

Richard C. Culbertson
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July 6, 2021

Judge Hoyer,
Office of Administrative Law Judge
Piatt Place, Suite 220
301 Fifth Avenue
Pittsburgh, PA 15222

Re: Pennsylvania Public Utility Commission

v.

Columbia Gas of Pennsylvania, Inc.

Docket No. R-2021-3024296

Motion to Compel

Dear Judge Hoyer,

Attached is a motion to Compel Columbia Gas of Pennsylvania to submit responses to my interrogatories as written in Set IV.

Thank you for your consideration.

Sincerely,

Richard C. Culbertson

Attachments:

Interrogatories Sent to Columbia Gas of Pennsylvania -- initially sent

Certificate of Service.

Ms. Rosemary Chiavetta, Secretary Pennsylvania Public Utilities Commission
(Certificate of service only)

Sincerely,



Richard C. Culbertson

Richard.c.culbertson@Gmail.com

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, Certificate of Service. eFiling Confirmation
Number

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al.	:	R-2021-3024296
	:	
	:	
v.	:	
	:	
Columbia Gas of Pennsylvania, Inc.	:	

**MOTION TO COMPEL OBJECTIONS OF COLUMBIA GAS OF PENNSYLVANIA, INC. TO THE
INTERROGATORIES PROPOUNDED BY
RICHARD C. CULBERTSON – SET IV, QUESTIONS 1-31**

**So Columbia believes and wants Mr. Hicks’ sworn witness testimony to be judged irrelevant to
this rate case.**

On May 24, 2021, Richard C Culbertson Filed a Formal Complaint in Columbia Gas of Pennsylvania’s Rate Case R-2021-3024296 whereby Columbia requested an annual revenue increase of \$98,300,000. The presiding officer assigned is the honorable Mark A. Hoyer Deputy Chief Administrative Law Judge.

On June 21st Interrogatories Set IV with Questions 1- 31 were submitted to Columbia Gas of Pennsylvania through their attorneys. Columbia responded, with non-specific objections to each one. In addition, before submitting, there was no communication to resolve or clarify the questions or requests for documents.

This set of interrogatories are about safety, private property rights, perceived abuse, customer dissatisfaction, operations outside of jurisdictional authority, customer treatment, and internal problem resolutions that were provided in the Public Input Hearing ... all as they impact just and reasonable rates.

This interrogatory set is not about Mr. Hicks of Uniontown who was only one of three that provided sworn testimony and made his experience public.

The sworn public comments that Mr. Hicks provided are in the public record of this rate case. When questionable experiences are provided in sworn testimony in a rate case by a creditable witness, those experiences beg to be investigated. They must be investigated.

Columbia in effect, is stating to the participants in this rate case – Mr. Hicks' experience with Columbia is none of the business of the participants of this rate case – don't go there and stay out of it. Keep it out of the "strands" that must be considered in this rate case. The PUC and others, like Mr. Hicks, need to be heard, his experience investigated, and appropriate action is taken. Undeserved harm to one customer becomes harm to all customers and the Commission.

The Commission has promised to protect customers from wrongful actions of a public utility in the PA Energy Consumer Bill of Rights – *"The right to be protected from unfair, deceptive, fraudulent and anti-competitive practices of providers of electric and natural gas service. Now is the time and this is the process for the Commission to protect consumers."*

A rate case is one of the few and maybe the only venue where individual customers can be heard by PUC officials. In fact, during scheduled Public PUC meetings – the customers will not be heard because they have already had their chance during the rate case public hearing.

2018 CHAPTER EIGHT - SENTENCING OF ORGANIZATIONS

<https://www.ussc.gov/guidelines/2018-guidelines-manual/2018-chapter-8> applies to organizations including traded corporations and governments. This document, which was required is intended to prevent and detect wrongdoing.

The PUC is the supervisor of Columbia by Pennsylvania law -- Title 66 § 501 (b). and (a) *"it shall be its duty to enforce"*. Supervisors have certain rights, duties, and authorities of which must be exercised.

*"An individual **"condoned"** an offense if the individual knew of the offense and did not take reasonable steps to prevent or terminate the offense."*

*An individual was **"willfully ignorant of the offense"** if the individual **did not investigate** the possible occurrence of unlawful conduct despite knowledge of circumstances that would lead a reasonable person to investigate whether unlawful conduct had occurred.*

So as participants, we know something may have gone wrong here – it is not the time to move on ... PUC officials have a responsibility for what is now in the record. I believe I do as well.

