March 19, 2019



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

VIA E-MAIL AND FIRST CLASS MAIL

Scott J. Rubin, Esq. 333 Oak Lane, Bloomsburg, PA 17815

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 and Requests for Production of Documents Set II Propounded by the Utility Workers Union of America, Local 612

Dear Mr. Rubin:

Enclosed please find the Answers of Peoples Natural Gas Company LLC and Peoples Gas Company LLC to the above-referenced discovery. Copies have been served in accordance with the enclosed certificate of service.

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

Sincerely,

Bv:

COZEN O'CONNOR

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 : 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 No. A-2018-3006061 A-2018-3006062 A-2018-3006063

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Answers of Peoples Natural Gas Company LLC and Peoples Gas Company LLC to Interrogatories and Requests for Production of Documents Set II Propounded by the Utility Workers Union of America, Local 612, 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: ngang@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 Counsel for *Equitrans, L.P.*

Matthew Eggerding, Esq. Equitrans Midstream Corp. 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 Unions

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, 16th 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 Ire@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, 8th Floor Harrisburg, PA 17101 E-mail: Dclearfield@eckertseamans.com E-mail: dodell@eckertseamans.com E-mail: 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

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

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

Roger D. Colton Fisher, Sheehan & Colton 34 Warwick Road Belmont, MA 08478 roger@fsconline.com Consultant for *Office of Consumer Advocate* Robert D. Knecht, Consultant Industrial Economics, Inc. 2067 Massachusetts Avenue Cambridge, MA 02140 rdk@indecon.com Consultant for Office of Small Business Advocate

Brian Kalcic Excel Consulting Suite 720T 225 South Meramec Avenue St. Louis, MO 63105 excel.consulting@sbcglobal.net Consultant for *Office of Small Business Advocate*

VIA MAIL ONLY (No E-Mail Address Provided)

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

Clifford W. Baker, Senior Vice President John M. Quinn, Vice President - Rates P. Robert Pichardo, III, Esq. Equitrans Midstream Corp. 2200 Energy Drive Canonsburg, PA 15317 Representing *Equitrans Midstream Corp.* Orlando Magnani Rand Energy Consultants, LLC 19561 Caladesi Drive Estero, FL 33967 Consultant for *Direct Energy*

P. Nas

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

Date: March 19, 2019