



Eckert Seamans Cherin & Mellott, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101

TEL: 717 237 6000
FAX: 717 237 6019

Bryce R. Beard, Esq.
717.237.6041
bbeard@eckertseamans.com

April 28, 2025

Via Email Only

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

RE: PA PUC v. Philadelphia Gas Works (Base Rate Case) – Docket No. R-2025-3053112

Petition of Philadelphia Gas Works for Waiver of Provisions of Act 11 to Modify the Definition of the Charges Subject to the Distribution System Improvement Charge Cap or, Alternatively, to Increase the Current DSIC Cap – Docket No. P-2025-3053659

Dear Ms. Wright and Mr. Podskoch:

On behalf of Philadelphia Gas Works (“PGW”) enclosed please find its **Responses** to the Bureau of Investigation & Enforcement’s (“I&E”) **Interrogatories - RE, No. 22**, with regard to the above-referenced matter. The narrative responses and attachments are available at Eckert’s Sharefile Site: <https://eckertseamans.sharefile.com/f/foa36506-aace-47c5-ad23-ab36504cd332>
Please contact me if you need access or have any issues.

Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

Bryce R. Beard
Bryce R. Beard

BRB/lww
Enclosure

cc: Cert. of Service w/enc.
Matthew L. Homsher, Secretary (COS only)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of **PGW's Responses** to the Bureau of Investigation & Enforcement's ("**I&E**") **Interrogatories - RE, No. 22**, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email

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

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

Harrison W. Breitman, Esq.
Ryan Morden, Esq.
Katherine Kennedy, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
OCA25PGWBRC@paoca.org

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

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

Devin McDougall, Esq.
Mychal Ozaeta, Esq.
Rebecca Barger, Esq.
Hema Lochan, Esq.
Celine Busnelli
Clean Energy Program
Earthjustice
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

Date: April 28, 2025

/s/ Bryce R. Beard

Bryce R. Beard, Esq.