



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)

July 11, 2023

**VIA ELECTRONIC MAIL**

[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)

[sstoner@eckertseamans.com](mailto:sstoner@eckertseamans.com)

[nkennard@eckertseamans.com](mailto:nkennard@eckertseamans.com)

[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)

[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)

Daniel Clearfield, Esquire  
Sarah Stoner, Esquire  
Norman J. Kennard, Esquire  
Karen O. Moury, Esquire  
Lauren M. Burge, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101

RE: Pennsylvania Public Utility Commission, et al. v. Philadelphia Gas Works; Docket Nos. R-2023-3037933 and C-2023-3038727; **AMENDED RESPONSE OF GRAYS FERRY COGENERATION PARTNERSHIP AND VICINITY ENERGY PHILADELPHIA, INC. TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF PHILADELPHIA GAS WORKS, SET III, NO. 4**

Dear Counsel:

Please find enclosed the Amended Response of Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc. to Interrogatories and Requests for Production of Documents of Philadelphia Gas Works, Set III, No. 4 in the above-captioned matters. Copies of the Amended Response 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,

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

TSS/jld  
Enclosure

cc: Rosemary Chiavetta, Secretary (via electronic filing 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  
Norman J. Kennard, Esquire  
Karen O. Moury, Esquire  
Lauren M. Burge, 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)  
[nkennard@eckertseamans.com](mailto:nkennard@eckertseamans.com)  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)  
*Counsel for Philadelphia Gas Works*

Harrison W. Breitman, 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)

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

Sharon E. Webb, 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)

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*

Rebecca Barker, Esquire  
EarthJustice  
311 S. Wacker Drive, Suite 1400  
Chicago, IL 60606  
[rbarker@earthjustice.org](mailto:rbarker@earthjustice.org)  
*Counsel for POWER Interfaith*

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

Devin McDougall, Esquire  
Senior Attorney  
Clean Energy Program  
EarthJustice  
1617 John F. Kennedy Blvd., Suite 2020  
Philadelphia, PA 19103  
[dmcdougall@earthjustice.org](mailto:dmcdougall@earthjustice.org)  
*Counsel for POWER Interfaith*

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](mailto:pulp@pautilitylawproject.org)

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 W. Ballenger, Esquire  
Joline R. Price, Esquire  
Daniela E. Rakhlina-Powner, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[drakhlinapowner@clsphila.org](mailto:drakhlinapowner@clsphila.org)



---

Todd S. Stewart

DATED: July 11, 2023