

COMMONWEALTH OF PENNSYLVANIA



DARRYL A. LAWRENCE
Acting Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

 @pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

April 14, 2025

Via Electronic Filing

Daniel Clearfield, Esq.
Bryce R. Beard, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
bbeard@eckertseamans.com

Re: Pennsylvania Public Utility Commission
v.
Philadelphia Gas Works
Docket No. R-2025-3053112

Dear Counsel:

Enclosed please find Interrogatories of the Office of Consumer Advocate, Set 15, in this matter.

In accordance with the discovery modifications in the Prehearing Order issued by Judge Vero on April 14, 2025, we request that the Company provide verified answers to these inquiries within ten (10) calendar days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed.

We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

OCA25PGWBRC@paoca.org

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these

Daniel Clearfield, Esq.
Bryce R. Beard, Esq.
April 14, 2025
Page 2

interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code § 5.341(b).

Respectfully submitted,

/s/ Katie Kennedy

Katherine "Katie" Kennedy, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 317237
KKennedy@paoca.org

Enclosures

cc: PUC Secretary Rosemary Chiavetta (Letter and Certificate of Service only)
Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3053112
	:	
Philadelphia Gas Works	:	
	:	

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Philadelphia Gas Works, Set 15, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 14th day of April, 2025

SERVICE BY E-MAIL ONLY

Rebecca Lyttle, Esq.
Steven C. Gray, Esq.
Office of Small Business Advocate
Forum Place, 1st Floor
555 Walnut Street
Harrisburg, PA 17101
relyttle@pa.gov
sgray@pa.gov
Counsel for OSBA

Daniel Clearfield, Esq.
Bryce R. Beard, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
bbeard@eckertseamans.com
Counsel for PGW

Carrie B. Wright, Esq.
Michael A. Podskoch, Jr., Esq.
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
carwright@pa.gov
mpodskoch@pa.gov
Counsel for BIE

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
Counsel for PULP

Devin McDougall, Esq.
Mychal Ozaeta, Esq.
Rebecca Barger, Esq.
Hema Lochan, Esq.
Celine Busnelli
1617 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103
dmcdougall@earthjustice.org
mozaeta@earthjustice.org
rbarker@earthjustice.org
hlochan@earthjustice.org
cbusnelli@earthjustice.org
*Counsel for Clean Energy Program and
Earthjustice*

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: 717-783-5048
Fax: 717-783-7152

Dated: April 14, 2025

Joline R. Price, Esq.
Daniela E. Rakhlina-Powsner, Esq.
Benjamin Clark, Esq.
Robert W. Ballenger, Esq.
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
jprice@clsphila.org
drakhlinapowsner@clsphila.org
bclark@clsphila.org
rballenger@clsphila.org
Counsel for TURN and CAUSE-PA

Charis Mincavage, Esq.
Adeolu A. Bakare, Esq.
Rebecca Kimmel, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
rkimmel@mcneeslaw.com
Counsel for PICGUG

/s/ Katie Kennedy
Katherine “Katie” Kennedy, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 317237
KKennedy@paoca.org

Harrison W. Breitman, Esq.
Ryan Morden, Esq.
Assistant Consumer Advocates
OCA25PGWBRC@paoca.org

Counsel for:
Darryl A. Lawrence
Acting Consumer Advocate