



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

January 7, 2021

**Via Electronic Mail**

Kenneth M. Kulak, Esq.  
Mark A. Lazaroff, Esq.  
Catherine G. Vasudevan, Esq.  
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  
**I&E Interrogatory Responses**

Dear Counsel:

Enclosed please find the **Responses of the Bureau of Investigation and Enforcement (I&E) to the Interrogatories of PECO Energy Company Set II (nos. 1 & 2) – Patel.**

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  
(717) 425-7593  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

SBG/ac  
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 **Interrogatory Responses** dated January 7, 2021, in the manner and upon the persons listed below.

**Served via Electronic Mail Only**

Kenneth M. Kulak, Esq.  
Mark A. Lazaroff, Esq.  
Catherine G. Vasudevan, Esq.  
Morgan, Lewis & Bockius, LLP  
1701 Market Street  
Philadelphia, PA 19103  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
*Counsel for PECO*

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  
[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  
[OCAPECOGAS2020@paoca.org](mailto:OCAPECOGAS2020@paoca.org)

Steven C. Gray  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101-1923  
[sgray@pa.gov](mailto:sgray@pa.gov)

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*

Charis Mincavage, Esq.  
Adeolu A. Bakare, Esq.  
Jo-Anne S. Thompson, Esq.  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[jthompson@mcneeslaw.com](mailto:jthompson@mcneeslaw.com)  
*Counsel for PAIEUG*

Glenn Watkins  
Technical Associates, Inc.  
6377 Mattawan Trail  
P.O. Box 1690  
Mechanicsville, VA 23116  
[OCAPECOGAS2020@paoca.org](mailto:OCAPECOGAS2020@paoca.org)  
*Consultant for OCA*

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

Lafayette K. Morgan  
Exeter Associates  
10480 Little Patuxent Parkway, Suite 300  
Columbia, MD 21044-3575  
[OCAPECOGAS2020@paoca.org](mailto:OCAPECOGAS2020@paoca.org)  
*Consultant for OCA*

Roger D. Colton  
Fisher Sheehan & Colton  
34 Warwick Road  
Belmont, MA 02478  
[OCAPECOGAS2020@paoca.org](mailto:OCAPECOGAS2020@paoca.org)  
*Consultant for OCA*

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

Mr. Jeffrey Pollock  
J. Pollock Inc.  
12647 Olive Boulevard, Suite 585  
St. Louis, MO 63141  
[jcp@jpollockinc.com](mailto:jcp@jpollockinc.com)  
*Consultant for PAIEUG*

Mitchell Miller  
Mitch Miller Consulting LLC  
60 Geisel Road  
Harrisburg, PA 17112  
[mitchmiller77@hotmail.com](mailto:mitchmiller77@hotmail.com)  
*Witness for OSBA*



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