



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

November 3, 2020

***Via Electronic Mail***

Kenneth M. Kulk, Esq.  
Mark A. Lazaroff, Esq.  
Catherine G. Vasudevan, Esq.  
Morgan Lewis & Bockius, LLP  
1701 Market Street  
Philadelphia, PA 19103

Anthony E. Gay, Esq.  
Jack R. Garfinkle, Esq.  
Brandon J. Pierce, Esq.  
PECO Energy Company  
2301 Market Street  
P.O. Box 8699  
Philadelphia, PA 19101

Re: Pennsylvania Public Utility Commission v.  
PECO Energy Company – Gas Division  
Docket No.: R-2020-3018929  
**I&E Interrogatories**

Dear Counsel:

Enclosed please find a copy of the Bureau of Investigation & Enforcement's (I&E) **Interrogatories I&E-RE (nos 51 through 85) - Patel**. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to these Interrogatories are due within fifteen (15) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please provide your responses and forward them via email to [sgranger@pa.gov](mailto:sgranger@pa.gov).

Copies are being served on parties of record per the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic service.* Should you have any questions, please do not hesitate to contact me.

Sincerely,

Scott B. Granger  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 63641

SBG/jfm  
Enclosures

cc: Secretary Rosemary Chiavetta (*Cover letter and Certificate of Service only – via e-file*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No.: R-2020-3018929  
 :  
 PECO Energy Company – Gas Division :

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Interrogatories** dated November 3, 2020, in the manner and upon the persons listed below.

**Served via Electronic Mail Only**

Anthony E. Gay, Esq.  
Jack R. Garfinkle, Esq.  
Brandon J. Pierce, Esq.  
PECO Energy Company  
2301 Market Street, Suite 15  
P.O. Box 8699  
Philadelphia, PA 19103  
[anthony.gay@exeloncorp.com](mailto:anthony.gay@exeloncorp.com)  
[jack.garfinkle@exeloncorp.com](mailto:jack.garfinkle@exeloncorp.com)  
[brandon.pierce@exeloncorp.com](mailto:brandon.pierce@exeloncorp.com)  
*Counsel for PECO*

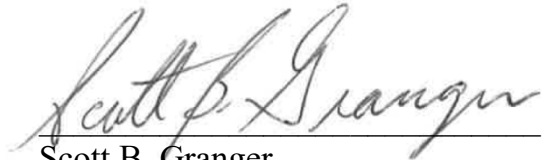
Phillip D. Demanchick, Esq.  
Christy M. Appleby, Esq.  
Barrett C. Sheridan, Esq.  
Laura J. Antinucci, Esq.  
Darryl A. Lawrence, Esq.  
Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101-1923  
[PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)  
[CAappleby@paoca.org](mailto:CAappleby@paoca.org)  
[BSheridan@paoca.org](mailto:BSheridan@paoca.org)  
[LANtinucci@paoca.org](mailto:LANtinucci@paoca.org)  
[DLawrence@paoca.org](mailto:DLawrence@paoca.org)

Elizabeth R. Marx, Esq.  
John W. Sweet, Esq.  
Ria M. Pereira, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)  
*Counsel for CAUSE-PA*

Steven C. Gray  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor, Forum Place  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

Robert D. Knecht  
Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)  
*Consultant for OSBA*

Glenn Watkins  
Technical Associates, Inc.  
6377 Mattawan Trail  
P.O. Box 1690  
Mechanicsville, VA 23116  
[ocapecoga2020@paoca.org](mailto:ocapecoga2020@paoca.org)  
*Consultant for OCA*

A handwritten signature in cursive script, reading "Scott B. Granger". The signature is written in black ink and is positioned above a horizontal line.

Scott B. Granger  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 63641