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March 24, 2016

VIA ELECTRONIC FILING

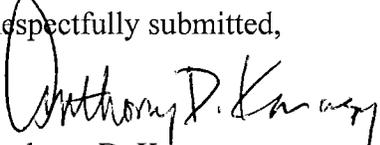
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Whemco-Steel Castings, Inc. v. Duquesne Light Company
Docket No. C-2014-2459527

Dear Secretary Chiavetta:

Enclosed please find the Further Motion to Compel Answers to Interrogatories and Requests for Production of Documents Propounded by Duquesne Light Company on Whemco-Steel Castings, Inc., Sets IV and V in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,


Anthony D. Kanagy

ADK/skr
Enclosure

cc: Honorable Jeffrey Watson
Certificate of Service

**CERTIFICATE OF SERVICE
(Docket No. C-2014-2459527)**

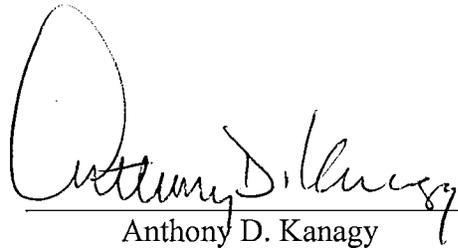
I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL and REGULAR MAIL

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409 N. Second Street, Suite 500
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Ricky L. Bertram, Esquire
General Counsel
Park Corporation
6200 Riverside Drive
Cleveland, OH 44135

Date: March 24, 2016


Anthony D. Kanagy

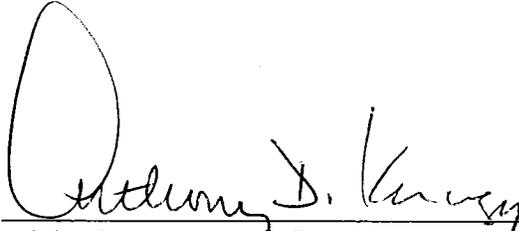
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Whemco-Steel Castings, Inc.	:	
	:	
v.	:	Docket No. C-2014-2459527
	:	
Duquesne Light Company	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Krysia M. Kubiak (ID # 90619)
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akanagy@postschell.com

Date: March 24, 2016

Attorneys for Duquesne Light Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Whemco-Steel Castings, Inc.	:	
	:	
v.	:	Docket No. C-2014-2459527
	:	
Duquesne Light Company	:	

**FURTHER MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY DUQUESNE
LIGHT COMPANY ON WHEMCO-STEEL CASTINGS, INC., SETS IV AND V**

TO ADMINISTRATIVE LAW JUDGE JEFFREY A. WATSON:

As explained herein, Duquesne Light Company (“Duquesne Light” or the “Company”) hereby files, pursuant to 52 Pa. Code § 5.342, this Further Motion to Compel Answers to its Fourth and Fifth Sets of Interrogatories and Requests for Production of Documents (“Set IV Discovery” and “Set V Discovery,” respectively) directed to Whemco-Steel Castings, Inc. (“Whemco”). The Further Motion to Compel requests that Administrative Law Judge Jeffrey A. Watson (the “ALJ”) direct Whemco to provide full and complete responses to Question 12 of the Set IV Discovery (including documents that are not privileged) and Question 11 of the Set V Discovery as is required by 52 Pa. Code § 5.342(a)(4).

As explained below, Whemco’s responses to Question 12 of the Set IV Discovery and Question 11 of the Set V Discovery were non-responsive and/or not full and complete as is required by the Commission’s regulations. Therefore, Duquesne Light is filing this Further Motion to Compel with respect to Whemco’s incomplete answers to Question 12 of Set IV and Question 11 of Set V. In support of this Further Motion, Duquesne Light States as follows:

I. INTRODUCTION

1. On December 23, 2014, Whemco filed the above-captioned Complaint with the Pennsylvania Public Utility Commission (“Commission”) alleging that Duquesne Light

improperly eliminated Rider No. 5 Time-of-Day Discounts (“Rider No. 5”) from the Company’s tariff.

