



Dennis A. Whitaker
Office: 717 236-1300 x226
Direct: 717 703-0805
dawhitaker@hmslegal.com

Kevin J. McKeon
Office: 717 236-1300 x235
Direct: 717 703-0801
kjmckeon@hmslegal.com

Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

April 21, 2023

VIA ELECTRONIC MAIL

ocapgw2023brc@paoca.org

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

RE: Pennsylvania Public Utility Commission, et al. v. Philadelphia Gas Works; Docket Nos. R-2023-3037933 and C-2023-3038727; **RESPONSES OF GRAYS FERRY COGENERATION PARTNERSHIP AND VICINITY ENERGY PHILADELPHIA, INC. TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS, TO OFFICE OF CONSUMER ADVOCATE, SET IV**

Dear Counsel:

Please find enclosed the responses of Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc. to Interrogatories and Requests for Production of Documents to Office of Consumer Advocate, Set IV in the above-captioned dockets. Please note that all of the attachments 4.1.1 through 4.1.147, 4.1.149 through 4.1.151 and 4.1.153 through 4.1.175 contain **HIGHLY CONFIDENTIAL** material. **Because there has been no Protective Order issued in this case, the Highly Confidential Attachments will be provided only upon an affirmative statement by counsel that they will treat the documents in accordance with the proposed Protective Order until such time as a Protective Order is entered in this proceeding.** Please note that after we assembled the responses, we discovered that two files for Attachments, 4.1.148 and 4.1.152 were corrupt. Therefore, we will send those by supplemental response once we have functional copies. Copies of the Responses have been served in accordance with the attached Certificate of Service.

If you have any questions, please feel free to contact me.

Very truly yours,

Dennis A. Whitaker
Kevin J. McKeon
Todd S. Stewart
*Counsel for Grays Ferry Cogeneration Partnership and
Vicinity Energy Philadelphia, Inc.*

TSS/jld

Enclosure

cc: Rosemary Chiavetta, Secretary (via eFile Letter and COS only)
Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party)

VIA ELECTRONIC MAIL ONLY

Daniel Clearfield, Esquire
Sarah Stoner, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
sstoner@eckertseamans.com
Counsel for Philadelphia Gas Works

Sharon E. Webb, Esquire
Nakea S. Hurdle, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
swebb@pa.gov
nhurdle@pa.gov

Lauren E. Guerra, Esquire
Mackenzi C. Battle, Esquire
David T. Evrard, Esquire
Darryl A. Lawrence, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
ocapgw2023brc@paoca.org

Charis Mincavage, Esquire
Adeolu A. Bakare, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
Counsel for the Philadelphia Industrial and Commercial Gas Users Group

Gina L. Miller, Esquire
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
ginmiller@pa.gov

Glenn A. Watkins
President/Senior Economist
Jenny Dolen
Technical Associates, Inc.
6377 Mattawan Trail
Mechanicsville, VA 23116
watkinsg@tai-econ.com
jenny.dolen@tai-econ.com

Robert D. Knecht
Industrial Economics Incorporated
5 Plymouth Road
Lexington, MA 02421
rdk@indecon.com

John W. Sweet, Esquire
Elizabeth R. Marx, Esquire
Ria M. Pereira, Esquire
Lauren N Berman, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org



DATED: April 21, 2023

Todd S. Stewart