COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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



March 23, 2020

Via Electronic Mail Only Daniel Clearfield, Esquire Sarah Stoner, Esquire Eckert Seamans Cherin & Mellott, LLC 213 Market Street 8th Floor Harrisburg, PA 17101

> Re: Pennsylvania Public Utility Commission

Philadelphia Gas Works Docket No. R-2020-3017206

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set I, 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:

> Jerome D. Mierzwa Exeter Associates, Inc. 10480 Little Patuxent Pkwy Suite 300 Columbia, MD 21044-3575 E-Mail: OCAPGW2020@paoca.org

Daniel Clearfield, Esquire Sarah Stoner, Esquire March 23, 2020 Page 2

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

Enclosures:

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

Certificate of Service

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CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :

v. : Docket No. R-2020-3017206

Philadelphia Gas Works :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Philadelphia Gas Works, Set I, 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 23rd day of March 2020.

SERVICE BY E-MAIL ONLY

Carrie B. Wright, Esquire Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor Harrisburg, PA 17120

Daniel Clearfield, Esquire Sarah Stoner, Esquire Eckert Seamans Cherin & Mellott, LLC 213 Market Street 8th Floor Harrisburg, PA 17101

Graciela Christlieb, Esquire Philadelphia Gas Works 800 West Montgomery Avenue Philadelphia, PA 19122

Todd S. Stewart, Esquire Hawke McKeon & Sniscak LLP 100 North 10th Street Harrisburg, PA 17101 Sharon E. Webb, Esquire
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John W. Sweet, Esquire Elizabeth R. Marx, Esquire Ria M. Pereira, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101

Gregory J. Stunder, VP Philadelphia Gas Works 800 West Montgomery Avenue Philadelphia, PA 19122 /s/ Christy M. Appleby Christy M. Appleby Assistant Consumer Advocate PA Attorney I.D. # 85824 E-Mail: CAppleby@paoca.org

Darryl A. Lawrence Senior Assistant Consumer Advocate PA Attorney I.D. # 93682 E-Mail: <u>DLawrence@paoca.org</u> Santo G. Spataro Assistant Consumer Advocate PA Attorney I.D. # 327494 E-Mail: <u>SSpataro@paoca.org</u>

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Dated: March 23, 2020

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