2. On January 21, 2015, Duquesne Light filed its Answer and New Matter to Whemco’s Complaint. In its Answer and New Matter, Duquesne Light denied the substantive averments of Whemco’s Complaint and explained that the elimination of Rider No. 5 was lawful and in compliance with applicable Commission orders.

3. On February 10, 2015, Whemco filed an Answer to Duquesne Light’s New Matter.

4. A prehearing conference was held before the ALJ on May 7, 2015.

5. On July 1, 2015, Duquesne Light and Whemco filed competing Motions for Summary Judgment.

6. On July 21, 2015, Duquesne Light and Whemco filed Answers to the respective Motions for Summary Judgment.

7. On September 10, 2015, the ALJ issued Interim Orders denying Duquesne Light’s and Whemco’s Motions for Summary Judgment.

8. A further prehearing conference was held before the ALJ on January 8, 2016.

9. On January 19, 2016, Whemco served the direct testimony of Pamela C. Polacek, Christian Slingluff and Robert A. Rosenthal.

10. Duquesne Light conducted the depositions of all three Whemco witnesses on February 9, 10 and 24, 2016.

11. The parties have engaged, and continue to engage, in discovery throughout this proceeding.

12. On February 23, 2016, Duquesne Light served its Set IV Discovery and Set V Discovery on Whemco.

13. On March 3, 2016, Whemco filed its objections to Question 11 of the Set IV Discovery and Questions 9, 19 and 26 of the Set V Discovery.

14. The parties were unable to reach a compromise regarding these discovery requests. Therefore, Duquesne Light filed a Motion to Dismiss Objections and Compel Whemco's Responses on March 14, 2016.

15. Also on March 14, 2016, Whemco filed its responses to the Set IV Discovery and Set V Discovery, noting its outstanding objections with respect to Question 11 of Set IV and Questions 9, 19(a) and 26 of Set V. As explained below, Whemco's responses to Question 12 of the Set IV Discovery and Question 11 of the Set V Discovery were non-responsive and/or not full and complete as is required by the Commission's regulations. Copies of Whemco's responses to Question 12 of the Set IV Discovery and Question 11 of the Set V Discovery are attached hereto as Appendix A.

16. On March 18, 2016, Whemco filed an answer to Duquesne Light's March 14, 2016 Motion to Compel.

17. Duquesne Light hereby files its Further Motion to Compel Whemco to fully and completely respond to Question 12 of the Set IV Discovery and Question 11 of Set V Discovery.

A. WHEMCO SHOULD NOT BE PERMITTED TO ASSERT PRIVILEGE WITH RESPECT TO THE 9/21/2010 AND 1/6/2011 EMAILS LISTED IN THE PRIVILEGE LOG PROVIDED IN RESPONSE TO QUESTION 12 OF THE SET IV DISCOVERY.

18. Duquesne Light – Set IV Question 12 provides as follows:

To the extent that Whemco argues that the attorney-client privilege or attorney work-product doctrine applies to any of the questions asked in this Set IV discovery, provide a privilege log of all communications and/or documents. Include in the privilege log a

document identifying number, the date of the communication/document, the author of the communication/document, the recipient(s) of the communication/document, a summary of all subjects of the communication/document, a designation of the privilege that is being claimed for each communication/document and the reasons why Whemco believes the communication/document is privileged.

19. In response to Question 12, Whemco provided a list of documents and stated, “all Documents referenced in this Privilege Log are claimed as privileged as attorney client communications or as attorney client work product.” See Appendix A. Among that list are two entries described as follows:

Date	Nature of Document	To/From Whom	General Subject Matter
9/21/2010	Email	From P. Polacek to C. Slingluff	Duquesne 2010 rate case
1/6/2011	Email	From P. Polacek to C. Slingluff	New DLC rates for Rate L, effective 4/1/11

20. Duquesne Light disagrees that these documents are subject to the attorney client privilege. The privilege log provided by Whemco identifies both documents as containing information provided by Ms. Polacek to Whemco regarding Duquesne Light’s 2010 base rate case. Ms. Polacek testified at her deposition that she did not represent Whemco in Duquesne Light’s 2010 base rate case. (Polacek Deposition Tr., pp. 10-12.) Therefore, no attorney client relationship existed between Ms. Polacek and Whemco with respect to Duquesne Light’s 2010 base rate case, and Whemco cannot claim privilege to avoid disclosing these documents.

