



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

March 8, 2024

Via Electronic Mail

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

Meagan Moore, Esq.
PNG Companies LLC
375 North Shore Drive, 4th Floor
Pittsburgh, PA 15212
Meagan.moore@peoples-gas.com

Re: Pennsylvania Public Utility Commission v.
Peoples Natural Gas Company LLC – Base Rate Case
Docket No. R-2023-3044549
I&E Interrogatory Set RS (no. 3)

Dear Counsel:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Interrogatory Set RS (no. 3) – Cline**, in the above-captioned proceeding. Please restate the Interrogatory before responding and start the Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to this Interrogatory are due within ten (10) calendar days of service. Please provide your responses via email to the email address listed below.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Scott B. Granger
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 63641
(717) 425-7593
sgranger@pa.gov

SBG/jfm
Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter and Certificate of Service only – via e-file*)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2023-3044549
 :
 Peoples Natural Gas Company LLC :
 Base Rate Case :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatory Set RS (no. 3) – Cline** dated March 8, 2024, in the manner and upon the person listed below.

Served via Electronic Mail Only

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 Company LLC

Michael W. Gang, Esq.
Anthony D. Kanagy, Esq.
Nicholas A. Stobbe, Esq.
Post & Schell, PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
nstobbe@postschell.com
Counsel for
Peoples Natural Gas Company LLC

Andrew P. Wachter
Director, Finance and Regulation
Peoples Natural Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
andrew.wachter@peoples-gas.com
Witness for
Peoples Natural Gas Company LLC

Gina L. Miller, Esq.
Jacob D. Guthrie, Esq.
Aron J. Beatty, Esq.
Harrison W. Breitman, Esq.
Officer of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
OCAPNG2023BRC@paoca.org

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

Kevin J. Moody, Esq.
Pennsylvania Independent Oil & Gas
Association
212 Locust Street, Suite 300
Harrisburg, PA 17101
kevin@pioga.org
Counsel for PIOGA

Joseph L. Vullo, Esq.
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
Counsel for PWPTF

Aaron Rothschild
Rothschild Financial Consulting
15 Lake Road
Ridgefield, CT 06877
OCAPNG2023BRC@paoca.org
Consultant for OCA

John W. Sweet, Esq.
Ria M. Pereira, Esq.
Elizabeth R. Marx, Esq.
Lauren N. Berman, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
Counsel for CAUSE-PA

Roger Colton
Fisher, Sheehan & Colton
34 Warwick Road
Belmont, MA 02478-2841
OCAPNG2023BRC@paoca.org
Consultant for OCA

Charis Mincavage, Esq.
Adeolu A. Bakare, Esq.
Kenneth R. Stark, Esq.
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 PII

Dante Mugrace
PCMG and Associates
90 Moonlight Court
Toms River, NJ 08753
OCAPNG2023BRC@paoca.org
Consultant for OCA


Clarence Johnson
CJ Energy
3707 Robinson Avenue
Austin, TX 78722
OCAPNG2023BRC@paoca.org
Consultant for OCA

David Evrard
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
OCAPNG2023BRC@paoca.org
Consultant for OCA

Barbara Alexander
Barbara Alexander Consulting LLC
44 Beech Street
Hallowell, ME 04347
OCAPNG2023BRC@paoca.org
Consultant for OCA

Mark Ewen
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
mde@indecon.com
Witness for OSBA

Robert D. Knecht
Industrial Economics Incorporated
5 Plymouth Road
Lexington, MA 02421
rdk@indecon.com
Witness for OSBA



Scott B. Granger
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 63641
(717) 425-7593
sgranger@pa.gov