

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

FAX (717) 783-7152  
consumer@paoca.org

May 15, 2018

Michael W. Gang, Esquire  
Anthony D. Kanagy, Esquire  
Post & Schell, PC  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101

Re: Pa. Public Utility Commission  
v.  
Duquesne Light Company – Base Rate  
Docket No. R-2018-3000124

Dear Counsel:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set VII, in the above-referenced proceeding.

In accordance with the discovery modifications adopted during the May 3, 2018 Prehearing Conference in this proceeding, we request that the Company provide verified answers to these inquiries within ten (10) days of service. 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.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Lafayette Morgan  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway  
Suite 300  
Columbia, MD 21044  
[lmorgan@exeterassociates.com](mailto:lmorgan@exeterassociates.com)

Michael W. Gang, Esquire  
Anthony D. Kanagy, Esquire  
May 15, 2018  
Page 2

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).

Sincerely,



Phillip D. Demanchick  
Assistant Consumer Advocate  
PA Attorney I.D. # 324761  
E-Mail: [PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)

Enclosures:

cc: PUC Secretary Chiavetta, (Letter and Certificate of Service only)  
Certificate of Service  
\*249513

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :  
v. : Docket No. R-2018-3000124  
Duquesne Light Company – Base Rate :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Duquesne Light Company, Set VII, 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 15<sup>th</sup> day of May 2018.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Gina L. Miller, Esquire  
John M. Coogan, Esquire  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

David T. Fisfis, Esquire  
Tishekia E. Williams, Esquire  
Michael Zimmerman, Esquire  
Duquesne Light Company  
411 Seventh Avenue  
16<sup>th</sup> Floor  
Pittsburgh, PA 15219

Michael W. Gang, Esquire  
Anthony D. Kanagy, Esquire  
Post & Schell, PC  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101

Sharon E. Webb, Esquire  
Office of Small Business Advocate  
300 North Second Street  
Suite 202  
Harrisburg, PA 17101

Emily M. Farah, Esquire  
Duquesne Light Company  
411 Seventh Avenue  
Mail Drop 15-7  
Pittsburgh, PA 15219

Patrick M. Cicero, Esquire  
Kadeem Morris, Esquire  
Elizabeth R. Marx, Esquire  
Pennsylvania Utility Law Project  
CAUSE-PA  
118 Locust Street  
Harrisburg, PA 17101

David P. Zambito, Esquire  
Jonathan P. Nase, Esquire  
Cozen O' Connor  
17 North Second Street  
Suite 1410  
Harrisburg, PA 17101

Joseph L. Vullo, Esquire  
Burke, Vullo, Reilly, Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704

William H. Roberts II, Esquire  
PNG Companies, LLC  
375 North Shore Drive  
Pittsburgh, PA 15212

Joseph Otis Minott, Esquire  
Ernest Logan Welde, Esquire  
Clean Air Council  
135 South 19<sup>th</sup> Street  
Suite 300  
Philadelphia, PA 19103

Mark C. Szybist, Esquire  
National Resources Defense Council  
1152 South 15<sup>th</sup> Street NW  
Suite 300  
Washington, D.C. 20005

Anthony C. Decusatis, Esquire  
Morgan, Lewis, & Bockius, LLP  
1701 Market Street  
Philadelphia, PA 19103

Scott J. Rubin, Esquire  
333 Oak Lane  
Bloomsburg, PA 17815

Pamela C. Polacek, Esquire  
Matthew L. Garber, Esquire  
McNees, Wallace, & Nurick, LLC  
100 Pine Street  
Harrisburg, PA 17101

SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

Jason Dolby  
409 Anawanda Avenue  
Pittsburgh, PA 15228

James Fedell  
2009 Forge Drive  
Aliquippa, PA 15001

/s/ Phillip D. Demanchick  
Phillip D. Demanchick  
Assistant Consumer Advocate  
PA Attorney I.D. # 324761  
E-Mail: [PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)

David T. Evrard  
Assistant Consumer Advocate  
PA Attorney I.D. # 33870  
E-Mail: [DEvrard@paoca.org](mailto:DEvrard@paoca.org)

Aron J. Beatty  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 86625  
E-Mail: [ABeatty@paoca.org](mailto:ABeatty@paoca.org)

Counsel for Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: May 15, 2018  
\*249514