



Eckert Seamans Cherin & Mellott, LLC  
213 Market Street  
8<sup>th</sup> Floor  
Harrisburg, PA 17101

TEL: 717 237 6000  
FAX: 717 237 6019

Sarah C. Stoner  
717.237.6026  
sstoner@eckertseamans.com

April 27, 2020

**Via Email**

Carrie B. Wright, Prosecutor  
Bureau of Investigation  
& Enforcement  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[carwright@pa.gov](mailto:carwright@pa.gov)

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

---

Dear Counselors:

Enclosed please find Philadelphia Gas Works' Responses to the Bureau of Investigation & Enforcement's Interrogatories, I&E PS Nos. 1-6, 9-11, and 13-16 with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

The discovery responses including the attachments (if any) are available at the Eckert Seamans' ShareFile site. To receive access to ShareFile, please contact me and provide the name and email address of the person seeking access.

Sincerely,

*Sarah C. Stoner*

Sarah C. Stoner

Enclosure

cc: Cert. of Service w/enc.  
Rosemary Chiavetta, w/COS only  
Graciela Christlieb, Senior Attorney, PGW (via email)

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

### Via Email

Carrie B. Wright, Esq.  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[carwright@pa.gov](mailto:carwright@pa.gov)

Daniel G. Asmus, Esq.  
Sharon E. Webb, Esq.  
Office of Small Business Advocate  
Forum Place, 1<sup>st</sup> Floor  
555 Walnut Street  
Harrisburg, PA 17101  
[dasmus@pa.gov](mailto:dasmus@pa.gov)  
[swebb@pa.gov](mailto:swebb@pa.gov)

Robert D. Knecht  
Industrial Economics Incorporated  
2067 Massachusetts Ave.  
Cambridge, MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)

Darryl A. Lawrence, Esq.  
Christy M. Appleby, Esq.  
Santo G. Spataro, Esq.  
Laura Antinucci, Esq.  
Office of Consumer Advocate  
5th Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17101-1923  
[OCAPGW2020@paoca.org](mailto:OCAPGW2020@paoca.org)

Gregory J. Stunder, Esq.  
Philadelphia Gas Works  
800 West Montgomery Avenue  
Philadelphia, PA 19122  
[Gregory.Stunder@pgworks.com](mailto:Gregory.Stunder@pgworks.com)

John W. Sweet, Esq.  
Elizabeth R. Marx, Esq.  
Ria M. Pereira, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

Todd S. Stewart, Esq.  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Charis Mincavage, Esq.  
Adeolu A. Bakare, Esq.  
Jo-Anne Thompson, Esq.  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[jthompson@mcneeslaw.com](mailto:jthompson@mcneeslaw.com)

Josie B. H. Pickens, Esq.  
Joline R. Price, Esq.  
Robert W. Ballenger, Esq.  
Community Legal Services, Inc.  
1410 West Erie Avenue  
Philadelphia, PA 19140  
[jpickens@clsphila.org](mailto:jpickens@clsphila.org)  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)

Dated: April 27, 2020

*Sarah C. Stoner*  

---

Sarah C. Stoner, Esq.