



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

January 11, 2021

**Via Electronic Mail**

Kenneth M. Kulak  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
[Ken.kulak@morganlewis.com](mailto:Ken.kulak@morganlewis.com)

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

Dear Counsel:

Enclosed please find the following **Responses of the Bureau of Investigation and Enforcement (I&E) to the Interrogatories of PECO Energy Company Set IV:**

- **I&E Responses to PECO Set IV (nos -1-9) – Bozhko w/Attachment - CONFIDENTIAL**

Consistent with Paragraph 8 of the Commission's March 20, 2020 Emergency Order at Docket No. M-2020-3019262 (Re: Suspension of Regulatory and Statutory Deadlines; Modification to Filing and Service Requirements), electronic copies only are being served on all active parties of record as evidenced in the attached Certificate of Service. If you have any questions, please contact [sgranger@pa.gov](mailto:sgranger@pa.gov).

Sincerely,

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

SBG/jfm  
Enclosures

cc: Secretary Chiavetta (*Cover Letter & COS only, via e-filing*)  
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** on January 11, 2021, in the manner and upon the persons listed below:

**Served via Electronic Mail Only**

**PROPRIETARY VERSION**

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*

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*

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*

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*

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)

### **NON-PROPRIETARY VERSION**

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*


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

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

Roger D. Colton  
Fisher Sheehan & Colton  
34 Warwick Road  
Belmont, MA 02478  
[ocapecogas2020@paoca.org](mailto:ocapecogas2020@paoca.org)  
*Consultant for OCA*

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

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

A handwritten signature in cursive script that reads "Scott B. Granger". The signature is written in dark ink and is positioned above a horizontal line.

---

Scott B. Granger  
Prosecutor  
PA Attorney ID No. 63641