

May 2, 2019

Direct Phone 717-703-5892 Direct Fax 215-989-4216 dzambito@cozen.com

VIA E-MAIL AND FIRST CLASS MAIL

Michael A. Gruin, Esquire Stevens & Lee 17 North Second Street 16th Floor Harrisburg, PA 17101

Re: Pennsylvania Public Utility Commission v. Peoples Natural Gas Company LLC; Docket No. R-2018-3006818 (2019 Base Rate Case Filing)

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY PEOPLES NATURAL GAS COMPANY LLC AND DIRECTED TO DUQUESNE LIGHT COMPANY - SET I

Dear Mr. Gruin:

Enclosed please find the above-referenced Interrogatories and Requests for Production of Documents of Peoples Natural Gas Company LLC directed to Duquesne Light Company. Copies have been served in accordance with the enclosed certificate of service.

Please feel free to contact me should you have any questions concerning the enclosed.

Sincerely,

COZEN O'CONNOR amth David P. Zambito Bv:

DPZ/kmg Enclosure

cc: Rosemary Chiavetta, Secretary (*Letter and Certificate of Service only*) Per Certificate of Service Andrew Wachter William H. Roberts, II, Esquire

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

٧.

Docket No. R-2018-3006818

Peoples Natural Gas Company LLC

# **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Interrogatories and Requests for Production of Documents Propounded by Peoples Natural Gas Company LLC and Directed to Duquesne Light Company - Set I, 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

Anthony D. Kanagy, Esquire Michael W. Gang, Esquire Devin T. Ryan, Esquire Post & Schell PC 17 North Second Street, 12<sup>th</sup> Floor Harrisburg, PA 1710-1601 Counsel for *Peoples Natural Gas Company LLC* 

Harrison W. Breitman, Esquire Christy M. Appleby, Esquire J. D. Moore, Esquire David T. Evrard, Esquire Darryl A. Lawrence, Esquire Barrett C. Sheridan, Esquire Office of Consumer Advocate 555 Walnut Street, 5th Floor Forum Place Harrisburg, PA 17101 Counsel for *Office of Consumer Advocate*  Erika L. McLain, Esquire Carrie B. Wright, Esquire Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement 400 North Street – 2 West Harrisburg, PA 17120 Counsel for *Bureau of Investigation and Enforcement* 

Erin K. Fure, Esquire Office of Small Business Advocate Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17101-1303 Counsel for Office of Small Business Advocate

Joseph L. Vullo, Esquire Burke Vullo Reilly Roberts 1460 Wyoming Avenue Forty Fort, PA 18704 Counsel for *Community Action Association* of PA (CAAP) John W. Sweet Esquire Patrick M. Cicero, Esquire Elizabeth R. Marx, Esquire Kadeem G. Morris, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 Counsel for CAUSE-PA

Todd S. Stewart Esquire Hawke McKeon and Sniscak LLP 100 North Tenth Street Harrisburg, PA 17101 Counsel for *NGS and RESA* 

Thomas J. Sniscak, Esquire Hawke McKeon and Sniscak LLP 100 North Tenth Street Harrisburg, PA 17101 Counsel for *The Pennsylvania State University* 

Scott J. Rubin, Esquire Law Office of Scott J. Rubin 330 Oak Lane Bloomsburg, PA 17815-2036 Counsel for *UWUA Local 612* 

Tishekia E. Williams, Esquire Michael Zimmerman, Esquire Emily M. Farah, Esquire Duquesne Light Company 411 Seventh Avenue 15th Floor Pittsburgh, PA 15219 Counsel for *Duquesne Light Company* 

Linda R. Evers, Esquire Donald R. Wagner, Esquire Stevens & Lee 111 North Sixth Street Reading, PA 19601 Counsel for *Duquesne Light Company* 

Michael A. Gruin, Esquire Stevens & Lee 16th Floor 17 North Second Street Harrisburg, PA 17101 Counsel for *Duquesne Light Company*  Kevin J. Moody, Esquire Pennsylvania Independent Oil and Gas Association 212 Locust Street Suite 300 Harrisburg, PA 17101-1510 Counsel for *PIOGA* 

