

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

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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  
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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, Set 16, 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  
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We also request that you send a copy of the answers directly to our group e-mail, as listed below:

[OCAPNG2023BRC@paoca.org](mailto: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,

A handwritten signature in blue ink, appearing to read "Gina L. Miller", is written over a light blue horizontal line.

Gina L. Miller  
Assistant Consumer Advocate  
PA Attorney I.D. # 313863  
[GMiller@paoca.org](mailto: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, Set 16, 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  
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Dated: February 21, 2024