

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Harrisburg, Pennsylvania 17101-1923
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FAX (717) 783-7152
consumer@paoca.org

January 27, 2021

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 XVIII, 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

Kenneth M. Kulak, Esquire
Mark A. Lazaroff, Esquire
Catherine G. Vasudevan, Esquire
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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

Enclosures:

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

*303097

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 XVIII, 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 27th day of January 2021.

SERVICE BY E-MAIL ONLY

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

Steven C. Gray, Esquire
Office of Small Business Advocate
555 Walnut Street
1st 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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P.O. Box 8699
Philadelphia, PA 19101

Charis Mincavage, Esquire
Adeolu A. Bakare, Esquire
Jo-Anne S. Thompson, Esquire
McNees Wallace & Nurick LLC
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Ria M. Pereira, Esquire
Pennsylvania Utility Law Project
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Harrisburg, PA 17101

/s/ Laura J. Antinucci

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Dated: January 27, 2021
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