

Sarah C. Stoner, Esq.  
717.237.6026  
sstoner@eckertseamans.com

May 24, 2023

**Via Email Only**

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)

Re: PA Public Utility Commission v. Philadelphia Gas Works  
2023 PGW Base Rate Case Filing – Docket No. R-2023-3037933

Dear Counsel:

On behalf of Philadelphia Gas Works, enclosed please find its Responses to Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc. (“**Grays Ferry**”) **Interrogatories, Set III, Nos. 11, 17, 19-22, 25, 31, 34-36, and 46-48**, with regard to the above-referenced matter. Please note that these discovery responses are being served **via email only** and that the responses and attachments are available at ESCM Share File site <https://eckertseamans.sharefile.com/home/shared/fo6fd9f8-6ad0-4d71-b203-3ef4836d9573>. To receive access, please contact Sarah Stoner at [sstoner@eckertseamans.com](mailto:sstoner@eckertseamans.com) or 717-237-6026 and provide the name and email address of the person seeking access.

Sincerely,

*Sarah C. Stoner*  
Sarah C. Stoner

SCS/lww  
Enclosure

cc: Cert. of Service w/enc.  
Rosemary Chiavetta, Secretary (COS only)

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of **PGW's Responses to Grays Ferry Interrogatories, Set III, Nos. 11, 17, 19-22, 25, 31, 34-36, and 46-48**, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

### Via Email Only

Allison C. Kaster, Esq.  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

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

Harrison Breitman, Esq.  
Mackenzie C. Battle, Esq.  
David T. Evrard, Esq.  
Darryl Lawrence, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
[OCAPGW2023BRC@paoca.org](mailto:OCAPGW2023BRC@paoca.org)

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

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)

Charis Mincavage, Esq.  
Adeolu A. Bakare, Esq.  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)

Glenn A. Watkins  
President/Senior Economist  
Jenny Dolen  
Technical Associates, Inc.  
6377 Mattawan Trail  
Mechanicsville, Va. 23116  
[watkinsg@tai-econ.com](mailto:watkinsg@tai-econ.com)  
[jenny.dolen@tai-econ.com](mailto:jenny.dolen@tai-econ.com)

Robert D. Knecht  
Industrial Economics Incorporated  
5 Plymouth Road  
Lexington, MA 02421  
[rdk@indecon.com](mailto:rdk@indecon.com)

John W. Sweet, Esq.  
Elizabeth R. Marx, Esq.  
Ria M. Pereira, Esq.  
Lauren N. Berman, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

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)  
[drakhlina@clsphila.org](mailto:drakhlina@clsphila.org)

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

Date: May 24, 2023

*Sarah C. Stoner*  
Sarah C. Stoner Esq.