*

J. D. Moore, Esq.  
Christine Maloni Hoover, Esq.  
Darryl A. Lawrence, Esq.  
Harrison W. Breitman, Esq.  
Office of Consumer Advocate  
555 Walnut Street 5th Floor  
Forum Place  
Harrisburg, PA 17101  
E-mail: AquaPeoples@paoca.org  
Counsel for *Office of Consumer Advocate*

Michael W. Hassell, Esq.  
Michael W. Gang, Esq.  
Garrett P. Lent, Esq.  
Post & Schell, P.C.  
17 N. 2nd St., 12th Floor  
Harrisburg, PA 17101  
E-mail: mhassell@postschell.com  
E-mail: mgang@postschell.com  
E-mail: glent@postschell.com  
Counsel for *Aqua Pennsylvania Inc.*

Kimberly A. Joyce, Esq.  
Alexander R. Stahl, Esq.  
Aqua America, Inc.  
762 West Lancaster Ave.  
Bryn Mawr, PA 19010  
E-mail: kajoyce@aquaamerica.com  
E-mail: astahl@aquaamerica.com  
Counsel for *Aqua Pennsylvania Inc.*

William H. Roberts II, Esq.  
Peoples Natural Gas Company LLC  
375 North Shore Drive  
Pittsburgh, PA 15212  
E-mail: William.h.robertsii@peoples-gas.com  
Counsel for *Peoples Natural Gas Company LLC* and *Peoples Gas Company LLC*

Kevin J. Moody, Esq.  
Pennsylvania Independent Oil  
& Gas Association  
212 Locust St., Suite 300  
Harrisburg, PA 17101-1510  
E-mail: kevin@pioga.org  
Counsel for *PIOGA*

Tanya C. Leshko, Esq.  
Alan M. Seltzer, Esq.  
BUCHANAN INGERSOLL & ROONEY PC  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101-1357  
E-mail: alan.seltzer@bipc.com  
Email: tanya.leshko@bipc.com

Matthew Eggerding, Esq.  
2200 Energy Drive  
Canonsburg, PA 15317  
E-mail: meggerding@equitransmidstream.com  
Counsel for *Equitrans, L.P.*

Brian Petruska, Esq.  
General Counsel  
LiUNA, Mid-Atlantic Region  
11951 Freedom Drive, Suite 310  
Reston, VA 20190  
E-mail: bpetruska@maliuna.org  
Counsel for *Laborers' International Union*

Melvin L. Vatz, Esq.  
Vatz Law  
247 Fort Pitt Boulevard, 4th Floor  
Pittsburgh, PA 15222  
E-mail: mvatz@vatzlaw.com  
Counsel for *Laborers' District Council of Western Pennsylvania*

Scott J. Rubin, Esq.  
333 Oak Lane  
Bloomsburg, PA 17815  
E-mail: Scott.j.rubin@gmail.com  
Counsel for *Utility Workers Union of America, Local 612*

David T. Fisfis, Esq.  
Tishekia E. Williams, Esq.  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219  
E-mail: dfisfis@duqlight.com  
E-mail: twilliams@duqlight.com  
Counsel for *Duquesne Light Company*

Michael A. Gruin, Esq.  
Stevens & Lee  
17 North Second Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101  
E-mail: mag@stevenslee.com  
Counsel for *Duquesne Light Company*

Linda R. Evers, Esq.  
Stevens & Lee  
111 N. 6th Street  
Reading, PA 19601  
lre@stevenslee.com  
Counsel for *Duquesne Light Company*

Elizabeth R. Marx, Esq.  
Kadeem G. Morris, Esq.  
Patrick M. Cicero, Esq.  
John W. Sweet, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
E-mail: pulp@palegalaid.net  
Counsel for *CAUSE-PA*

Todd S. Stewart, Esq.  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
E-mail: tsstewart@hmslegal.com  
Counsel for *Natural Gas Supplier Parties and  
The Retail Energy Supply Association*

Daniel Clearfield, Esq.  
Deanne M. O'Dell, Esq.  
Kristine Marsilio, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
Dclearfield@eckertseamans.com  
dodell@eckertseamans.com  
kmarsilio@eckertseamans.com  
Counsel for *Direct Energy Business  
Marketing, LLC* and *Direct Energy Small  
Business, LLC*

**VIA E-MAIL ONLY (Consultants)**

James L. Crist, Consultant  
Lumen Group, Inc.  
4226 Yarmouth Drive, Suite 101  
Allison Park, PA 15101  
E-mail: JLCrist@aol.com  
Expert Witness for *Natural Gas Supplier  
Parties and The Retail Energy Supply  
Association*

Ralph Smith, Consultant  
Larkin & Associates  
15728 Farmington Road  
Livonia, MI 48154  
E-mail: RSmithLA@aol.com  
Consultant for *Office of Consumer Advocate*

Barbara R. Alexander  
83 Wedgewood Drive  
Winthrop, ME 04364  
E-mail: barbalex@ctel.net  
Consultant for *Office of Consumer Advocate*

**VIA MAIL ONLY**

Matthew Kahal  
1108 Pheasant Xing  
Charlottesville, VA 22901  
Consultant for *Office of Consumer Advocate*



Jonathan P. Nase, Esq.  
Counsel for *Peoples Natural Gas Company  
LLC* and *Peoples Gas Company LLC*

Date: February 28, 2019