21. The 9/21/2010 email and the 1/6/2011 email are not subject to privilege and Whemco and Ms. Polacek should be directed to provide full and complete copies of these documents and any responses thereto.

B. WHEMCO SHOULD BE COMPELLED TO PROVIDE A FULL AND COMPLETE RESPONSE TO SET V, QUESTION 11.

22. Duquesne Light Set V, Question 11 provides as follows:

Identify all individual cost savings that Whemco achieved by moving its melting to on-peak hours. Identify each cost saving by type of cost, amount saved and time period for each individual cost saving.

23. Whemco's response to Question 11 provides "hypothetical" data for the categories "melt crew," "hours earlier," "hourly savings" and "average melt days" to arrive at a hypothetical "estimated" monthly cost savings. See Appendix A.

24. Whemco did not object to Question 11 of the Set V Discovery; therefore, Whemco must fully and completely answer Question 11.

25. Whemco has not provided a full and complete response to Question 11. The question requests the actual individual cost savings experienced by Whemco by moving its melting operations to on-peak hours, not an estimated savings based on hypothetical data. Whemco has failed to provide the actual individual cost savings required by the question.

26. Whemco should be required to fully and completely respond to Question 11 as required by 5.342(a)(4) by producing the actual cost savings Whemco experienced.

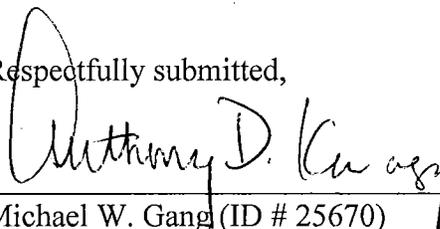
II. CONCLUSION

WHEREFORE, for the foregoing reasons, Duquesne Light Company respectfully requests that Administrative Law Judge Jeffrey A. Watson grant this Further Motion to Compel and order Whemco Steel Castings, Inc. to fully answer Question 12 of the Set IV Discovery and Question 11 of the Set V Discovery.

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Date: March 24, 2016

Respectfully submitted,



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Attorneys for Duquesne Light Company

Appendix A

Docket No. C-2014-2459527
Respondent: Pamela Polacek, Esquire
Position: Attorney, McNees Wallace &
Nurick LLC

WHEMCO-Steel Castings, Inc.
Response to Duquesne Light Company
Interrogatories and Requests for Production
Of Documents, Set IV – 12

No. 12 - To the extent that Whemco argues that the attorney-client privilege or attorney work-product doctrine applies to any of the questions asked in this Set IV discovery, provide a privilege log of all communications and/or documents. Include in the privilege log a document identifying number, the date of the communication/document, the author of the communication/document, the recipient(s) of the communication/document, a summary of all subjects of the communication/document, a designation of the privilege that is being claimed for each communication/document and the reasons why Whemco believes the communication/document is privileged.

Response:

See Attachment Duquesne Interrogatory Set IV – 12.

Attachment

Duquesne Set IV – 12

All documents referenced in this Privilege Log are claimed as privileged as attorney client communications or as attorney work product.