The sworn testimony provided information that wrongful actions may have occurred and should be investigated to determine if wrongdoing likely occurred by Columbia. Mr. Hicks deserves justice and so does Columbia.

Although I am not of the legal profession, but close, I spend a significant amount of time in standards writing, vetting, and promulgation, and try to adhere to relevant parts of PA Title 204 Chapter 81, 204 Pa Code Rule 6.1. Voluntary Pro Bono Publico Service, which is doing things for the public, interest, service, and good.

<http://www.pacodeandbulletin.gov/Display/pacode?file=/secure/pacode/data/204/chapter81/s6.1.html>

Per Judge Administrative Law Judge Katrina L. Dunderdale's **THIRD INTERIM ORDER, Denying Objections of Columbia Gas of Pennsylvania, Inc. to Portions of Public Input Testimony of Richard C. Culbertson**

*"All costs which a public utility uses to compute its base rate, including improvements to infrastructure and to safety, are relevant in a base rate proceeding. **In addition, safety specifically is always a relevant issue in a base rate proceeding.**"* These, of course, all fall under internal control issues.

This interrogatory was submitted in an attempt to right known and expressed wrongs.

Granted Mr. Hicks' testimony was an embarrassment to Columbia Gas of Pennsylvania. Mr. Hicks believed Columbia Gas did him wrong.

Instead of Mr. Hicks being warm in winter with safe natural gas, he was desperate to stay warm and has used among other things relatively unsafe kerosene heat.

Desperate people do desperate things.

From the U.S. Energy Department *"Unvented combustion units **are not recommended** for use inside your home, because they introduce unwanted combustion products into the living space—including nitrogen oxides, carbon monoxide, and water vapor—and deplete air in the space. Most states have banned*

unvented kerosene heaters for use in the home...”

<https://www.energy.gov/energysaver/home-heating-systems/portable-heaters>

Here again, Columbia is abusing the rate case process and refuses to participate in lawful discovery with various types of objections *“because they seek information that is (1) confidential customer information; (2) irrelevant and unlikely to lead to the discovery of admissible evidence; (3) outside the scope of this proceeding; (4) legal interpretations, strategy and argument; and (5) protected by attorney client privilege.”*

The interrogatories are summed up – what did you do to Mr. Hicks and why? This rate case needs to deal with questionable practices that may harm public safety and extremely high rates and charges and to find that out for the public good.

Some interrogatories are simply not covered by the objections. For example:

21. *Is inspecting a gas furnace heat exchanger include[d] in Columbia’s a covered task as provided in 49 CFR Part 192, Subpart N - Qualification of Pipeline Personnel?*

22. *How does an inspection of a privately owned gas furnace fall within 49 CFR § 192.801 – Scope?*

Obtaining the answers to these questions would take little time for Columbia’s operations and quality experts to answer. Columbia has a document that provides identified covered tasks, and the DOT regulations are readily available.

Working outside of the scope and jurisdiction of the gas company has allowable costs, training, compliance, and other concerns. A major concern is Constitutional, that of respecting other’s property rights provide by the Pennsylvania Constitution.

CONSTITUTION of the COMMONWEALTH OF PENNSYLVANIA, Article I -- WE DECLARE THAT-- § 1. Inherent rights of mankind. All ... have certain inherent and indefeasible rights, among which are those of enjoying and defending life and liberty, of acquiring, possessing and protecting property” ...

Was there trespassing involved? Were there violations of ***Title 66 § 501. General powers. (c) Compliance -- shall observe, obey, and comply?*** The public has a right to know.

We need to follow the rules and what is generally accepted in fair discovery. Columbia’s objections are consistent with recognized weaknesses and abuses of the old rules. The letter and spirit of the rules changed December 1, 2015, *Federal Rule of FEDERAL RULES OF CIVIL PROCEDURE*. <https://www.law.cornell.edu/rules/frcp> The Rules of Federal Procedure are

addressed in ‘Title 28, United States Code, <https://www.law.cornell.edu/uscode/text/28>

Rule 34. Producing Documents, Electronically Stored Information, and Tangible Things, or Entering onto Land, for Inspection and Other Purposes

(b) PROCEDURE. (1) Contents of the Request. The request: (A) must describe with reasonable particularity each item or category of items to be inspected; (b) PROCEDURE.

