



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

September 22, 2022

**Via Electronic Mail**

Daniel Clearfield, Esq.  
Bryce R. Beard, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[bbeard@eckertseamans.com](mailto:bbeard@eckertseamans.com)

Craig W. Berry, Esq.  
Philadelphia Gas Works  
800 West Montgomery Ave.  
Philadelphia, PA 19122  
[Craig.Berry@pgworks.com](mailto:Craig.Berry@pgworks.com)

Re: Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement v.  
Philadelphia Gas Works  
Docket No. C-2022-3033834  
**(I&E's Interrogatories and Requests for Production of Documents directed to  
Philadelphia Gas Works- Set I)**

Dear Counsel,

Enclosed please find the Bureau of Investigation and Enforcement's ("I&E") **Interrogatories and Requests for Production of Documents directed to Philadelphia Gas Works- Set I** in the above referenced matter. Pursuant to 52 Pa. Code § 5.342(d), please provide your responses to the Interrogatories within twenty (20) days of service.

If you have any questions, please contact me at (717) 787-1888 or [karost@pa.gov](mailto:karost@pa.gov).

Sincerely,

Kayla L. Rost  
Prosecutor  
Bureau of Investigation & Enforcement  
PA Attorney ID No. 322768  
(717) 787-1888  
[karost@pa.gov](mailto:karost@pa.gov)

KLR/jfm  
Enclosures

cc: Secretary Rosemary Chiavetta (*E-File Cover Letter and COS only*)  
Administrative Law Judge Dennis Buckley (*via email - [debuckley@pa.gov](mailto:debuckley@pa.gov) – cover letter and COS only*)  
Michael L. Swindler, Deputy Chief Prosecutor (*via email - [mwindler@pa.gov](mailto:mwindler@pa.gov)*)  
Stephanie M. Wimer, Senior Prosecutor (*via email - [stwimer@pa.gov](mailto:stwimer@pa.gov)*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2022-3033834
	:	
Philadelphia Gas Works	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing **Interrogatories and Requests for Production of Documents directed to Philadelphia Gas Works - Set I** dated September 22, 2022, upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**Service by Electronic Mail:**

Daniel Clearfield, Esq.  
Bryce R. Beard, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street  
8th Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[bbeard@eckertseamans.com](mailto:bbeard@eckertseamans.com)

Craig W. Berry, Esq.  
Senior Attorney  
Philadelphia Gas Works  
800 West Montgomery Avenue  
Philadelphia, PA 19122  
[craig.berry@pgworks.com](mailto:craig.berry@pgworks.com)

  
\_\_\_\_\_  
Kayla L. Rost  
Prosecutor  
Bureau of Investigation & Enforcement  
PA Attorney ID No. 322768  
(717) 787-1888  
[karost@pa.gov](mailto:karost@pa.gov)