

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
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FAX (717) 783-7152
consumer@paoca.org

March 14, 2016

Daniel Clearfield, Esquire
Deanne M. O'Dell, Esquire
Eckert, Seaman, Cherin & Mellott, LLC
213 Market St., 8th Floor
Harrisburg, PA 17101

Re: Pennsylvania Public Utility Commission
v.
Philadelphia Gas Works
Docket No. R-2016-2526700

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set III, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) 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.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Jerome D. Mierzwa
Exeter Associates, Inc.
10480 Little Patuxent Parkway
Suite 300
Columbia, MD. 21044
jmierzwa@exeterassociates.com

Daniel Clearfield, Esquire
Deanne M. O'Dell, Esquire
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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,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org

Enclosures

cc: PUC Secretary Chiavetta, (letter and Certificate of Service only)
Certificate of Service

218380

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :
v. : Docket Nos. R-2016-2526700
Philadelphia Gas Works :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories, Set III, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 14th day of March 2016.

SERVICE BY HAND DELIVERY and FIRST CLASS MAIL

Gina L. Lauffer, Esquire
Bureau of Investigation & Enforcement
400 North Street
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

Daniel Clearfield, Esquire
Deanne M. O’Dell, Esquire
Eckert, Seaman, Cherin & Mellott, LLC
213 Market St., 8th Floor
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Philadelphia Gas Works

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Office of Small Business Advocate
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Raquel Guzman, Esquire
Assistant General Counsel
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

Charis Mincavage, Esquire
Adeolu A. Bakare, Esquire
Alessandra L. Hylander, Esquire
McNees, Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
PICGUG

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org

Counsel for
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