



McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

**Charis Mincavage**  
Direct Dial: 717.237.5437  
Direct Fax: 717.260.1725  
cmincavage@mcneeslaw.com

May 9, 2023

Daniel Clearfield, Esq.  
Sarah C. Stoner, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8th Floor  
Harrisburg, PA 17101

**VIA E-MAIL**

**RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works;  
Docket Nos. R-2023-3037933**

Dear Counsel:

Attached please find the Interrogatories, Set IV, on behalf of the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG"), in the above-referenced proceeding.

Please provide responses within twelve (12) calendar days, with best efforts to answer in ten (10) days pursuant to the discovery modifications adopted during the Prehearing Conference in this proceeding on April 28, 2023. Please also endeavor to forward responses in an organized manner as they are completed; it is not necessary to await completion of all responses prior to forwarding those completed more quickly.

Please communicate any objections or questions that you may have to these Interrogatories as soon as possible.

As shown by the attached Certificate of Service, all parties to these proceedings are being duly served via email.

Sincerely,

A handwritten signature in black ink that reads 'Charis Mincavage'.

Charis Mincavage  
MCNEES WALLACE & NURICK LLC

Counsel to the Philadelphia Industrial and Commercial Gas Users Group

Enclosure

c: Rosemary Chiavetta, Secretary (via electronic filing, letter and certificate only)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

### VIA E-MAIL

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

Daniel Clearfield, Esq.  
Sarah C. Stoner, Esq.  
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)

Gina L. Miller, Esq.  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
P. O. Box 4365  
Harrisburg, PA 17105-3265  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)

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

Lauren E. Guerra, Esq.  
David T. Evrard, Esq.  
Mackenzie C. Battle, Esq.  
Darryl A. Lawrence, Esq.  
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)

Dennis A. Whitaker, Esq.  
Kevin J. McKeon, Esq.  
Todd S. Stewart, Esq.  
Hawke McKeon & Sniscak LLP  
100 N 10th Street  
Harrisburg, PA 17101  
[dawhitaker@hmslegal.com](mailto:dawhitaker@hmslegal.com)  
[kjmckeon@hmslegal.com](mailto:kjmckeon@hmslegal.com)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Devin McDougall, Esq.  
Senior Attorney  
Clean Energy Program  
Earthjustice  
1617 John F. Kennedy Blvd., Suite 2020  
Philadelphia, PA 19103  
[dmcDougall@earthjustice.org](mailto:dmcDougall@earthjustice.org)

Certificate of Service

Page 2

Robert W. Ballenger, Esq.  
Joline R. Price, Esq.  
Daniela E. Rakhlina-Powsner, Esq.  
COMMUNITY LEGAL SERVICES, INC.  
1424 Chestnut Street  
Philadelphia, PA 19102  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[drakhlinapowsner@clsphila.org](mailto:drakhlinapowsner@clsphila.org)



---

Charis Mincavage

Counsel to the Philadelphia Industrial and  
Commercial Gas Users Group

Dated this 9<sup>th</sup> day of May, 2023, at Harrisburg, Pennsylvania