

COMMONWEALTH OF PENNSYLVANIA



DARRYL A. LAWRENCE
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

 @pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

January 26, 2026

Via Electronic Mail Only

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

Robert Hoaglund, Esquire
Philadelphia Gas Works
800 West Montgomery Ave.
Philadelphia, PA 19122
Robert.Hoaglund@pgworks.com

Re: Pennsylvania Public Utility Commission
v.
Philadelphia Gas Works
Docket No. R-2023-3037933

Dear Counsel:

Enclosed please find Interrogatories of the Office of Consumer Advocate, Set 2, in this matter.

In accordance with the Commission's Rules of Practice and Procedure, at 52 Pa. Code Section 5.342(d), we request that the Company provide verified answers to these inquiries within fifteen (15) calendar days of the date of this letter. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed.

We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

Daniel Clearfield, Esquire
Bryce Beard, Esquire
Robert Hoaglund, Esquire
January 26, 2026
Page 2

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

OCAPGW2023Remand@paoca.org

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code § 5.341(b).

Respectfully submitted,

/s/ Harrison W. Breitman
Harrison W. Breitman, Esq.
Senior Assistant Consumer Advocate
PA Attorney I.D. # 320580
hbreitman@paoca.org

Enclosures

cc: PUC Secretary Matthew L. Homsher (Letter and Certificate of Service only)
Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2023-3037933
 :
 Philadelphia Gas Works :

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to Philadelphia Gas Works, Set 2, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 26th day of January, 2026.

SERVICE BY E-MAIL ONLY

Carrie B. Wright, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
carwright@pa.gov
Counsel for I&E

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

Steven Gray, Esquire
Rebecca Lyttle, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
sgray@pa.gov
relyttle@pa.gov
Counsel for OSBA

Robert Hoaglund, Esq.
Philadelphia Gas Works
800 West Montgomery Ave.
Philadelphia, PA 19122
Robert.Hoaglund@pgworks.com
Counsel for PGW

Charis Mincavage, Esquire
Adeolu A. Bakare, Esquire
Brigid Landu Khuri, Esquire
Victoria Geddis, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
bkhuri@mcneeslaw.com
vgeddis@mcneeslaw.com
Counsel for PICGUG

Robert W. Ballenger, Esquire
Joline R. Price, Esquire
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
rballenger@clsphila.org
jprice@clsphila.org
Counsel for TURN

John W. Sweet, Esquire
Elizabeth R. Marx, Esquire
Ria M. Pereira, Esquire
Lauren N. Berman, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
Counsel for CAUSE-PA

Dennis A. Whitaker, Esquire
Kevin J. McKeon, Esquire
Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 North 10th Street
Harrisburg, PA 17101
dawhitaker@hmslegal.com
kjmckeon@hmslegal.com
tsstewart@hmslegal.com
*Counsel for Grays Ferry Cogeneration
Partnership & Vicinity Energy Philadelphia,
Inc.*

Rebecca Barker, Esquire
Earthjustice
311 S. Wacker Drive
Suite 1400
Chicago, IL 60606
rbarker@earthjustice.org
Counsel for POWER Interfaith

Devin McDougall, Esquire
Clean Energy Program
Earthjustice
1617 John F. Kennedy Blvd.
Suite 2020
Philadelphia, PA 19103
dmcDougall@earthjustice.org
Counsel for POWER Interfaith

SERVICE BY U.S. POSTAL SERVICE

Representative Rick Krajewski
Pennsylvania House of Representatives
109B East Wing
PO Box 202188
Harrisburg, PA 17120

Robert D. Knecht
Industrial Economics Incorporated
5 Plymouth Road
Lexington, MA 02140

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: 717-783-5048
Fax: 717-783-7152

/s/ Harrison W. Breitman
Harrison W. Breitman, Esq.
Senior Assistant Consumer Advocate
PA Attorney I.D. # 320580
hbreitman@paoca.org

Dated: January 26, 2026

Counsel for:
Darryl A. Lawrence
Consumer Advocate