



Dennis A. Whitaker  
Office: 717 236-1300 x226  
Direct: 717 703-0805  
[dawhitaker@hmslegal.com](mailto:dawhitaker@hmslegal.com)

Kevin J. McKeon  
Office: 717 236-1300 x235  
Direct: 717 703-0801  
[kjmckeon@hmslegal.com](mailto:kjmckeon@hmslegal.com)

Todd S. Stewart  
Office: 717 236-1300 x242  
Direct: 717 703-0806  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

---

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

April 25, 2023

**VIA ELECTRONIC MAIL**  
[ocapgw2023brc@paoca.org](mailto:ocapgw2023brc@paoca.org)

Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> 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; **REPLACEMENT HIGHLY CONFIDENTIAL ATTACHMENTS TO 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 **REPLACEMENT HIGHLY CONFIDENTIAL Attachments** to 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 contain **HIGHLY CONFIDENTIAL** material. While all file names do warn the recipient that the files are **HIGHLY CONFIDENTIAL**, the files provided yesterday did not contain that message on the documents. The files at the attached link are each marked as **HIGHLY CONFIDENTIAL**, and we ask that any use of these attachments be with the Replacement responses.

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 use these attachments in place of the ones you received yesterday. Copies of the Responses have been served in accordance with the attached Certificate of Service.

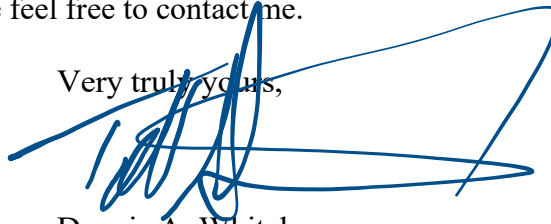
Office of Consumer Advocate

April 25, 2023

Page 2

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

Very truly yours,

A handwritten signature in blue ink, appearing to be "Dennis A. Whitaker", written over the text "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, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[sstoner@eckertseamans.com](mailto:sstoner@eckertseamans.com)  
*Counsel for Philadelphia Gas Works*

Lauren E. Guerra, Esquire  
Mackenzi C. Battle, Esquire  
David T. Evrard, Esquire  
Darryl A. Lawrence, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[ocapgw2023brc@paoca.org](mailto:ocapgw2023brc@paoca.org)

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](mailto:ginmiller@pa.gov)

Craig W. Berry, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
[Craig.berry@pgworks.com](mailto:Craig.berry@pgworks.com)

Sharon E. Webb, Esquire  
Nakea S. Hurdle, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)  
[nhurdle@pa.gov](mailto:nhurdle@pa.gov)

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



DATED: April 25, 2023

---

Todd S. Stewart