(2) Responses and Objections.

*(B) Responding to Each Item. For each item or category, the response must ... **state with specificity the grounds for objecting to the request, including the reasons.***

See Fischer v. Forrest, No. 1:2014cv01304 - Document 151 (S.D.N.Y. 2017) starting with page 4 Let us count the ways defendants have violated the Rules”
<https://law.justia.com/cases/federal/district-courts/new-york/nysdce/1:2014cv01304/424229/151/>

Columbia’s objections apply to each question, as opposed to specific objections.

Now, it is not good enough to provide several general reasons or boilerplate why the respondent is objecting. If Columbia believes a question or production of a document is “unduly burdensome” – it must specifically state, why it would be unduly burdensome – not of the opinion of advocates, but proportionality considerations and those who specifically understand the question and understand the undertaking and can provide estimates in time and cost.

There were significant reasons to retire portions of Rule 26 and 34 ... they were not adequately servicing justice they were impeding justice. That was recognized and changes were made. Referring to the elements in old rules that were deleted ... even in state courts it is inappropriate ... just not acting in good faith.

Let us deal with these general objections.

Nature of the Objections

*(1) **confidential customer information:** “Question 1. Please provide Columbia's records of service to Mr. Hicks' residence. **Do not include Mr. Hicks' personal information such as payment history.**”*

This is about Columbia’s treatment of some customers. Ratepayers who provided public testimony are not covered by a privacy law such as HIPAA for health care.

This question does not seek Mr. Hicks’ personal information. Mr. Hicks was only one of three out of ~430,000 customers who gave sworn public testimony was seeking help from the PUC and the participants to investigate what Columbia had done to him.

- In an investigation – what are the facts? The records of which Columbia is required to keep, may or may not substantiate Mr. Hicks’ sworn testimony.
- Facts cannot be obtained without requesting information
 - ABA’s professional standard applicable to lawyers – “*Rule 3.4: Fairness to an Opposing Party ... A lawyer shall not: (a) unlawfully obstruct another party's access to evidence to unlawfully alter, destroy or conceal a document or other material having potential evidentiary value. A lawyer shall not counsel or assist another person to do any such act;*”
 - *Title 66 § 312. Privilege and immunity. No person shall be excused from testifying or from producing any book, document, paper, or account in any investigation [a rate case is an investigation] or inquiry by, or hearing before, the commission ... or evidence, book, document, paper, or account required may tend to incriminate him or subject him to penalty or forfeiture.*
- The questions do not pertain to Mr. Hicks’ confidential information as instructed in Question 1. The question has everything to do with Columbia’s operations in the handling of Mr. Hicks. Did Columbia provide Mr. Hicks good service per laws, regulations, and the tariff? Was Mr. Hicks placed in harm's way improperly? Mr. Hicks believed so. “*[S]afety specifically is always a relevant issue in a base rate proceeding.*”
- Mr. Hicks provided sworn public comments, he could have remained silent, but did not. Mr. Hicks expected and wanted the rate case hearing to help serve justice and expose what Columbia had done to him. The first interrogatory specifically requested “Do not include Mr. Hicks' personal information such as payment history.” Mr. Hicks’ personal information is irrelevant – his experience with Columbia Gas is not.

(2) irrelevant and unlikely to lead to the discovery of admissible evidence:

- This boilerplate objection was eliminated with the update of Federal Rules of Civil Procedure 26, issued December 1, 2015. The current high-level requirement is “(1) ...Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party’s claim or defense and **proportional** to the **needs of the case**, considering the importance of the issues at stake in the action, the **amount in controversy**, the parties’

relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. Information within this scope of discovery need not be admissible in evidence to be discoverable."

<https://www.supremecourt.gov/publicinfo/year-end/2015year-endreport.pdf>

The Supreme Court changed The Federal Rules of Civil Procedure after a substantial vetting process starting in 2010 and it had 2,300 written comments and in hearing, it had 120 witnesses.

"They mark significant change, for both lawyers and judges, in the future conduct of civil trials.

The amendments may not look like a big deal at first glance, but they are."

- Admissibility in a given element of an interrogatory is no longer relevant.
- *"The amended rules, which can be viewed at <http://www.uscourts.gov/federal-rules-civil-procedure>, went into effect one month ago, on December 1, 2015. They mark significant change, for both lawyers and judges, in the future conduct of civil trials.*

The amendments may not look like a big deal at first glance, but they are.

