



May 29, 2025

VIA ELECTRONIC MAIL

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

Re: *Pa. PUC v. Philadelphia Gas Works*, Docket No. R-2025-3053112

Dear Counsel,

Please find enclosed the Written Objections of EJA to PGW's Set I Interrogatories, Nos. 8–13, 15–20, and 22 in the above-referenced proceeding. Should you have any questions or if you would like to discuss, please do not hesitate to contact me. Thank you.

Sincerely,

/s/ Devin McDougall

PA Attorney ID No. 329855
Supervising Senior Attorney
Earthjustice
1617 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103
dmdougall@earthjustice.org
(917) 628-7411

cc:

Secretary Rosemary Chiavetta (Cover Letter & Certificate of Service only)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al.

v.

Philadelphia Gas Works

Docket No. R-2025-3053112
Docket No. C-2025-3053827
Docket No. C-2025-3053978
Docket No. C-2025-3054216

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the enclosed document upon the parties of record to this proceeding, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) in the manner and upon the persons listed below.

Service By Email Only

<p>Harrison W. Breitman, Esq. Ryan Morden, Esq. Katherine Kennedy, Esq. Keith D. Earls, Paralegal Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 OCA25PGWBRC@paoca.org kearls@paoca.org</p> <p><i>Counsel for OCA</i></p>	<p>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</p> <p><i>Counsel for OSBA</i></p>
<p>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</p> <p><i>Counsel for BIE</i></p>	<p>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</p> <p><i>Counsel for PGW</i></p>

<p>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</p> <p><i>Counsel for TURN and CAUSE-PA</i></p>	<p>Charis Mincavage, Esq. McNees Wallace & Nurick, LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108 cmincavage@mcneeslaw.com</p> <p><i>Counsel for the Philadelphia Industrial and Commercial Gas Users Group</i></p>
--	---

Dated: May 29, 2025

/s/ Devin McDougall
PA Attorney ID No. 329855
Supervising Senior Attorney
Earthjustice
1617 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103
(917) 628-7411
dmcdougall@earthjustice.org

Counsel for the Energy Justice Advocates