

COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION COMMONWEALTH KEYSTONE BUILDING 400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF INVESTIGATION & ENFORCEMENT

May 3, 2021

Via Electronic Mail

Michael W. Gang, Esq. Anthony D. Kanagy, Esq. Post & Schell, Esq. Post & Schell, P.C. 17 North Second Street, 12th Floor Harrisburg, PA 17101-1601

Tishekia E. Williams, Esq. Michael Zimmerman, Esq. Emily Farah, Esq. Duquesne Light Company 411 Seventh Avenue, 16th Floor Pittsburgh, PA 15219

Re: Pennsylvania Public Utility Commission, v.

Duquesne Light Company Docket No. R-2021-3024750

I&E Data Requests

Dear Counsel:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Data Requests I&E-RS-1-D through I&E-RS-13-D - Sakaya** for the above-referenced proceeding. Please restate each Data Request before responding and start each Data Request and response on a separate page. The responses should identify the responding person(s).

The responses to these Data Requests are due within fifteen (15) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please provide your responses to me via email at the email address listed below.

Copies are being served on parties per the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic service*. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Scott B. Granger

Prosecutor

Bureau of Investigation and Enforcement

PA Attorney ID No. 63641

(717) 425-7593

sgranger@pa.gov

SBG/jfm Enclosures

cc: Rosemary Chiavetta, Secretary (Cover Letter and Certificate of Service only – via e-file)
Per Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission,

Docket No.: R-2021-3024750 v.

Duquesne Light Company

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Data Requests** dated May 3, 2021, in the manner and upon the person listed below.

Served via Electronic Mail Only

Ria M. Pereira, Esq. Sharon E. Webb, Esq. Office of Small Business Advocate Elizabeth R. Marx, Esq.

Forum Place John Sweet, Esq.

555 Walnut Street, 1st Floor Lauren N. Berman, Esq.

Harrisburg, PA 17101 Pennsylvania Utility Law Project

118 Locust Street swebb@pa.gov

Harrisburg, PA 17101-1414

pulp@palegalaid.net Counsel for CAUSE-PA Christy M. Appleby, Esq.

Phillip D. Demanchick, Esq. David T. Evrard, Esq.

Aron J. Beatty, Esq.

Joseph L. Vullo, Esq. Office of Consumer Advocate Burke Vullo Reilly Roberts

Forum Place

Forty Fort, PA 18704 555 Walnut Street, 5th Floor Harrisburg, PA 17101-1923 ilvullo@bvrrlaw.com

cappleby@paoca.org Counsel for CAAP

pdemanchick@paoca.org

devrard@paoca.org

Scott J. Rubin, Esq.

333 Oak Lane

abeatty@paoca.org William H. Roberts, II, Esq.

PNG Companies, LLC 374 North Shore Drive Pittsburgh, PA 15212

1460 Wyoming Avenue

Public Utility Consulting william.h.robertsII@peoples-gas.com

Counsel for

Peoples Natural Gas Company, LLC

Bloomsburg, PA 17815 scott.j.rubin@gmail.com Counsel for International Brotherhood of Electrical Workers, Local 29

Mark C. Szybist, Esq.
Natural Resources Defense Council
1152 15th Street NW, Suite 300
Washington, DC 20005
mszybist@nrdc.org
Counsel for NRDC

Derrick Price Williamson, Esq.
Barry A. Naum, Esq.
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
Counsel for
Wal-Mart Stores East, LP and
Sam's East, Inc.

Sarah Stoner, Esq.
Daniel Clearfield, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
sstoner@eckertseamans.com
dclearfield@eckertseamans.com
Counsel for KEEA

Matthew F. Smith, Esq.
Cozen O'Conner
One Oxford Centre
301 Grant Street, 26th Floor
Pittsburgh, PA 15219
mfsmith@cozen.com
Counsel for NRGP

Joseph Otis Minott, Esq.
Logan Welde, Esq.
Clean Air Council
135 S. 19th Street, Suite 300
Philadelphia, PA 19103
joe_minott@cleanair.org
lwelde@cleanair.org
Counsel for Clean Air Council

Emily Collins, Esq.
Fair Shake Environmental Legal Services
3495 Butler Street, Suite 102
Pittsburgh, PA 15201
ecollins@fairshake-els.org
Counsel for NRDC

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue, Suite 720-T
St. Louis, MO 63105
excel.consulting@sbcglobal.net
Consultant for OSBA

Scott B. Granger

Prosecutor

Bureau of Investigation and Enforcement

PA Attorney ID No. 63641