


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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 /pennoca

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

December 7, 2020

Via Electronic Mail Only

Kenneth M. Kulak, Esquire
Mark A. Lazaroff, Esquire
Catherine G. Vasudevan, Esquire
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103

Re: Pennsylvania Public Utility Commission
v.
PECO Energy Company – Gas Division
Docket No. R-2020-3018929

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set XV (**CONFIDENTIAL VERSION**), in the above referenced proceeding. As these interrogatories contain **CONFIDENTIAL** material, the **CONFIDENTIAL VERSION** will only be served upon the Company and the parties that have executed a non-disclosure certificate. A public version will be made available to the other parties.

In accordance with the discovery modifications in Prehearing Order #1, 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 consultants, as listed below:

Lafayette K. Morgan
Exeter Associates, Inc.
10480 Little Patuxent Pkwy
Suite 300
Columbia, MD 21044-3575
E-Mail: OCAPECOGAS2020@paoca.org

Kenneth M. Kulak, Esquire
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December 7, 2020
Page 2

Geoffrey Crandall
MSB Energy Associates, Inc.
6907 University Ave # 162
Middleton, WI 53562
E-Mail: OCAPECOGAS2020@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).

Sincerely,

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

Enclosures:

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

*300460

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :
v. : Docket No. R-2020-3018929
PECO Energy Company – Gas Division :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to PECO Energy Company – Gas Division, Set XV (**CONFIDENTIAL VERSION**), 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 7th day of December 2020.

**Receiving CONFIDENTIAL information*

SERVICE BY E-MAIL ONLY

Scott B. Granger, Esquire*
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Steven C. Gray, Esquire*
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17109-1923

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Jack R. Garfinkle, Esquire*
Brandon J. Pierce, Esquire*
PECO Energy Company
2301 Market Street
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Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

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Dated: December 7, 2020
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