It is recognized Federal and state courts can be different organizationally, but the substance of due process is very similar broad discovery privileges are shared in both, which is why the ABA has one Set IV Questions 1- 31 above.

See Fischer v. Forrest, No. 1:2014cv01304 - Document 151 (S.D.N.Y. 2017)
<https://law.justia.com/cases/federal/district-courts/new-york/nysdce/1:2014cv01304/424229/151/>

"The December 1, 2015 amendment to Rule 26(b)(1) limits discovery to material "relevant to any party's claim or defense . . ." Discovery about "subject matter" no longer is permitted. That the discovery is not "likely to lead to the discovery of relevant, admissible evidence." "The 2015 amendments deleted that language from Rule 26(b)(1), and lawyers need to remove it from their jargon."

Discovery in Pennsylvania is also subject to Rule 4009 PRODUCTION OF DOCUMENTS AND THINGS AND ENTRY FOR INSPECTION AND OTHER ACTIVITIES PRODUCTION OF DOCUMENTS AND THINGS GENERAL PROVISIONS. This rule in many respects was a forerunner of the Federal Rule 26 and Rule 34. Rule 4009 included a Proportionality Standard.

Rule 4009.11. Request Upon a Party for Production of Documents and Things.

Rule 4014 “If the objection is made, the reasons therefor shall be stated.”

52 § 5.321 PUBLIC UTILITY COMMISSION § 5.321. Scope (c) Scope. ... a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of a discoverable matter. **It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.**

Any perceived inconsistency in this area between the PA PUC rules and the PA Commonwealth rules would be resolved in favor of PA Rules as the PA PUC regulations must be “***not inconsistent with law***”. (Title 66 § 501. General powers.

(b) Administrative authority and regulations. --The commission shall have general administrative power and authority to supervise and regulate all public utilities doing business within this Commonwealth. **The commission may make such regulations, not inconsistent with law, as may be necessary** or proper in the exercise of its powers or for the performance of its duties.

(3) outside the scope of this proceeding:

Disturbing public testimony is relative and is within the scope of this rate case. Mr. Hicks thought he was abused. He was only one of three of the 430,000 customers or former customers who had the will and courage to testify. The answers to these interrogatories may tell if Mr. Hicks was abused. Abuses can lead to unreasonable costs and promote unsafe conditions. This rate case needs to find that out -- it is of the public interest.

Per Judge Administrative Law Judge Katrina L. Dunderdale’s **THIRD INTERIM ORDER, Denying Objections of Columbia Gas of Pennsylvania, Inc. to Portions of Public Input Testimony of Richard C. Culbertson**

*“All costs which a public utility uses to compute its base rate, including improvements to infrastructure and to safety, are relevant in a base rate proceeding. **In addition, safety specifically is always a relevant issue in a base rate proceeding.**”*

These interrogatories are not out of scope. Saying so does not make it so.

(4) legal interpretations, strategy and argument:

I cannot provide specific answers to nonspecific assertions.

The Federal, Pennsylvania, and PUC Civil Procedures provide wide latitude in shaping interrogatories. There are no constraints in providing understandable relevant interrogatories.

66Pa. C.S. **701. Complaints.**

*The commission, or any person, corporation, or municipal corporation **having an interest in the subject matter**, or any public utility concerned, may complain in writing, setting forth any act or thing done or omitted to be done by any public utility in violation, or claimed violation, of any law which the commission has jurisdiction to administer, or of any regulation or order of the commission.*

Follow-on questions shaped around the contents of an initial complaint are what the law expects from complainants.

To a large extent, interrogatories are consistent with audit requirements included in 49 CFR 192.7 - *What documents are incorporated by reference [IBR] partly or wholly in this part?*

(a) This part prescribes standards, or portions thereof, incorporated by reference

(5) ASME/ANSI B31.8S-2004, "Supplement to B31.8 on Managing System Integrity of Gas Pipelines," 2004, (ASME/ANSI B31.8S-2004),

A8 INCORRECT OPERATIONS THREAT A8.1 *Incorrect operations are defined in this context as incorrect operating procedures or failure to follow a procedure.*

Audits, investigations, and interrogatories require questions and answers. When incorrect operations are discovered – the nature of the discovery must be determined – weak procedures or weaknesses in following good procedures? Both should lead to corrective actions.

