



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

IN REPLY PLEASE  
REFER TO OUR FILE

May 13, 2019

Via First Class Mail & E-Mail

Anthony D. Kanagy, Esq.  
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  
**I&E Interrogatories**

Dear Mr. Kanagy,

Enclosed are the responses of the Bureau of Investigation & Enforcement (I&E) to the Interrogatories of Peoples Natural Gas Company LLC Set III (nos 1 through 12) for the above-referenced proceeding.

The following attachments will be forwarded via E-Mail:

- I&E Responses to PNG Set III (nos 2) – Attachment A
- I&E Responses to PNG Set III (nos 3) – Attachment A
- I&E Responses to PNG Set III (nos 4) – Attachment A
- I&E Responses to PNG Set III (nos 6) – Attachment A
- I&E Responses to PNG Set III (nos 7(A)) – Attachment A
- I&E Responses to PNG Set III (nos 8) – Attachment A
- I&E Responses to PNG Set III (nos 9) – Attachment A
- I&E Responses to PNG Set III (nos 10) – Attachment A
- I&E Responses to PNG Set III (nos 11) – Attachment A
- I&E Responses to PNG Set III (nos 12) – Attachment A

Hard copies have been distributed per the attached Certificate of Service.

If you have any questions, please contact me at (717) 783-6156.

Sincerely,

Carrie B. Wright

Prosecutor

Bureau of Investigation & Enforcement  
PA Attorney I.D. No. 208185

CBW/jfm

Enclosure

cc: Secretary Chiavetta (Cover Letter & COS Only)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

Peoples Natural Gas Company LLC

:  
:  
:  
:  
:

Docket No. R-2018-3006818

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Interrogatory Responses to PNG Set III (nos 1-12)** dated May 13, 2019, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

**Served via Electronic and First-Class Mail**

Anthony D. Kanagy, Esq.  
Michael W. Gang, Esq.  
Devin T. Ryan, Esq.  
Post & Schell PC  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[mgang@postschell.com](mailto:mgang@postschell.com)  
[dryan@postschell.com](mailto:dryan@postschell.com)  
*Counsel for Peoples Natural Gas Co.*

David P Zambito, Esq.  
Jonathan P. Nase, Esq.  
Cozen O'Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101  
[dzambito@cozen.com](mailto:dzambito@cozen.com)  
[jnase@cozen.com](mailto:jnase@cozen.com)  
*Counsel for Peoples Natural Gas Co.*

Erin K. Fure, Esq.  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101  
[efure@pa.gov](mailto:efure@pa.gov)

Darryl Lawrence, Esq.  
Barrett C. Sheridan, Esq.  
Christy M. Appleby, Esq.  
Harrison W. Breitman, Esq.  
David T. Evrard, Esq.  
J.D. Moore, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor Forum Place  
Harrisburg, PA 17101  
[Peoples2019@paoca.org](mailto:Peoples2019@paoca.org)

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

Scott J. Rubin, Esq  
Law Office of Scott J. Rubin  
333 Oak Lane  
Bloomsburg, PA 17815-2036  
[scott.j.rubin@gmail.com](mailto:scott.j.rubin@gmail.com)  
*Counsel for UWUA Local 612*

Kevin J. Moody, Esq.  
PA Independent Oil & Gas Assoc.  
212 Locust Street, Suite 300  
Harrisburg, PA 17101  
[kevin@pioga.org](mailto:kevin@pioga.org)  
*Counsel for PA Independent Oil & Gas Assoc.*

Todd S. Stewart, Esq.  
Hawke McKeon & Sniscak LLP  
100 N. 10th Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
*Counsel for  
Natural Gas Supplier Parties and  
The Retail Energy Supply Assoc.*

Alan M. Seltzer, Esq.  
Tanya Leshko, Esq.  
Buchanan Ingersoll & Rooney PC  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101-1357  
[alan.seltzer@bipc.com](mailto:alan.seltzer@bipc.com)  
*Counsel for Equitrans LP*

Vasiliki Karandrikas, Esq.  
Pamela C. Polacek, Esq.  
Errin T. McCaulley, Jr. Esq.  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[vkandrikas@mcneeslaw.com](mailto:vkandrikas@mcneeslaw.com)  
[ppolacek@mcneeslaw.com](mailto:ppolacek@mcneeslaw.com)  
[emccaulley@mcneeslaw.com](mailto:emccaulley@mcneeslaw.com)  
*Counsel for SBI,  
Techs Industries, Inc.,  
Marco Drilling, Inc.,  
Baker Gas*

