



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

June 23, 2020

**Via Electronic Mail**

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

Re: Petition of Duquesne Light Company for Approval of Default Service Plan for the  
Period of June 1, 2021 through May 31, 2025  
Docket No. P-2020-3019522  
**I&E Interrogatories**

Dear Counsel:

Enclosed please find a copy of the Bureau of Investigation and Enforcement's (I&E) **Interrogatories (nos. 2-4) – Grab**. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to these Interrogatories are due within ten (10) 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 of record 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](mailto:sgranger@pa.gov)

SBG/ac  
Enclosures

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for :  
Approval of Default Service Plan for the : Docket No. P-2020-3019522  
Period of June 1, 2021 through May 31, 2025 :

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Interrogatories** dated June 23, 2020,  
in the manner and upon the persons listed below.

**Served via Electronic Mail Only**

Michael W. Gang, Esq.  
Anthony D. Kanagy, Esq.  
Post & Schell, PC  
17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
[mgang@postschell.com](mailto:mgang@postschell.com)  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
*Counsel for Duquesne Light Company*

David T. Evrard, Esq.  
Aron J. Beatty, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
[devrard@paoca.org](mailto:devrard@paoca.org)  
[abeatty@paoca.org](mailto:abeatty@paoca.org)

Tishekia E. Williams, Esq.  
Michael Zimmerman, Esq.  
Emily Farah, Esq.  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219  
[twilliams@duqlight.com](mailto:twilliams@duqlight.com)  
[mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)  
[efarah@duqlight.com](mailto:efarah@duqlight.com)  
*Counsel for Duquesne Light Company*

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

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

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

Charles E. Thomas, Jr., Esq.  
Thoms Niesen & Thomas, LLC  
212 Locust Street  
Suite 302  
Harrisburg, PA 17101  
[cthomasjr@tntlawfirm.com](mailto:cthomasjr@tntlawfirm.com)  
*Counsel for MAREC Action*

Bruce H. Burcat, Esq.  
MAREC Action  
P.O. Box 385  
Camden, DE 19934  
[marec.org@gmail.com](mailto:marec.org@gmail.com)  
*Counsel for MAREC Action*

Gregory L. Peterson, Esq.  
Phillips Lytle LLP  
201 West Third Street  
Suite 205  
Jamestown, NY 14701-4907  
[gpeterson@phillipslytle.com](mailto:gpeterson@phillipslytle.com)  
*Counsel for StateWise*

Thomas F. Puchner, Esq.  
Phillips Lytle LLP  
Omni Plaza  
30 South Pearl Street  
Albany, NY 12207-1537  
[tpuchner@phillipslytle.com](mailto:tpuchner@phillipslytle.com)  
*Counsel for StateWise*

Kevin C. Blake, Esq.  
Phillips Lytle LLP  
125 Main Street  
Buffalo, NY 14203  
[kblake@phillipslytle.com](mailto:kblake@phillipslytle.com)  
*Counsel for StateWise*

James M. Van Nostrand, Esq.  
Keyes & Fox LLP  
275 Orchard Drive  
Pittsburgh, PA 15228  
[jvannostrand@keyesfox.com](mailto:jvannostrand@keyesfox.com)  
*Counsel for ChargePoint*

John F. Lushis, Esq.  
Norris McLaughlin, PA  
515 W. Hamilton  
Suite 502  
Allentown, PA 18101  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)  
*Counsel for Calpine Retail Holdings LLC*

James Laskey, Esq.  
Norris McLaughlin, PA  
400 Crossing Blvd, 8th Fl.  
Bridgewater, NJ 08807  
[jlasky@norris-law.com](mailto:jlasky@norris-law.com)  
*Counsel for Calpine Retail Holdings LLC*

Mark Szybist, Esq.  
Natural Resources Defense Council  
1152 15th Street, NW  
Suite 300  
Washington, DC 20005  
[mszybist@nrdc.org](mailto:mszybist@nrdc.org)  
*Counsel for NRDC*

Henry McKay, Program Director  
Solar United Neighbors of PA  
327 Whipple Street  
Pittsburgh, PA 15218  
[henry@solarunitedneighbors.org](mailto:henry@solarunitedneighbors.org)

Harry S. Geller, Esq.  
118 Locust Street  
Harrisburg, PA 17101  
[hgellerpulp@palegalaid.net](mailto:hgellerpulp@palegalaid.net)  
*Witness for CAUSE-PA*

Emily Collins, Esq.  
Andrew J. Karas, Esq.  
Fair Shake Environmental Legal Services  
647 E. Market Street  
Akron, OH 44304  
[ecollins@fairshake-els.org](mailto:ecollins@fairshake-els.org)  
[akaras@fairshake-els.org](mailto:akaras@fairshake-els.org)  
*Counsel for NRDC*

Barbara R. Alexander  
Barbara Alexander Consulting, LLC  
83 Wedgewood Drive  
Winthrop, ME 04364  
[barbalexand@gmail.com](mailto:barbalexand@gmail.com)  
*Witness for OCA*

Brian Kalcic  
Excel Consulting  
225 S. Meramec Avenue  
Suite 720T  
St. Louis, MO 63105  
[Excel.consulting@sbcglobal.net](mailto:Excel.consulting@sbcglobal.net)  
*Witness for OSBA*



Scott B. Granger  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 63641