

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 2, 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 XIII, in the above referenced proceeding.

In accordance with the discovery modifications discussed at the November 9th Prehearing Conference, we request that the Company provide verified answers to these inquiries within ten (10) 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:

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)

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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/ Laura J. Antinucci  
Laura J. Antinucci  
Assistant Consumer Advocate  
PA Attorney I.D. # 327217  
E-Mail: [LAntinucci@paoca.org](mailto:LAntinucci@paoca.org)

Enclosures:

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

\*300243

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 XIII, 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 2<sup>nd</sup> day of December 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  
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Adeolu A. Bakare, Esquire  
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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

/s/ Laura J. Antinucci

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Dated: December 2, 2020

\*300242