



COMMONWEALTH OF PENNSYLVANIA

August 12, 2025

Meagan Moore, Esquire  
Peoples Natural Gas Company, LLC  
375 North Shore Drive, Suite 600  
Pittsburgh, PA 15212

**Re: Petition for Generic Investigation or Rulemaking Regarding “Gas-On-Gas” Competition Between Jurisdictional Natural Gas Distribution Companies & Generic Investigation Regarding Gas-on-Gas Competition Between Jurisdictional Natural Gas Distribution Companies / Docket Nos. P-2011-2277868 & I-2012-2320323**

Dear Counsel:

Enclosed please find the **HIGHLY CONFIDENTIAL** Interrogatories, Set I, to Peoples Natural Gas Company LLC (“Peoples”), on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceedings.

We respectfully request that you provide verified answers to these inquiries within fifteen (15) days of service. Additionally, please serve one copy on OSBA’s consultants, Mark D. Ewen and Robert D. Knecht as indicated below:

Mr. Mark D. Ewen  
Industrial Economics, Incorporated  
2067 Massachusetts Avenue  
Cambridge, Massachusetts 02140  
[mewen@indecon.com](mailto:mewen@indecon.com)

Mr. Robert D. Knecht  
Industrial Economics, Incorporated  
5 Plymouth Road  
Lexington, MA 02421  
[rdk@indecon.com](mailto:rdk@indecon.com)

Copies of these Interrogatories will be served upon all parties, as indicated on the attached Certificate of Service. Additionally, this Certificate of Service has been electronically filed with Secretary Homsher of the Pennsylvania Public Utility Commission, as required by 52 Pa. Code § 5.341(b). If you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Steven C. Gray*

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: PA PUC Secretary Matthew L. Homsher (Cover Letter & Certificate of Service only)  
Mark D. Ewen / Robert D. Knecht  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition for Generic Investigation or Rulemaking Regarding “Gas-On-Gas Competition” Between Jurisdictional Natural Gas Distribution Companies** : : **Docket No. P-2011-2277868**

**Generic Investigation Regarding Gas-on-Gas Competition Between Jurisdictional Natural Gas Distribution Companies** : : **Docket No. I-2012-2320323**

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Christy M. Appleby, Esquire  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101  
[CApplby@paoca.org](mailto:CApplby@paoca.org)

Candis A. Tunilo, Esquire  
NiSource Corporate Services Company  
800 N Third Street, Suite 204  
Harrisburg, PA 17102  
[ctunilo@nisource.com](mailto:ctunilo@nisource.com)

Allison C. Kaster, Esquire  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Thomas J. Sniscak, Esquire  
Erich W. Struble, Esquire  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[ewstruble@hmslegal.com](mailto:ewstruble@hmslegal.com)

Meagan Moore, Esquire  
Andrew P. Wachter  
Carol A. Scanlon  
Peoples Natural Gas Company, LLC  
375 North Shore Drive, Suite 600  
Pittsburgh, PA 15212  
[meagan.moore@peoples-gas.com](mailto:meagan.moore@peoples-gas.com)  
[Andrew.Wachter@peoples-gas.com](mailto:Andrew.Wachter@peoples-gas.com)  
[Carol.Scanlon@peoples-gas.com](mailto:Carol.Scanlon@peoples-gas.com)

Whitney E. Snyder, Esquire  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)

Emily Farah, Esquire  
NiSource Corporate Services Company  
121 Champion Way, Suite 100  
Canonsburg, PA 15317  
[efarah@nisource.com](mailto:efarah@nisource.com)

Dominick Sisinni, Esquire  
National Fuel  
1100 State Street  
Erie, PA 16501  
[sisinnid@natfuel.com](mailto:sisinnid@natfuel.com)

John F. Povilaitis, Esquire  
Alan M. Seltzer, Esquire  
Buchanan Ingersoll & Rooney, PC  
409 North Second Street, Suite 500  
Harrisburg, PA 17101-1357  
(717) 237-4800  
[john.povilaitis@bipc.com](mailto:john.povilaitis@bipc.com)  
[alan.seltzer@bipc.com](mailto:alan.seltzer@bipc.com)

Susan E. Bruce, Esquire  
Charis Mincavage, Esquire  
Rebecca Kimmel, Esquire  
McNees Wallace & Nurick, LLC  
100 Pine Street  
P. O. Box 1166  
Harrisburg, PA 17108-1166  
[sbruce@mcneeslaw.com](mailto:sbruce@mcneeslaw.com)  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[rkimmel@mcneeslaw.com](mailto:rkimmel@mcneeslaw.com)

Dated: August 12, 2025

*/s/ Steven C. Gray*  
\_\_\_\_\_  
Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538