



May 13, 2013

VIA E-MAIL AND FIRST CLASS MAIL

David P. Zambito
Direct Phone 717-703-5892
Direct Fax 215-989-4216
dzambito@cozen.com

Teresa K. Schmittberger, Esquire
McNees Wallace and Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Re: Joint Petition for Generic Investigation or Rulemaking Regarding "Gas-On-Gas" Competition Between Jurisdictional Natural Gas Distribution Companies; Docket No. P-2011-2277868

Generic Investigation Regarding Gas-On-Gas Competition Between Jurisdictional Natural Gas Distribution Companies; Docket No. I-2012-2320323

PEOPLES NATURAL GAS COMPANY LLC'S RESPONSE TO INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA TO PEOPLES, SET 1, QUESTION 1

Dear Ms. Schmittberger:

Enclosed please find two (2) copies of Peoples Natural Gas Company LLC's Responses to the above-referenced discovery requests. All active parties to this proceeding have been served in accordance with the enclosed Certificate of Service. If you have any questions, please feel free to contact me.

Sincerely,

COZEN O'CONNOR

By: David P. Zambito
Counsel for Peoples Natural Gas Company LLC

DPZ/kmg
Enclosure

cc: Rosemary Chiavetta, Secretary (*Letter and Certificate of Service only*)
Per Certificate of Service

VERIFICATION

I, Joseph A. Gregorini, hereby state that I am Vice President, Rates and Regulatory Affairs, of Peoples Natural Gas Company LLC; that I am authorized to and make this verification for it; that the facts set forth in the foregoing responses to the Industrial Energy consumers of Pennsylvania Interrogatories (Set 1) to Peoples Natural Gas Company LLC are true and correct (or are true and correct to the best of my knowledge, information and belief); and that I expect Peoples Natural Gas Company LLC to be able to prove the same at a hearing in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 5/13/13

Joseph A. Gregorini
(Signature)

CERTIFICATE OF SERVICE
Docket Nos. P-2011-2277868 and I-2012-2320323

I hereby certify that I have this day served a true copy of the foregoing Peoples Natural Gas Company LLC's Response to IECPA to Peoples 1-1 upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA FIRST CLASS MAIL AND ELECTRONIC MAIL:

Allison C. Kaster, Esquire
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
Commonwealth Keystone Building, 2 West
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Tanya J. McCloskey, Esquire
Darryl Lawrence, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1923

Elizabeth Rose Triscari, Esquire
Sharon E. Webb, Esquire
Office of Small Business Advocate
300 North Second Street
Suite 1102
Harrisburg, PA 17101

Theodore J. Gallagher, Esquire
NiSource Corporate Services Company
121 Champion Way, Suite 100
Canonsburg, PA 15317

Mark C. Morrow, Esquire
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406

William H. Roberts II, Esquire
Peoples Natural Gas Company LLC
375 North Shore Drive, Suite 600
Pittsburgh, PA 15212

Jennifer L. Petrisek, Esquire
Peoples TWP LLC
375 North Shore Drive, Suite 600
Pittsburgh, PA 15212

Thomas J. Sniscak, Esquire
William E. Lehman, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105-1778
Counsel for *The Pennsylvania State University*

Maureen Geary Krowicki, Esquire
National Fuel Gas Distribution Corporation
1100 State Street
P.O. Box 2081
Erie, PA 16512

Bruce V. Miller, Esquire
Cullen and Dykman LLP
Long Island
100 Quentin Roosevelt Boulevard
Garden City, NY 11530-4850
Counsel for *National Fuel Gas Distribution Corporation*

Donna M. J. Clark, Esquire
Energy Association of Pennsylvania
800 North Third Street
Suite 205
Harrisburg, PA 17101

Amy W. Neufeld, Esquire
PECO Energy Company
500 North Third Street
Suite 800
Harrisburg, PA 17101

David W. Gray, Esquire
Equitable Gas Company LLC
225 North Shore Drive
Third Floor
Pittsburgh, PA 15212

Michael S. Swerling, Esquire
Exelon Business Services Company
2301 Market Street/S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

Charles E. Thomas, Jr., Esquire
Thomas T. Niesen, Esquire
Thomas Long Niesen & Kennard
212 Locust Street
P.O. Box 9500
Harrisburg, PA 17108-9500
Counsel for *Equitable Gas Company, LLC*

Kevin J. Moody, Esquire
Pennsylvania Independent Oil & Gas
Association
212 Locust Street
Suite 300
Harrisburg, PA 17101-1510

Tishekia Williams, Esquire
Duquesne Light Company
411 Seventh Avenue
16th Floor
Pittsburgh, PA 15219

Consultants to Public Advocates

Brian Kalcic, Consultant
Excel Consulting
222 S. Meramec Avenue, Suite 720-T
St. Louis, MO 63105

Robert D. Knecht, Consultant
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Glen A. Watkins, Executive VP/Consultant
Technical Associates, Inc.
9030 Stony Point Parkway
Suite 580
Richmond, VA 23235



David P. Zambito, Esquire
Counsel for *Peoples Natural Gas Company LLC*

Date: May 13, 2013