### **COMMONWEALTH OF PENNSYLVANIA**



## OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560

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

March 13, 2019

Michael W. Gang, Esquire Anthony D. Kanagy, Esquire Devin T. Ryan, Esquire Post & Schell PC 17 North Second Street, 12<sup>th</sup> Floor Harrisburg, PA 17101

Re:

Pennsylvania Public Utility Commission

V.

Peoples Natural Gas Company LLC

Docket No. R-2018-3006818

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, 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 consultant, as listed below:

Glenn Watkins
Technical Associates, Inc.
1503 Santa Rosa Road
Suite 130
Richmond, VA. 23229
watkinsg@tai-econ.com

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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).

Respectfully submitted,

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

# Enclosures

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

Certificate of Service

\*267570

### CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission

v. : Docket No. R-2018-3006818

Peoples Natural Gas Company LLC :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Interrogatories 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 13th day of March 2019

## SERVICE BY E-MAIL & INTER-OFFICE MAIL

Erika L. McLain, Esquire Carrie B. Wright, Esquire Bureau of Investigation & Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120

### SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

Michael W. Gang, Esquire Anthony D. Kanagy, Esquire Devin T. Ryan, Esquire Post & Schell PC 17 North Second Street, 12<sup>th</sup> Floor Harrisburg, PA 17101 (Counsel for Peoples)

William H. Roberts II, Esquire Andrew Watcher Peoples Natural Gas Company LLC 375 North Shore Drive Pittsburgh, PA 15212

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## VIA FIRST CLASS MAIL

Michael J. Healey, Esquire Healey Block & Hornack, P.C. 247 Fort Pitt Boulevard, 4th Floor Pittsburgh, PA 15222 (United Steelworkers)

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# /s/Christy M. Appleby\_

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## Counsel for:

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