COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

April 30, 2020



@pa oca



FAX (717) 783-7152 consumer@paoca.org

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 XII, 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:

David S. Habr **Habr Economics** 213 Cornuta Way Nipomo, CA 93444-5020

E-Mail: OCAPGW2020@paoca.org

Daniel Clearfield, Esquire Sarah Stoner, Esquire April 30, 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/ Santo G. Spataro
Santo G. Spataro
Assistant Consumer Advocate
PA Attorney I.D. # 327494
E-Mail: SSpataro@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 XII, 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 30th day of April 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

Gregory J. Stunder, VP Graciela Christlieb, Esquire Philadelphia Gas Works 800 West Montgomery Avenue Philadelphia, PA 19122

Charis Mincavage, Esquire Adeolu A. Bakare, Esquire Jo-Anne Thompson, Esquire McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 Sharon E. Webb, Esquire
Daniel G. Asmus, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923

John W. Sweet, Esquire Elizabeth R. Marx, Esquire Ria M. Pereira, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101

Todd S. Stewart, Esquire Hawke McKeon & Sniscak LLP 100 North 10th Street Harrisburg, PA 17101

Josie B. H. Pickens, Esquire Joline R. Price, Esquire Robert W. Ballenger, Esquire Community Legal Services, Inc. 1410 West Erie Avenue Philadelphia, PA 19140 /s/ Santo G. Spataro
Santo G. Spataro
Assistant Consumer Advocate
PA Attorney I.D. # 327494
E-Mail: SSpataro@paoca.org

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Assistant Consumer Advocate
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Harrisburg, PA 17101-1923
Phone: (717) 783-5048

Fax: (717) 783-7152 Dated: April 30, 2020

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