## **COMMONWEALTH OF PENNSYLVANIA**



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PATRICK M. CICERO Consumer Advocate

February 21, 2024

# Via Electronic Mail Only

Michael W. Gang, Esquire Anthony D. Kanagy, Esquire Nicholas A. Stobbe, Esquire Post & Schell, P.C. 17 North Second Street 12th Floor Harrisburg, PA 17101-1601 mgang@postschell.com akanagy@postschell.com

Re: Pennsylvania Public Utility Commission v. Peoples Natural Gas Company LLC Docket Nos. R-2023-3044549

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Sets 13-15, in this matter.

In accordance with the discovery modifications adopted in Administrative Law Judge Long's Prehearing Conference Order issued on February 5, 2024, we request Peoples Natural Gas Company, LLC provide verified answers to these inquiries within ten (10) 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.

Michael W. Gang, Esquire Anthony D. Kanagy, Esquire Nicholas A. Stobbe, Esquire February 21, 2024 Page 2

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

## OCAPNG2023BRC@paoca.org

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,

In L'Mule

Gina L. Miller Assistant Consumer Advocate PA Attorney I.D. # 313863 GMiller@paoca.org

**Enclosures:** 

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

4866-2602-7162

## CERTIFICATE OF SERVICE

| Pennsylvania Public Utility Commission | : |                            |
|--|---|----------------------------|
|  | : |                            |
| V.                                     | : | Docket Nos. R-2023-3044549 |
|  | : |                            |
| Peoples Gas Company LLC                | : |                            |

I hereby certify that I have this day served a true copy of the following documents, the

Office of Consumer Advocate's Interrogatories to Peoples Natural Gas Company LLC, Sets 13-

15, 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.

This document was filed electronically on the Commission's electronic filing system.

Dated this 21<sup>st</sup> day of February, 2024.

#### SERVICE BY E-MAIL ONLY

Scott B. Granger, Esquire Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2<sup>nd</sup> Floor Harrisburg, PA 17120 sgranger@pa.gov *Counsel for I&E* 

Meagan Moore, Esq. PNG Companies LLC 375 North Shore Drive, 4th Fl. Pittsburgh, PA 15212 meagan.moore@peoples-gas.com *Counsel for Peoples Natural Gas*  Steven C. Gray, Esquire Rebecca Lyttle, Esquire Office of Small Business Advocate 555 Walnut Street 1<sup>st</sup> Floor, Forum Place Harrisburg, PA 17101-1923 sgray@pa.gov relyttle@pa.gov *Counsel for OSBA* 

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#### SERVICE BY E-MAIL ONLY (continued)

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- P Mule

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Dated: February 21, 2024