PRIVILEGE LOG			
Date	Nature of Document	To/From Whom	General Subject Matter
9/21/2010	Email	From P. Polacek to C. Slingluff	Duquesne 2010 rate case
Dec - 2010	McNees billing records		For services performed for WHEMCO
12/13/2010	Email	From P. Polacek to C. Slingluff, c: B. Heck	Re Rider 05 WHEMCO-Midland
12/13/2010	Email	From C. Slingluff to P. Polacek	Re Rider 05 WHEMCO/Midland
12/13/2010	Email	From P. Polacek to C. Slingluff, c: B. Heck	Re HVPS
1/4/2011	Email	From P. Polacek to C. Slingluff	Re Distribution rates, Rule 4
1/4/2011	Email	From C. Slingluff to P. Polacek	Re Distribution rates, Rule 4
1/6/2011	Email	From P. Polacek to C. Slingluff	New DLC rates for Rate L, effective 4/1/11
1/7/2011	Email	From P. Polacek to C. Slingluff	Re information for DLC letter
1/7/2011	Email	From P. Polacek to C. Slingluff	Re draft Rule 4 letter to Duquesne
5/6/2011	Email	From C. Slingluff to P. Polacek, c: B. Heck	Re economic delvelopment data
8/2/2011	Email	From P. Polacek to C. Slingluff	Re Economic Development
8/2/2011	Email	From P. Polacek to C. Slingluff	Re Economic Development Rider
8/19/2011	Email	From C. Slingluff to P. Polacek	Economic Development Rider
8/22/2011	Email	From P. Polacek to C. Slingluff	Re Economic Development Rider
8/22/2011	Email	From P. Polacek to C. Slingluff	Economic Development Rider
10/16/2012	Email	From C. Slingluff to P. Polacek	Midland electric calculation
10/22/2012	Email	From P. Polacek to C. Slingluff, c: C. Novelli	Midland electric calculation
10/24/2012	Email	From P. Polacek to C. Slingluff, c: C. Novelli	Draft Rule 4 letter to Duquesne re HVPS and/or Rule 4 contract
10/26/2012	Email	From P. Polacek to C. Slingluff	WHEMCO letter to W. Pfrommer
10/26/2012	Email	From P. Polacek to S. Russo, c: C. Slingluff	WHEMCO letter to W. Pfrommer
11/2/2012	Email	From C. Slingluff to P. Polacek	Number of employees at Midland
2/26/2013	Email	From C. Slingluff to R. Bertram	Confidentiality Agreement; Rates and Rider for Midland
3/21/2013	Email	From C. Slingluff to P. Polacek, C. Novelli, C. Maskiewicz, B. Heck, D. Flaherty	WHEMCO meeting with Duquesne
5/14/2013	Handwritten Notes	P. Polacek	Re WHEMCO/DLC meeting
5/16/2013	Email	From C. Slingluff to P. Polacek	Draft letter to Duquesne
5/20/2013	Email	From P. Polacek to C. Slingluff	Draft letter to Duquesne
5/23/2013	Email	From P. Polacek to D. Flaherty, C. Slingluff, c: C. Novelli, C. Maskiewicz, B. Heck	Re revised letter to Duquesne
5/23/2013	Email	From P. Polacek to C. Slingluff, c: C. Novelli	Re clean version of revised letter to Duquesne
8/12/2013	Email	From C. Slingluff to P. Polacek, c: D. Flaherty, C. Maskiewicz	Rule 4 contract
8/12/2013	Email	From C. Slingluff to P. Polacek, c: D. Flaherty, C. Maskiewicz	Requesting review of Rule 4 contract
8/14/2013	Email	From P. Polacek to C. Slingluff, c: D. Flaherty, C. Maskiewicz	Savings calculations
8/14/2013	Email	From C. Slingluff to P. Polacek, c: D. Flaherty, C. Maskiewicz	Savings calculations
8/14/2013	Email	From P. Polacek to C. Slingluff, c: D. Flaherty, C. Maskiewicz	Comments re contract, Rule 4
8/14/2013	Email	From P. Polacek to C. Slingluff, c: D. Flaherty, C. Maskiewicz	Comments on Rule 4 contract

