


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Harrisburg, Pennsylvania 17101-1923  
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800-684-6560

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 /pennoca

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

March 30, 2020

**Via Electronic Mail Only**

Daniel Clearfield, Esquire  
Sarah Stoner, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street  
8th Floor  
Harrisburg, PA 17101

Re: Pennsylvania Public Utility Commission  
v.  
Philadelphia Gas Works  
Docket No. R-2020-3017206

Dear Counsel:

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

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) 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:

David S. Habr  
Habr Economics  
213 Cornuta Way  
Nipomo, CA 93444-5020  
E-Mail: [OCAPGW2020@paoca.org](mailto:OCAPGW2020@paoca.org)

Daniel Clearfield, Esquire  
Sarah Stoner, Esquire  
March 30, 2020  
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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,

/s/ Christy M. Appleby  
Christy M. Appleby  
Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
E-Mail: [CApplby@paoca.org](mailto:CApplby@paoca.org)

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service only)  
Certificate of Service

\*285823

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :  
v. : Docket No. R-2020-3017206  
Philadelphia Gas Works :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Philadelphia Gas Works, Set II, 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 30<sup>th</sup> day of March 2020.

**SERVICE BY E-MAIL ONLY**

Carrie B. Wright, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Daniel Clearfield, Esquire  
Sarah Stoner, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
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Harrisburg, PA 17101

Graciela Christlieb, Esquire  
Philadelphia Gas Works  
800 West Montgomery Avenue  
Philadelphia, PA 19122

Todd S. Stewart, Esquire  
Hawke McKeon & Sniscak LLP  
100 North 10<sup>th</sup> Street  
Harrisburg, PA 17101

Sharon E. Webb, Esquire  
Daniel G. Asmus, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

John W. Sweet, Esquire  
Elizabeth R. Marx, Esquire  
Ria M. Pereira, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

Gregory J. Stunder, VP  
Philadelphia Gas Works  
800 West Montgomery Avenue  
Philadelphia, PA 19122

/s/ Christy M. Appleby  
Christy M. Appleby  
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Fax: (717) 783-7152  
Dated: March 30, 2020  
\*285821