

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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November 5, 2020

**Via Electronic Mail Only**

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

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

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set IV, Set V, and Set VI 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 consultants, as listed below:

Kevin W. O'Donnell  
Nova Energy Consultants, Inc.  
1350 SE Maynard Road  
Suite 101  
Cary, NC 27511  
E-Mail: [OCAPECOGAS2020@paoca.org](mailto:OCAPECOGAS2020@paoca.org)

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November 5, 2020  
Page 2

Lafayette K. Morgan  
Exeter Associates, Inc.  
10480 Little Patuxent Pkwy  
Suite 300  
Columbia, MD 21044-3575  
E-Mail: [OCAPECOGAS2020@paoca.org](mailto:OCAPECOGAS2020@paoca.org)

Roger D. Colton  
Fisher, Sheehan, & Colton  
34 Warwick Road  
Belmont, MA 02478  
E-Mail: [OCAPECOGAS2020@paoca.org](mailto:OCAPECOGAS2020@paoca.org)

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/ Phillip D. Demanchick  
Phillip D. Demanchick  
Assistant Consumer Advocate  
PA Attorney I.D. # 324761  
E-Mail: [PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service only)  
Certificate of Service  
\*298893

CERTIFICATE OF SERVICE

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

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

Dated this 5<sup>th</sup> day of November 2020.

**SERVICE BY E-MAIL ONLY**

Scott B. Granger, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Steven C. Gray, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17109-1923

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

Charis Mincavage, Esquire  
Adeolu A. Bakare, Esquire  
Jo-Anne S. Thompson, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

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Elizabeth R. Marx, Esquire  
John W. Sweet, Esquire  
Ria M. Pereira, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

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Dated: November 5, 2020  
\*298892