

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

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

 @pa\_oca  
 /pennoca  
FAX (717) 783-7152  
consumer@paoca.org  
www.oca.pa.gov

February 29, 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  
nstobbe@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, Set 18, 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 29, 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](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, reading "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 18, 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 29th 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, 2nd Floor
Harrisburg, PA 17120
sgranger@pa.gov
Counsel for I&E

Steven C. Gray, Esquire
Rebecca Lyttle, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
sgray@pa.gov
relyttle@pa.gov
Counsel for OSBA

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

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
nstobbe@postschell.com
Counsel for Peoples Gas Division

SERVICE BY E-MAIL ONLY (continued)

Kevin J. Moody, Esquire  
Pennsylvania Independent Oil & Gas Asso.  
212 Locust Street,  
Suite 300  
Harrisburg, PA 17101-1510  
kevin@pioga.org  
*Counsel for PIOGA*

Joseph L. Vullo, Esquire  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
jlvullo@bvrrlaw.com  
*Counsel for Pennsylvania Weatherization Providers  
Task Force*

Elizabeth R. Marx, Esquire  
John W. Sweet, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
pulp@pautilitylawproject.org  
*Counsel for Coalition for Affordable Utility Services  
and Energy Efficiency in Pennsylvania*

Charis Mincavage, Esquire  
Adeolu A. Bakare, Esquire  
Kenneth R. Stark, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street, P.O. Box 1166  
Harrisburg, PA 17108-1166  
cmincavage@mcneeslaw.com  
abakare@mcneeslaw.com  
kstark@mcneeslaw.com  
*Counsel for Peoples Industrial Intervenors*



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

Aron J. Beatty  
Senior Assistant Consumer Advocate  
Christopher M. Andreoli  
Jacob D. Guthrie  
Assistant Consumer Advocates  
OCAPNG2023BRC@paoca.org

*Counsel for:*  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
717-783-5048

Dated: February 29, 2024