Date	Nature of Document	To/From Whom	General Subject Matter
8/15/2013	Email	From C. Slingluff to C. Maskiewica, D. Flaherty, B. Heck, c: P. Polacek	Time for conference call
8/21/2013	Email	From P. Polacek to C. Slingluff	Re Rule 4 Contract
8/21/2013	Email	From P. Polacek to C. Slingluff	Re Rule 4 contract
8/29/2013	Email	From C. Slingluff to P. Polacek, c: C. Novelli, C. Maskiewicz, D. Flaherty, B. Heck	Review of changes to Duquesne contract
8/30/2013	Email	From P. Polacek to C. Slingluff, c: C. Novelli, C. Maskiewicz, D. Flaherty, B. Heck	Revised Agreement with Duquesne
8/30/2013	Email	From P. Polacek to B. Heck, c: C. Maskiewicz, D. Flaherty, K. Lantz, C. Slingluff, C. Novelli, D. Park, K. Park	Rule 4 contract
8/30/2013	Email	From B. Heck to P. Polacek, c: C. Maskiewicz, D. Flaherty, K. Lantz, C. Slingluff, C. Novelli	Re Rule 4 contract
9/3/2013	Email	From P. Polacek to C. Slingluff	Duquesne Confidentiality Agreement
9/3/2013	Email	From P. Polacek to K. Park, C. Slingluff	Re Rule 4 contract
9/5/2013	Email	From C. Slingluff to P. Polacek, c: C. Novelli, C. Maskiewicz, B. Heck, D. Park, K. Park	Re Rule 4 contract
9/6/2013	Email	From P. Polacek to C. Slingluff, c: C. Novelli, C. Maskiewicz, B. Heck, D. Park, K. Park	Re Rule 4 contract
10/8/2013	Email	From C. Slingluff to R. Bertram	Re Duquesne contract
10/16/2013	Emails	To: Rick Bertram, Teresa Schmittberger From: Pam Polacek	Re 2013 Rate Case
10/16/2013	Email	To: Rick Bertram, Teresa Schmittberger From: Pam Polacek	Re 2013 Rate Case
10/17/2013	Email	To: Rick Bertram From: Pam Polacek	Re 2013 Rate Case
10/18/2013	Email	From D. Flaherty to R. Bertram, C. Novelli, c: C. Slingluff	Re employment table
10/18/2013	Email	From C. Slingluff to P. Polacek, c: R. Bertram	Rule 4 contract
10/21/2013	Email	From P. Polacek to C. Slingluff, c: R. Bertram	Rule 4 contract
10/22/2013	Emails	To: Sally Russo From: Pam Polacek	Re 2013 Rate Case
10/22/2013	Email	From D. Flaherty to R. Bertram, c: C. Slingluff	Re written testimony in 2013 base rate case
10/22/2013	Email	From P. Polacek to R. Bertram, c: C. Slingluff, C. Novelli	Re Rule 4 negotiations
10/22/2013	Email	From P. Polacek to C. Slingluff, c: R. Bertram	Rule 4 contract
10/22/2013	Email	From C. Slingluff to P. Polacek, c: R. Bertram	Re Duquesne contract
10/23/2013	Email	From P. Polacek to R. Bertram, c: C. Slingluff	Rule 4 contract

Date	Nature of Document	To/From Whom	General Subject Matter
10/28/2013	Emails	To: Pam Polacek CC: Dan Park, Kevin Park, Charles Novelli, Daniel Flaherty, Chris Slingsluff From: Rick Bertram	Re 2013 Rate Case
10/29/2013	Emails	To: Jeff Pollock CC: Kitty Turner From: Pam Polacek	Re 2013 Rate Case
10/30/2013	Emails	To: Dan Park, Kevin Park, Chris Slingsluff, Daniel Flaherty, Chris Slingsluff CC: Jeff Pollock From: Pam Polacek	Re 2013 Rate Case
10/30/2013	Email	To: Pam Polacek From: Jeff Pollock	Re 2013 Rate Case
10/30/2013	Emails	To: Jeff Pollock CC: Kitty Turner From: Pam Polacek	Re 2013 Rate Case
10/30/2013	Emails	To: Rick Bertram From: Pam Polacek	Re 2013 Rate Case
11/1/2013	Emails	To: Dan Park, Kevin Park, Rob Bertram; Charles Novelli, Chris Slingsluff, Daniel Flaherty CC: Sally Russo, Teresa Schmittberger From: Pam Polacek	Re 2013 Rate Case
11/1/2013	Email	From P. Polacek to D. Park, K. Park, R. Bertram, C. Novelli, C. Slingsluff, D. Flaherty, c: T. Schmittberger	Re final testimony in Duquesne rate case
11/1/2013	Email	From P. Polacek to R. Bertram, D. Park, K. Park, C. Novelli, D. Flaherty, C. Slingsluff	US Steel testimony in Duquesne rate case
12/4/2013	Email	From P. Polacek to D. Flaherty, c: C. Slingsluff, D. Park, K. Park, R. Bertram	Re Surrebuttal testimony for Duquesne rate case
12/10/2013	Email	From P. Polacek to R. Bertram, C. Slingsluff and other industrial customers	Update on rate case settlement discussion
4/2/2014	Email	From P. Polacek to C. Slingsluff, c: D. Flaherty	Invoice calculation under new rates
4/2/2014	Email	From C. Slingsluff to P. Polacek, c: D. Flaherty	Invoice calculation under new rates
4/28/2014	Email	From P. Polacek to C. Slingsluff, C. Novelli, c: C. Maskiewicz, D. Flaherty, R. Carik, R. Bertram	Re Possible rate options
12/5/2014	Email	From R. Bertram to P. Polacek, c: K. Park	Re draft complaint
12/10/2014	Email	From P. Polacek to R. Bertram, K. Park	Re draft complaint
4/15/2015	Email	From C. Slingsluff to R. Bertram	Re WHEMCO visitor's register and Slingsluff's calendar
4/20/2015	Email	From T. Schmittberger to R. Bertram, c: P. Polacek	WHEMCO discovery responses
4/21/2015	Emails	Between C. Slingsluff and P. Polacek	Re Duquesne discovery
4/21/2015	Email	To: Rick Bertram, Chris Slingsluff CC: Teresa Schmittberger From: Pam Polacek	Affidavit

