

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

May 22, 2025

**Via Email Only**

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](mailto:dmcdougall@earthjustice.org)  
[mozaeta@earthjustice.org](mailto:mozaeta@earthjustice.org)  
[rbarker@earthjustice.org](mailto:rbarker@earthjustice.org)  
[hlochan@earthjustice.org](mailto:hlochan@earthjustice.org)  
[cbusnelli@earthjustice.org](mailto:cbusnelli@earthjustice.org)

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 Counsel:

On behalf of Philadelphia Gas Works (“PGW”) enclosed please find its Interrogatories addressed to the Earth Justice Advocates (“EJA”), Set I, with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

*Bryce R. Beard*

Bryce R. Beard  
BRB/jls  
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 Interrogatories, Set I**, upon **Earth Justice Advocates** 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](mailto:carwright@pa.gov)  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)

Steven C. Gray, Esq.  
Rebecca Lyttle, Esq.  
Office of Small Business Advocate  
Forum Place, 1<sup>st</sup> Floor  
555 Walnut Street  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto: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](mailto: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](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[rkimmel@mcneeslaw.com](mailto: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](mailto:jprice@clsphila.org)  
[drakhlinapowsner@clsphila.org](mailto:drakhlinapowsner@clsphila.org)  
[bclark@clsphila.org](mailto:bclark@clsphila.org)  
[rballenger@clsphila.org](mailto: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](mailto:dmcDougall@earthjustice.org)  
[mozaeta@earthjustice.org](mailto:mozaeta@earthjustice.org)  
[rbarker@earthjustice.org](mailto:rbarker@earthjustice.org)  
[hlochan@earthjustice.org](mailto:hlochan@earthjustice.org)  
[cbusnelli@earthjustice.org](mailto:cbusnelli@earthjustice.org)

Date: May 22, 2025

/s/ Bryce R. Beard

Bryce R. Beard, Esq.