Charis Mincavage, Esq.  
Alessandra L. Hylander, Esq.  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[ahylander@mcneeslaw.com](mailto:ahylander@mcneeslaw.com)  
*Counsel for  
Peoples Industrial Intervenors*

Harry S. Geller, Esq.  
118 Locust Street  
Harrisburg, PA 17101  
[hgellerpulp@palegalaid.com](mailto:hgellerpulp@palegalaid.com)  
*Witness for CAUSE-PA*

Brian Kalcic  
Excel Consulting  
225 S. Meramec Avenue  
Suite 720-T  
St. Louis, MO 63105  
[excel.consulting@sbcglobal.net](mailto:excel.consulting@sbcglobal.net)  
*Witness for OSBA*

Diane Burgraff  
37 Whittakers Mill Road  
Williamsburg, VA 23185  
[dmburgraff@outlook.com](mailto:dmburgraff@outlook.com)  
*Witness for SBI*

James L. Crist  
Lumen Group, Inc.  
4226 Yarmouth Drive, Suite 101  
Allison Park, PA 15101  
[jlcris@aol.com](mailto:jlcris@aol.com)  
*Expert Witness for PII*

Dante Mugrace  
PCMG and Associates, LLC  
90 Moonlight Court  
Toms River, NJ 08753  
[dmugrace@pcmgregcon.com](mailto:dmugrace@pcmgregcon.com)  
*Expert Witness for OCA*

Glenn A. Watkins  
Technical Associates, Inc.  
1503 Santa Rosa Road  
Suite 130  
Richmond, VA 23229  
[watkinsg@tai-econ.com](mailto:watkinsg@tai-econ.com)  
*Expert Witness for OCA*

Kevin O'Donnell  
Nova Energy Consultants, Inc.  
1350 SE Maynard Road  
Suite 101  
Cary, NC 27511  
[kodonnell@novaenergyconsultants.com](mailto:kodonnell@novaenergyconsultants.com)  
*Expert Witness for OCA*

Roger Colton  
Fisher, Sheehan and Colton  
34 Warwick Road  
Belmont, MA 02478  
[roger@fsconline.com](mailto:roger@fsconline.com)  
*Expert Witness for OCA*

Emily M. Farah, Esq.  
Tishekia Williams, Esq.  
Michael Zimmerman, Esq.  
Duquesne Light Company  
411 7th Avenue, 15th Floor  
Pittsburgh, PA 15219  
[efarah@duqlight.com](mailto:efarah@duqlight.com)  
[twilliams@duqlight.com](mailto:twilliams@duqlight.com)  
[mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)  
*Counsel for Duquesne Light*

Linda R. Evers, Esq.  
Donald R. Wagner, Esq.  
Michael A. Gruin, Esq.  
Stevens & Lee  
111 N. Sixth Street  
Reading, PA 19601  
[lre@stevenslee.com](mailto:lre@stevenslee.com)  
[drw@stevenslee.com](mailto:drw@stevenslee.com)  
[mag@stevenslee.com](mailto:mag@stevenslee.com)  
*Counsel for Duquesne Light*

Daniel Clearfield, Esq.  
Carl Shultz, Esq.  
Eckert Seamans Cherin & Mellott LLC  
213 Market Street, 8th Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[kmarsilio@eckertseamans.com](mailto:kmarsilio@eckertseamans.com)  
*Counsel for*  
*Direct Energy Business, LLC*  
*Direct Energy Services, LLC*  
*Direct Energy Business Marketing, LLC*

Joseph L. Vullo, Esq.  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@aol.com](mailto:jlvullo@aol.com)  
*Counsel for Community Action*  
*Association of Pennsylvania (CAAP)*

**Served via E-Mail Only**

William H. Roberts II, Esq.  
Peoples Natural Gas Company LLC  
Pittsburgh, PA 15212  
[william.h.roberts@peoples-gas.com](mailto:william.h.roberts@peoples-gas.com)  
*Counsel for Peoples Natural Gas*

Andrew P. Wachter  
PNG Companies LLC  
[andrew.wachter@peoples-gas.com](mailto:andrew.wachter@peoples-gas.com)



Carrie B. Wright  
Prosecutor  
Bureau of Investigation & Enforcement  
PA Attorney I.D. No. 208185