



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

April 19, 2024

**Via Electronic Mail**

Michael W. Gang, Esq.  
Anthony D. Kanagy, Esq.  
Nicholas A. Stobbe, Esq.  
Post & Schell, PC  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[mgang@postschell.com](mailto:mgang@postschell.com)  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[nstobbe@postschell.com](mailto:nstobbe@postschell.com)

Meagan Moore, Esq.  
PNG Companies LLC  
375 North Shore Drive, 4<sup>th</sup> Floor  
Pittsburgh, PA 15212  
[Meagan.moore@peoples-gas.com](mailto: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 RE (no. 59)**

Dear Counsel:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Interrogatory Set RE (no. 59) - Keller**, 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](mailto: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 RE (no. 59) Keller** dated April 19, 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](mailto: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](mailto:mgang@postschell.com)  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[nstobbe@postschell.com](mailto: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](mailto: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](mailto: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](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

Kevin J. Moody, Esq.  
Pennsylvania Independent Oil & Gas  
Association  
212 Locust Street, Suite 300  
Harrisburg, PA 17101  
[kevin@pioga.org](mailto:kevin@pioga.org)  
*Counsel for PIOGA*

Joseph L. Vullo, Esq.  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Counsel for PWPTF*

Aaron Rothschild  
Rothschild Financial Consulting  
15 Lake Road  
Ridgefield, CT 06877  
[OCAPNG2023BRC@paoca.org](mailto: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](mailto:pulp@pautilitylawproject.org)  
*Counsel for CAUSE-PA*

Roger Colton  
Fisher, Sheehan & Colton  
34 Warwick Road  
Belmont, MA 02478-2841  
[OCAPNG2023BRC@paoca.org](mailto: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](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[kstark@mcneeslaw.com](mailto:kstark@mcneeslaw.com)  
*Counsel for PII*

Dante Mugrace  
PCMG and Associates  
90 Moonlight Court  
Toms River, NJ 08753  
[OCAPNG2023BRC@paoca.org](mailto:OCAPNG2023BRC@paoca.org)  
*Consultant for OCA*

Clarence Johnson  
CJ Energy  
3707 Robinson Avenue  
Austin, TX 78722  
[OCAPNG2023BRC@paoca.org](mailto: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](mailto:OCAPNG2023BRC@paoca.org)  
*Consultant for OCA*

Barbara Alexander  
Barbara Alexander Consulting LLC  
44 Beech Street  
Hallowell, ME 04347  
[OCAPNG2023BRC@paoca.org](mailto:OCAPNG2023BRC@paoca.org)  
*Consultant for OCA*

Mark Ewen  
Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[mde@indecon.com](mailto:mde@indecon.com)  
*Witness for OSBA*

Robert D. Knecht  
Industrial Economics Incorporated  
5 Plymouth Road  
Lexington, MA 02421  
[rdk@indecon.com](mailto: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](mailto:sgranger@pa.gov)