



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

June 18, 2018

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

Re: Pennsylvania Public Utility Commission v.
Duquesne Light Company – 1308(d) Proceeding
Docket Nos. R-2018-3000124
R-2018-3000829

Dear Mr. Gang:

Enclosed please find two (2) copies of the Bureau of Investigation and Enforcement's (I&E) Interrogatory, **I&E-RE-59**. Please restate the Interrogatory before responding. The response should identify the responding person(s).

The response to this Interrogatory is due within ten (10) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please provide two (2) copies of your responses and forward them to me at Post Office Box 3265, Harrisburg, PA 17105-3265.

If you have any questions, please contact me at (717) 787-8754.

Sincerely,

Gina L. Miller
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney I.D. #313863

John M. Coogan
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney I.D. #313920

GLM/JMC/wsf
Enclosure

cc: Certificate of Service
Secretary Chiavetta (Cover Letter and COS only)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2018-3000124
	:	R-2018-3000529
Duquesne Light Company	:	
1308(d) Proceeding	:	

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatory** dated June 18, 2018, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

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**Instructions For Answers To Bureau of Investigation and Enforcement
Interrogatories**

1. These Bureau of Investigation and Enforcement (I&E) Interrogatories shall be deemed to be continuing. The Respondent is obliged to change, supplement and correct all answers to these interrogatories to conform to reasonably available information, including such information as becomes available to the Respondent after answers are filed.

2. Each answer should first restate the question asked and should also identify the person(s) supplying the information that constitutes any and all portions of the subject answer. If more than one person is listed, the primary sponsoring witness, for purposes of potential cross-examination at hearing, should be specifically identified.

3. All requested information within the knowledge, possession, control or custody of Respondent or that which may be reasonably ascertained by Respondent is to be provided. Specific references to the company or corporate name(s) or "the Company," or "you," as used herein includes agents, employees or other representatives.

4. As used herein, the word "document" or "workpaper" includes, but is not limited to, the original and/or all copies of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, e-mail messages, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including electronic hard disks, floppy disks, CD, internet resources and/or magnetic media.

BUREAU OF INVESTIGATION & ENFORCEMENT INTERROGATORIES

DUQUESNE LIGHT COMPANY

Docket No. R-2018-3000124

Analyst: Christopher Keller

I&E-RE-59

Reference DLC's letter to Rosemary Chiavetta, Secretary dated May 18, 2018 and DLC Exhibits RLO-5 and RLO-6. Provide an update for all schedules for each of the following exhibits to reflect the changes due to the filed errata:

- A. DLC Exhibit 2,
- B. DLC Exhibit 3;
- C. DLC Exhibit 4.