

(Note: To correct edit errors on the previous submission of documents related to Interrogatories Set II.)

Richard C. Culbertson

1430 Bower Hill Road

Pittsburgh, PA 15243

(609) 410-0108

[Richard.c.culbertson@Gmail.com](mailto:Richard.c.culbertson@Gmail.com)

June 7, 2021

**Via Electronic Mail Only**

Michael W. Hassell, Esquire

Lindsay A. Berkstresser, Esquire

Post & Schell, P.C.

17 North Second Street, 12th Floor

Harrisburg, PA 17101-1601

Re: Pennsylvania Public Utility Commission

v.

Columbia Gas of Pennsylvania, Inc.

Docket No. R-2021-3024296

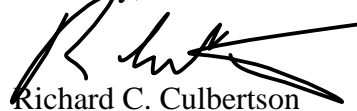
Dear Counsel:

Attached are my interrogatories for Set II, in the above referenced proceeding.

In accordance with the discovery modifications discussed at the May 17th Prehearing Conference, I 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. I would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

If you have any questions, please call me. 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 have been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,



Richard C. Culbertson

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service only) Certificate of Service. eFiling Confirmation Number **2180513**

## CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :  
:  
v. : Docket No. R-2021-3024296  
:  
Columbia Gas of Pennsylvania, Inc. :

I hereby certify that I have this day served a true copy of the following document, to Columbia Gas of Pennsylvania, Inc., Richard C. Culbertson Set II, 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 7<sup>th</sup> day of June 2021.

### **SERVICE BY E-MAIL ONLY**

Erika L. McLain, 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

Michael W. Hassell, Esquire  
Lindsay A. Berkstresser, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601

Amy E. Hirakis, Esquire  
NiSource Corporate Services Co.  
800 North Third Street  
Suite 204  
Harrisburg, PA 17102

Theodore J. Gallagher, Esquire  
Columbia Gas of Pennsylvania, Inc.  
121 Champion Way  
Suite 100  
Canonsburg, PA 15317

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

Joseph L. Vullo, Esquire  
PA Weatherization Providers Task Force, Inc.  
1460 Wyoming Avenue  
Forty Fort, PA 18704

Todd S. Stewart, Esquire  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101

Charis Mincavage, Esquire  
Kenneth R. Stark, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

Richard C. Culbertson  
1430 Bower Hill Road  
Pittsburgh, PA 15243  
Richard.c.culbertson  
@gmail.com  
609-410-0108

Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
E-Mail: [HBreitman@paoca.org](mailto:HBreitman@paoca.org)

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

Darryl A. Lawrence  
I.D. # 93682  
E-Mail: [DLawrence@paoca.org](mailto:DLawrence@paoca.org)

Thomas J. Sniscak, Esquire  
Whitney E. Snyder, Esquire  
Bryce R. Beard, Esquire  
Hawke McKeon & Sniscak, LLP  
100 North Tenth Street  
Harrisburg, PA 17101

Barrett C. Sheridan  
Assistant Consumer Advocate  
PA Attorney I.D. # 61138  
E-Mail: [BSheridan@paoca.org](mailto:BSheridan@paoca.org)

Christy M. Appleby  
Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
E-Mail: [CAAppleby@paoca.org](mailto:CAAppleby@paoca.org)

Senior Assistant Consumer Advocate

Dated: June 7, 2021

eFiling Confirmation Number

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2021-3024296
	:	
Columbia Gas of Pennsylvania, Inc.	:	

---

INTERROGATORIES OF RICHARD  
C. CULBERTSON SET II

---

Pursuant to 52 Pa. Code § 5.341, Richard C. Culbertson hereby propounds the following Interrogatories to Columbia Gas of Pennsylvania, Inc. (Columbia) to be answered by those officers, employees, agents, or contractors who have knowledge of the requested facts and who are authorized to answer on behalf of the company. Each interrogatory is to be verified by the responding witness in accordance with 52 Pa. Code § 5.342(a)(6).

DATED:      June 7, 2021

### Instructions

- 1) These interrogatories shall be construed as a continuing request. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as first becomes available to the Respondent after the answers hereto are filed.
- 2) Restate the interrogatory immediately preceding each response.
- 3) Identify the name, title, and business address of each person(s) providing each response.
- 4) Provide the date on which the response was created.
- 5) Divulge all information that is within the knowledge, possession, control, or custody of Respondent or may be reasonably ascertained thereby. The term "Columbia Gas of Pennsylvania, Inc.," "Columbia," "CPA", "CGP," "Company," or "you" as used herein includes Columbia Gas of Pennsylvania, Inc., its attorneys, agents, employees, contractors, or other representatives, to the extent that the CGP has the right to compel the action requested therein. This includes policy, procedures, directions, and the like from the parent company, NiSource, to which Columbia Gas of Pennsylvania is subject.
- 6) Verify by the responsible witness that all facts contained in the response are true and correct to the best of the witness' knowledge, information, and belief.
- 7) As used herein, but only to the extent not protected by 52 Pa. Code Section 5.323, the word "document" or "workpaper" includes, but is not limited to, the original and all copies in whatever form, stored or contained in or on whatever media or medium including computerized memory, magnetic, electronic, or optical media, regardless of origin and whether or not including additional writing thereon or attached thereto, and may consist of:
  - a) notations of any sort concerning conversations, telephone calls, meetings, or other communications;
  - b) bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires, and surveys;
  - c) worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments, and written comments concerning the foregoing.