Date	Nature of Document	To/From Whom	General Subject Matter
4/21/2015	Email	To: Teresa Schmittberger From: Pam Polacek	Affidavit
4/21/2015	Email	To: Chris Slingluff CC: Teresa Schmittberger From: Pam Polacek	Affidavit
4/21/2015	Email	To: Rick Bertram, Chris Slingluff CC: Teresa Schmittberger From: Pam Polacek	Affidavit
4/21/2015	Email	To: Chris Slingluff CC: Rick Bertram From: Pam Polacek	Affidavit
4/21/2015	Email	To: Chris Slingluff CC: Sally Russo From: Pam Polacek	Affidavit
4/21/2015	Email	To: Chris Slingluff CC: Sally Russo From: Pam Polacek	Affidavit
4/21/2015	Email	To: Teresa Schmittberger CC: Pam Polacek From: Rick Bertram	Discovery
4/21/2015	Email	To: Rick Bertram CC: Pam Polacek From: Teresa Schmittberger	Discovery
4/21/2015	Email	To: Rick Bertram, Chris Slingluff From: Teresa Schmittberger	Discovery
4/21/2015	Email	To: Rick Bertram CC: Pam Polacek From: Teresa Schmittberger	Discovery
4/21/2015	Email	From C. Slingluff to R. Bertram	Re WHEMCO participation in Duquesne matters
4/21/2015	Email	From P. Polacek to C. Slingluff, c: Teresa Schmittberger	Re WHEMCO participation in Duquesne matters
4/21/2015	Email	From C. Slingluff to P. Polacek, c: S. Russo	Re WHEMCO participation in Duquesne matters
4/21/2015	Email	From P. Polacek to C. Slingluff, c: S. Russo	Re WHEMCO participation in Duquesne matters
4/21/2015	Email	From C. Slingluff to P. Polacek	Re WHEMCO participation in Duquesne
4/21/2015	Email	From C. Slingluff to R. Bertram	Re receipt of documents
4/21/2015	Email	From R. Bertram to C. Slingluff	Re written correspondence from Duquesne
4/21/2015	Email	From C. Slingluff to R. Bertram	Re number of Midland employees
4/21/2015	Email	From C. Slingluff to P. Polacek, c: R. Bertram	Re Economic Development Rider
4/21/2015	Email	From P. Polacek to R. Bertram, C. Slingluff, c: T. Schmittberger	Re Economic Development Rider
4/21/2015	Email	From R. Bertram to P. Polacek, C. Slingluff	Rule 4 contract
4/21/2015	Email	From P. Polacek to C. Slingluff, c: R. Bertram	Re Economic Development Rider
4/21/2015	Email	From P. Polacek to R. Bertram, C. Slingluff, c: T. Schmittberger	Re Economic Development Rider
4/23/2015	Email	To: Rick Bertram CC: Pam Polacek From: Teresa Schmittberger	Discovery
4/23/2015	Email	To: Rick Bertram From: Teresa Schmittberger	Discovery
4/23/2015	Email	To: Rick Bertram CC: Pam Polacek From: Teresa Schmittberger	Discovery
4/23/2015	Email	From R. Bertram to A. Seltzer	Documents from 2011-2013

