

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001**

**POSTAL RATE AND FEE CHANGES**

**Docket No. R2001-1**

**KeySpan Energy's First Set Of  
Interrogatories And Document Production Requests  
To APWU Witness Michael J. Riley**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, KeySpan Energy submits the following interrogatories and document production requests to APWU witness **Michael J. Riley: KE/APWU-T1-1.**

Respectfully submitted,

**KeySpan Energy**

By: \_\_\_\_\_  
Michael W. Hall  
34693 Bloomfield Road  
Round Hill, