



November 6, 2013

**VIA ELECTRONIC AND FIRST CLASS MAIL**

**David P. Zambito**

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

Michael W. Gang, Esq.  
Post & Schell, P.C.  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101-1601

**Re: Pennsylvania Public Utility Commission, et al. v. Duquesne Light Company;  
Docket Nos. R-2013-2372129, C-2013-2390562, et al.**

Dear Mr. Gang:

On behalf of NRG Power Midwest LP, NRG Energy Center Pittsburgh LLC, and Reliant Energy Northeast LLC, enclosed please find the *Interrogatories and Requests for Production of Documents Propounded by the NRG Companies on Duquesne Light Company (Set I)*.

Pursuant to the October 22, 2013 Prehearing Order in this matter, answers to written interrogatories are due in-hand within ten (10) days of service of these materials. Responses accordingly will be due by November 18, 2013. Please do not hesitate to contact the undersigned should you have any questions regarding these requests or require additional information. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR

By: David P. Zambito  
Counsel for NRG Power Midwest LP,  
NRG Energy Center Pittsburgh LLC, and  
Reliant Energy Northeast LLC

DPZ:JLB  
Enclosures

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service Only*)  
Certificate of Service

**CERTIFICATE OF SERVICE**  
**Docket Nos. R-2013-2372129 et al.**

I hereby certify that I have this day served a true copy of the *Interrogatories and Requests for Production of Documents Propounded by the NRG Companies on Duquesne Light Company (Set I)* upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA ELECTRONIC AND FIRST CLASS MAIL**

Robert H. Hoaglund, II, Esq.  
Tishekia E. Williams, Esq.  
Duquesne Light Company  
411 Seventh Avenue, 16th Floor  
Pittsburgh, PA 15219  
rhoaglund@duqlight.com  
twilliams@duqlight.com

Michael W. Gang, Esq.  
Anthony D. Kanagy, Esq.  
Post & Schell, P.C.  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101-1601  
mgang@postschell.com  
akanagy@postschell.com  
*Counsel for Duquesne Light Company*

Candis A. Tunilo, Esq.  
David T. Evrard, Esq.  
Amy E. Hirakis, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923  
ctunilo@paoca.org  
devrard@paoca.org  
ahirakis@paoca.org  
(C-2013-2379084)

Theodore S. Robinson  
Citizen Power  
2121 Murray Avenue  
Pittsburgh, PA 15217  
robinson@citizenpower.com  
*Counsel for Citizen Power*

Sharon E. Webb, Esq.  
Office of Small Business Advocate  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101  
swebb@pa.gov  
(C-2013-2380474)

Todd S. Stewart, Esq.  
Hawke McKeon & Sniscak LLP  
P.O. Box 1778  
100 N. Tenth Street  
Harrisburg, PA 17105-1778  
tsstewart@hmslegal.com  
*Counsel for Interstate Gas Supply, Inc.*

Charles Daniel Shields, Esq.  
Scott B. Granger, Esq.  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
chshields@pa.gov  
sgranger@pa.gov

Derrick Price Williamson, Esq.  
Barry A. Naum, Esq.  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Blvd., Ste. 101  
Mechanicsburg, PA 17050  
dwilliamson@spilmanlaw.com  
bnaum@spilmanlaw.com  
*Counsel for U.S. Steel*

Scott J. Rubin, Esq.  
333 Oak Lane  
Bloomsburg, PA 17815-2036  
scott.j.rubin@gmail.com  
*Counsel for I.B.E.W., Local 29*

Harry S. Geller, Esq.  
Patrick M. Cicero, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
pulp@palegalaid.net  
*Counsel for CAUSE-PA*

Joseph L. Vullo, Esq.  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
jlvullo@aol.com  
*Counsel for CAAP*

Pamela C. Polacek, Esq.  
Teresa K. Schmittberger, Esq.  
McNees Wallace & Nurick  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
ppolacek@mwn.com  
*Counsel for Duquesne Industrial Intervenors*  
(C-2013-2385292)

**CONSULTANTS**  
**(VIA ELECTRONIC MAIL ONLY)**

Charlie King  
Edward D. Christian  
Snively King Majoros & Assoc., Inc.  
4351 Garden City Drive, Suite 350  
Landover, MD 20785  
charlieking@snively-king.com  
echristian@snively-king.com  
*Consultants for OCA*

Roger D. Colton  
Fisher, Sheehan & Colton  
34 Warwick Road  
Belmont, MA 02478  
roger@fsconline.com  
*Consultants for OCA*

David J. Effron  
Berkshire Consulting Services  
12 Pond Path  
Northampton, NJ 03862  
djeffron@aol.com  
*Consultants for OCA*

Glenn A. Watkins  
Technical Associates, Inc.  
9030 Stony Point Parkway, Suite 580  
Richmond, VA 23235  
watkinsg@tai-econ.com  
*Consultants for OCA*

Brian Kalcic, Consultant  
Excel Consulting  
222 S. Meramec Avenue, Suite 720-T  
St. Louis, MO 63105  
excel.consulting@sbcglobal.net  
*Consultants for OSBA*

Jeffry Pollock  
J. Pollock, Inc.  
12655 Olive Blvd, Suite 335  
St. Louis, MO 63141  
jpollock@jpollockinc.com  
*Consultants for DII*

DATED: November 6, 2013



David P. Zambito, Esq.  
*Counsel for NRG Power Midwest LP,  
NRG Energy Center Pittsburgh LLC, and  
Reliant Energy Northeast LLC*