



May 5, 2025

Via Electronic Mail

Daniel Clearfield, Esq.
Bryce R. Beard, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market St., 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 the **Interrogatories and Requests for Production, Set XII, of the Tenant Union Representative Network and Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** in the above captioned matter.

Copies of the Interrogatories and Requests for Production are being served upon all parties, as indicated on the attached Certificate of Service. Additionally, this Cover Letter and Certificate of Service are being electronically filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission.

If you have any questions, do not hesitate to contact me.

Sincerely,

Benjamin Clark, Esq.
Counsel for TURN and CAUSE-PA
Community Legal Services, Inc.

Encl.

Cc: Certificate of Service



BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	R-2025-3053112
Office of Consumer Advocate	:	C-2025-3053827
Office of Small Business Advocate	:	C-2025-3053978
The Philadelphia Industrial and Commercial	:	C-2025-3054216
Gas Users Group	:	
	:	
	:	
v.	:	
	:	
Philadelphia Gas Works	:	

CERTIFICATE OF SERVICE

I hereby certify that I have, on this day, served copies of the **Interrogatories and Requests for Production, Set XII, of the Tenant Union Representative Network and Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

SERVICE BY EMAIL ONLY

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

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

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

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

Devin McDougall, Esq.
Mychal Ozaeta, Esq.
Rebecca Barker, Esq.
Hema Lochan, Esq.
Celine Busnelli
Clean Energy Program
Earthjustice
1617 John F. Kennedy Blvd., Suite 1130
Philadelphia, PA 19103
dmcdougall@earthjustice.org
mozaeta@earthjustice.org
rbarker@earthjustice.org
hlochan@earthjustice.org
cbusnelli@earthjustice.org

Charis Mincavage, Esq.
Adeolu A. Bakare, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17101-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com

Robert Hoaglund, Esquire
Senior Attorney
Philadelphia Gas Works
800 West Montgomery Ave.
Philadelphia, PA 19122
Robert.Hoaglund@pgworks.com

Respectfully submitted,

Benjamin Clark, Esq.
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
(215) 227-4378
bclark@clsphila.org

May 5, 2025