Alessandra L. Hylander, Esquire Charis Mincavage, Esquire McNees Wallace & Nurick 100 Pine Street PO Box 1166 Harrisburg, PA 17108-1166 Counsel for *Peoples Industrial Intervenors* 

Pamela C. Polacek Esquire Vasiliki Karandrikas, Esquire Errin McCaulley, Esquire McNees Wallace & Nurick LLC 100 Pine Street PO Box 1166 Harrisburg, PA 17108-1166 Counsel for *Snyder Brothers, Inc. et al. Baker Gas, Inc. Marco Drilling, Inc. MDS Energy Development, LLC* 

Tanya M. Leshko, Esquire Alan Michael Seltzer, Esquire Buchanan Ingersoll & Rooney 409 North Second Street Suite 500 Harrisburg, PA 17101-1357 Counsel for *Equitrans LP* 

Daniel Clearfield, Esquire Carl R. Shultz, Esquire Eckert Seamans Cherin & Mellott LLC 213 Market Street 8th Floor Harrisburg, PA 17101 Counsel for *Direct Energy Business LLC, et al.* 

Theodore J. Gallagher, Esquire NiSource Corporate Services Company Energy Distribution Group Legal 121 Champion Way, Suite 100 Canonsburg, PA 15317 Counsel for *Columbia Gas of Pennsylvania, Inc.* 

#### CONSULTANTS

### Via E-mail Only

Brian Kalcic Excel Consulting 225 S. Meramec Avenue, Suite 720-T St. Louis, MO 63105 *Consultant for Office of Small Business Advocate* 

Dante Mugrace PCMG and Associates, LLC 90 Moonlight Court Toms River, NJ 08753 *Consultant for Office of Consumer Advocate* 

Glenn A. Watkins Technical Associates, Inc. 1503 Santa Rosa road, Suite 130 Richmond, VA 23229 *Consultant for Office of Consumer Advocate* 

Kevin O'Donnell Nova Energy Consultants, Inc. 1350 SE Maynard Road, Suite 101 Cary, NC 27511 Consultant for Office of Consumer Advocate Roger D. Colton Fisher, Sheehan and Colton 34 Warwick Road Belmont, MA 02478 *Consultant for Office of Consumer Advocate* 

Diane Burgraff 37 Whittakers Mill Road Williamsburg, VA 23185 *Consultant for Snyder Brothers, Inc. et al.* 

James L. Crist Lumen Group, Inc. 4226 Yarmouth Drive, Suite 101 Allison Park, PA 15101 *Consultant for Peoples Industrial Intervenors* 

Thomas Anderson 3300 Dickey Road 4-442 East Chicago, IN 46312 *Consultant for Peoples Industrial Intervenors* 

## Via Mail Only

Michael J. Healey, Esquire Healey Block & Hornack, P.C. 247 Fort Pitt Boulevard, 4<sup>th</sup> Floor Pittsburgh, PA 15222 Counsel for *United Steelworks*  Robert J. DeGregory, Esquire United Steelworks Five Gateway Center Pittsburgh, PA 15222 Counsel for *United Steelworks*  EQT Energy LLC d/b/a Equitable Energy EQT Plaza 625 Liberty Avenue Suite 1700 Pittsburgh, PA 15222

Severo C. Miglioretti 115 Shearer road New Kensington, PA 15068

Daniel Killmeyer 184 McKay Road Saxonburg, PA 16056-9726

Charles F. Hagins 420 Goucher Street Johnstown, PA 15905

Samuel Givens 132 Thunderbird Drive McKeesport, PA 15135-2138 Sean Ferris 406 Laurie Drive Penn Hills, PA 15235

James Boudreau 620 Rolling Meadows Road Waynesburg, PA 15370

Edward A. and Ann D. Bugosh 1165 Rosedale Drive Greensburg, PA 15601

David P. Zambito, Esquire Counsel for Peoples Natural Gas Company LLC

Date: May 2, 2019