Date	Nature of Document	To/From Whom	General Subject Matter
4/23/2015	Email	From T. Schmittberger to R. Bertram, c: P. Polacek	Documents from 2011-2013
5/13/2015	Email	From C. Slingluff to J. Povilaitis, c: R. Bertram, A. Seltzer	Rule 4 Chronology
5/13/2015	Email	From J. Povilaitis to C. Slingluff, c: R. Bertram, A. Seltzer	Chronology of Draft agreements
5/14/2015	Email	From C. Slingluff to J. Povilaitis, c: R. Bertram, A. Seltzer	Rule 4 Chronology
6/18/2015	Email	To: Theresa Gillis, Alan Selzer CC: John Povilaitis From: Pam Polacek	Affidavit
6/18/2015	Email	To: Alan Seltzer, CC: John Povilaitis, From: Pam Polacek	Affidavit
6/18/2015	Email	To: Alan Seltzer, CC: John Povilaitis, From: Pam Polacek	Affidavit
6/18/2015	Email	To: Alan Seltzer CC: Pam Polacek, John Povilaitis From: Theresa Gillis	Affidavit
6/18/2015	Email	To: Theresa Gillis CC: Pam Polacek, John Povilaitis From: Alan Seltzer	Affidavit
6/18/2015	Email	To: Pam Polacek CC: John Povilaitis From: Alan Seltzer	Affidavit
6/18/2015	Email	To: Pam Polacek CC: John Povilaitis From: Alan Seltzer	Affidavit
6/25/2015	Email	To: Harvey Freedenberg From: Pam Polacek	Affidavit
6/25/2015	Email	To: Alan Seltzer, CC: John Povilaitis, From: Pam Polacek	Affidavit
6/25/2015	Email	To: Alan Seltzer, CC: John Povilaitis, From: Pam Polacek	Affidavit
6/25/2015	Email	To: John Povilaitis, CC: Alan Seltzer, From: Pam Polacek	Affidavit
6/25/2015	Email	To: Pam Polacek From: Teresa Schmittberger	Discovery
6/25/2015	Email	To: Pam Polacek From: Teresa Schmittberger	Discovery
6/29/2015	Email	To: Pam Polacek, John Povilaitis, Alan Seltzer, CC: Rick Bertram, Chris Slingluff From: Pam Polacek	Affidavit
6/29/2015	Email	To: John Povilaitis, Alan Seltzer, CC: Rick Bertram, Chris Slingluff From: Pam Polacek	Affidavit
6/29/2015	Email	To: Pam Polacek, John Povilaitis CC: Rick Bertram, Chris Slingluff From: Alan Seltzer	Affidavit
R. Bertram documents	Draft Letter	To William Pfrommer	Re request for conversion to Rate HVPS and/or Rule 4 contract
	Chart		Electric costs in West Penn territory
	Draft Contracts		Electric Service Contracts with Duquesne
	Draft Agreement		Redlined Confidentiality Agreement
	Notes		Notes on meeting with Duquesne

Docket No. C-2014-2459527
Respondent: Christian Slingsluff
Position: Manager Purchasing

WHEMCO-Steel Castings, Inc.
Response to Duquesne Light Company
Interrogatories and Requests for Production
of Documents, Set V – 11

No. 11 - Identify all individual cost savings that Whemco achieved by moving its melting to on-peak hours. Identify each cost saving by type of cost, amount saved and time period for each individual cost saving.

Response:

See Attachment Duquesne Interrogatory Set V-11.

Attachment

Duquesne Set V – 11

**Attachment
Duquesne Set V - 11**

- Monthly Shift Savings

Hypothetical

Melt Crew 10

Hours Earlier 2

Hourly Savings \$ 0.05

Total Daily Savings \$ 1.00

Average Melt Days 21

Estimated Monthly Savings \$ 21.00