



June 18, 2025

VIA EMAIL

The Honorable Eranda Vero
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
evero@pa.gov

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

Your Honor,

EJA writes in regard to PGW's recent letter requesting to withdraw its Motion to Dismiss Objections and Compel Complete Responses to PGW's Set II Interrogatories, Nos. 11-13 ("Motion to Dismiss").

EJA explained to PGW prior to the filing of its Motion to Dismiss that Questions Nos. 11-13 are virtually identical to questions that were ruled in 2020 to be not only impermissible, but so unduly burdensome as to violate intervenors' due process rights. PGW declined to withdraw the questions and proceeded with filing its Motion to Dismiss anyway.

PGW now cites, as the reason for its requested withdrawal, a desire to focus the use of its time on other future submissions. However, as no further work from PGW is required in connection with its Motion to Dismiss, which is fully briefed, this rationale is not applicable.

Since EJA was forced to expend substantial time preparing its Answer to PGW's Motion to Dismiss, EJA respectfully requests that Your Honor rule on the permissibility of PGW's Set II Interrogatories, Nos. 11-13. It is not reasonable for PGW, who had notice of the Commission's 2020 ruling, to file its Motion to Dismiss anyway, wait for EJA to prepare and file its Answer, and then attempt to evade a ruling on the merits of its Motion to Dismiss by withdrawing it at the last minute. EJA is concerned that PGW may in the future continue to attempt to issue similar questions and believes the public interest would benefit from a definitive ruling on this matter. Thank you.

Sincerely,

/s/ Devin McDougall

PA Attorney ID No. 329855

Supervising Senior Attorney

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cc:

Secretary Matthew L. Homsher, Esq.
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 E-Service and Email Only

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Dated: June 18, 2025

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