


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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consumer@paoca.org

August 20, 2019

Adeolu A. Bakare, Esquire  
Pamela C. Polacek, Esquire  
Matthew L. Garber, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

Re: Pennsylvania Public Utility Commission  
v.  
Valley Energy, Inc. - Supplement No. 49  
to Tariff Electric – Pa. P.U.C. No. 2  
Docket No. R-2019-3008209

Dear Counsel:

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

Lafayette K. Morgan  
Stacy L. Sherwood  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway  
Suite 300  
Columbia, MD 21044-3575  
E-Mail: [lmorgan@exeterassociates.com](mailto:lmorgan@exeterassociates.com)  
[sherwood@exeterassociates.com](mailto:sherwood@exeterassociates.com)

Adeolu A. Bakare, Esquire  
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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).

Sincerely,

/s/ J.D. Moore  
J.D. Moore  
Assistant Consumer Advocate  
PA Attorney I.D. # 326292  
E-Mail: [JMoore@paoca.org](mailto:JMoore@paoca.org)

Enclosures:

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

\*277767

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :  
v. : Docket No. R-2019-3008209  
Valley Energy, Inc. – Supplement No. 49 to :  
Tariff Electric – Pa. P.U.C. No. 2 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to Valley Energy, Inc., Set II, 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 20<sup>th</sup> day of August 2019.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

John M. Coogan, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

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

Adeolu A. Bakare, Esquire  
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Matthew L. Garber, Esquire  
McNees Wallace & Nurick LLC  
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P.O. Box 1166  
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Sharon E. Webb, Esquire  
Office of Small Business Advocate  
300 North Second Street  
Commerce Building  
Suite 202  
Harrisburg, PA 17101-1303

Brian Kalcic  
Excel Consulting  
225 South Meramec Avenue  
Suite 720  
St. Louis, MO 63105

SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

Larry E. Cole  
74 East Laurel Street  
Monroeton, PA 18832-8839

/s/ J.D. Moore

J.D. Moore

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E-Mail: [DLawrence@paoca.org](mailto:DLawrence@paoca.org)

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Dated: August 20, 2019

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