



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

June 13, 2025

**Via Electronic Mail**

Daniel Clearfield, Esq.  
Bryce Beard, Esq.  
Eckert Seamans Cherin & Mellot LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[bbeard@eckertseamans.com](mailto:bbeard@eckertseamans.com)

Re: Pennsylvania Public Utility Commission v.  
Philadelphia Gas Works  
Docket No. R-2025-3053112  
**I&E Responses to PGW Interrogatories – Set I**

Dear Counsel:

Enclosed please find the following Responses of the Bureau of Investigation and Enforcement to the Interrogatories of Philadelphia Gas Works:

**I&E Responses to PGW – Set I (nos. 1-12) – Pankiw**

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads 'Carrie B. Wright'.

Carrie B. Wright  
Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 208185  
(717) 783-6156  
[carwright@pa.gov](mailto:carwright@pa.gov)

CBW/jfm  
Enclosures

cc: Matthew L. Homsher, Secretary (*Cover Letter and Certificate of Service only – via e-file*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Interrogatory Responses** dated June 13, 2025, in the manner and upon the persons listed below.

**Served via Electronic Mail Only**

Daniel Clearfield, Esq.  
Bryce Beard, Esq.  
Eckert Seamans Cherin & Mellot LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[bbeard@eckertseamans.com](mailto:bbeard@eckertseamans.com)

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

Robert Hoaglund, Esq.  
Philadelphia Gas Works  
800 West Montgomery Avenue  
Philadelphia, PA 19122  
[robert.hoaglund@pgworks.com](mailto:robert.hoaglund@pgworks.com)

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)

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](mailto:OCA25PGWBRC@paoca.org)  
[kearls@paoca.org](mailto:kearls@paoca.org)

Robert W. Ballenger, Esq.  
Joline R. Price, Esq.  
Daniela E. Rakhlina-Powsner, Esq.  
Benjamin Clark, Esq.  
Community Legal Services Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[drakhlinapowsner@clsphila.org](mailto:drakhlinapowsner@clsphila.org)

Devin McDougall, Esq.  
Rebecca Barker, Esq.  
Mychal Ozaeta, 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)  
[rbarker@earthjustice.org](mailto:rbarker@earthjustice.org)  
[mozaeta@earthjustice.org](mailto:mozaeta@earthjustice.org)  
[hlochan@earthjustice.org](mailto:hlochan@earthjustice.org)  
[cbusnelli@earthjustice.org](mailto:cbusnelli@earthjustice.org)

Jason Hails  
Quantiv Advisory LLC  
925 Wappoo Road, Suite A  
Charleston, SC 29407  
[j.hails@quantivadvisory.com](mailto:j.hails@quantivadvisory.com)

Roger Cathcart, CPA, CA, CBV  
Cathcart Advisors Inc.  
Financial Regulatory Advisors  
300-330 St. Mary Avenue  
Winnipeg, MB, R3C 3Z5  
Canada  
[remc@cathcartadvisors.com](mailto:remc@cathcartadvisors.com)

Jennifer Rogers  
Jerome D. Mierzwa  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway, Suite 300  
Columbia, MD 21144  
[OCA25PGWBRC@paoca.org](mailto:OCA25PGWBRC@paoca.org)

Christopher Walters  
Brubaker & Associates Inc.  
16690 Swingley Road, Suite 104  
Chesterfield, MO 63017  
[OCA25PGWBRC@paoca.org](mailto:OCA25PGWBRC@paoca.org)

Roger Colton  
Fisher, Sheehan & Colton  
34 Warwick Road  
Belmont, MA 02478-2841  
[OCA25PGWBRC@paoca.org](mailto:OCA25PGWBRC@paoca.org)

Barbara Alexander  
Barbara Alexander Consulting LLC  
44 Beech Street  
Hallowell, ME 04347  
[OCA25PGWBRC@paoca.org](mailto:OCA25PGWBRC@paoca.org)

Michael Deupree  
Acadian Consulting Group  
5800 One Perkins Place, Suite 5F  
Baton Rouge, LA 70808  
[OCA25PGWBRC@paoca.org](mailto:OCA25PGWBRC@paoca.org)

Patrick Cicero  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pcicero@pautilitylawproject.org](mailto:pcicero@pautilitylawproject.org)



---

Carrie B. Wright  
Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 208185  
(717) 783-6156  
[carwright@pa.gov](mailto:carwright@pa.gov)