

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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FAX (717) 783-7152  
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April 28, 2022

**Via Electronic Mail Only**

Kenneth M. Kulak, Esquire  
Mark A. Lazaroff, Esquire  
Brooke E. McGlinn, Esquire  
Catherine G. Vasudevan, Esquire  
Morgan, Lewis & Bockius LLP  
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[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)

Re: Pennsylvania Public Utility Commission  
v.  
PECO Energy Company – Gas Division  
Docket No. R-2022-3031113

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set I and Set II, in the above referenced proceeding.

In accordance with the modified rules of discovery approved during the Prehearing Conference on April 27, 2022, 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:

Dante Mugrace  
PCMG and Associates, LLC  
22 Brookes Avenue  
Gaithersburg, MD 20877  
E-Mail: [OCAPECOGAS2022@paoca.org](mailto:OCAPECOGAS2022@paoca.org)

David J. Garrett  
Resolve Utility Consulting PLLC  
101 Park Avenue, Suite 1125  
Oklahoma City, OK 73102  
E-Mail: [OCAPECOGAS2022@paoca.org](mailto:OCAPECOGAS2022@paoca.org)

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

Enclosures:

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

\*326474

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2022-3031113  
 :  
 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 I and 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 28<sup>th</sup> day of April 2022.

**SERVICE BY E-MAIL ONLY**

Scott B. Granger, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

Steven C. Gray, Esquire  
Office of Small Business Advocate  
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**SERVICE BY E-MAIL ONLY (continued)**

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Dated: April 28, 2022  
\*327714

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