

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
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FAX (717) 783-7152  
consumer@paoca.org

December 31, 2020

**Via Electronic Mail Only**

Timothy McHugh, Esquire  
Michael A. Gruin, Esquire  
Stevens & Lee  
17 North 2nd Street  
16th Floor  
Harrisburg, PA 17101

Re: Petition of Duquesne Light Company for  
Approval of its Act 129 Phase IV Energy  
Efficiency and Conservation Plan  
Docket No. M-2020-3020818

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set I, 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 twenty (20) 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:

Stacy L. Sherwood  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway  
Suite 300  
Columbia, MD 21044  
E-Mail: [sherwood@exeterassociates.com](mailto:sherwood@exeterassociates.com)

Timothy McHugh, Esquire  
Michael A. Gruin, Esquire  
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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/ Lauren E. Guerra  
Lauren E. Guerra  
Assistant Consumer Advocate  
PA Attorney I.D. # 323192  
E-Mail:[LGuerra@paoca.org](mailto:LGuerra@paoca.org)

Enclosures:

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

\*301742

CERTIFICATE OF SERVICE

Re: Petition of Duquesne Light Company :  
for Approval of its Act 129 Phase IV : Docket No. M-2020-3020818  
Energy Efficiency and Conservation Plan :

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 I, 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 31<sup>st</sup> day of December 2020.

**SERVICE BY E-MAIL ONLY**

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

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

Michael Zimmerman, Esquire  
Duquesne Light Company  
411 7<sup>th</sup> Avenue  
15<sup>th</sup> Floor  
Pittsburgh, PA 15219

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

Joseph L. Vullo, Esquire  
Commission on Economic Opportunity  
1460 Wyoming Avenue  
Forty Fort, PA 18704

/s/ Lauren E. Guerra

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Counsel for:  
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Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: December 31, 2020  
\*301743