(5) protected by attorney client privilege

I cannot provide a specific answer to a nonspecific assertion. Keep in mind, however, employees of the legal department in Columbia/NiSource are employees and subject to the employee handbook entitled "Living Our Promise NISOURCE CODE OF BUSINESS CONDUCT" <https://www.nisource.com/docs/librariesprovider2/nisource-documents/nisource-policies/nisource-code-of-business.pdf?sfvrsn=77> and not all their work as an employee are covered

by attorney client privilege.

“If, in the course of our work, an action is not addressed in this Code, but nonetheless seems contrary to our core values or the law, we should not proceed. If anyone observes a questionable action, he or she should raise the issue without delay.”

“If anyone observes or becomes aware of actual or potential violations of any law, regulation or provision of this Code or Company policy, it is their responsibility to report the incident through the offered reporting methods found on page 7.

“INVESTIGATIONS

*It is the policy of the Company to ensure that allegations of ethics and compliance violations are investigated promptly, thoroughly, competently and, to the extent consistent with law and Company policies, confidentially. The policy also states that matters **must** be resolved consistently and **fairly**, and that appropriate matters are reported to senior management of the Company and the Board of Directors or its appropriate committees.”*

Testing a Company requirement is part of a normal audit process, there can be severe consequences when employees violate internal policy and appropriate people are not involved and not aware of vital issues of the Corporation. The issue is not what was reported, the issue - were they reported and resolved per company policy.

With knowledge comes responsibility – this concept is repeated in the law and searches for truth ‘What Did the President Know, and When Did He Know It?’. The U.S. Sentencing Commission’s Chapter 8 has 7 places where knew or know... is used. (Again this document applies to non-federal governments and other organizations and was required to be published by the Sarbanes Oxley law of 2002 to primarily deter crime. <https://www.ussc.gov/guidelines/2018-guidelines-manual/2018-chapter-8>

“Background: This section sets forth the requirements for an effective compliance and ethics program. This section responds to section 805(a)(5) of the Sarbanes-Oxley Act of 2002, Public Law 107–204, which directed the Commission to review and amend, as appropriate, the guidelines and related policy statements to ensure that the guidelines that apply to organizations in this chapter “are sufficient to deter and punish organizational criminal misconduct.””

(5) No person shall **knowingly** circumvent or **knowingly** fail to implement a system of internal accounting controls or knowingly falsify any book, record, or account described in paragraph (2). 15 U.S. Code § 78m - Periodical and other reports
<https://www.law.cornell.edu/uscode/text/15/78m>

The public needs to know the internal workings of Columbia in solving internal problems and how it treats customers.

The parties of this rate case also have a responsibility to investigate the testimony of a prior customer of Columbia Gas, who came forth to provide quality testimony under oath. We know what Mr. Hicks testified – his testimony is relevant and we as participants, have a responsibility to seek the truth.

Regardless of Columbia's objections to provide answers to applicable and relevant interrogatories, Columbia must be compelled to answer. If corrections to operations need to be made so, be it. If corrections or recognition of liabilities or unreasonable cost is discovered – also so, be it.

CONCLUSION

WHEREFORE, the interrogatories submitted to Columbia gas meet the rules of civil procedure, are part of due process, due diligence, and require answers or requested documents. They are also of the nature that required a good-faith response from Columbia Gas of Pennsylvania per the ABA Rule 3.4: *Fairness to Opposing Party & Counsel A lawyer shall not:*

(a) unlawfully obstruct another party's access to evidence or unlawfully alter, destroy or conceal a document or other material having potential evidentiary value. A lawyer shall not counsel or assist another person to do any such act;

Per requirements of the Federal, Pennsylvania, and the PUC, I am entitled to relevant discovery in this rate case. Mr. Hicks is entitled to have his sworn testimony properly considered and his rights protected by the PUC. I request that Columbia be compelled to respond as required. This set of interrogatories are important to this rate case as they are about safety, private property rights, perceived abuse, customer dissatisfaction, operations outside of jurisdictional authority, customer treatment, and internal problem resolutions that were exposed in the Public Input Hearing ... as they all impact just and reasonable rates.

Respectfully submitted,



Richard C. Culbertson

1430 Bower Hill Road

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, the Richard C. Culbertson Interrogatories to Columbia Gas of Pennsylvania, Inc., Set IV 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 6th day of July 2021.

SERVICE BY E-MAIL ONLY

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Dated: July 6, 2021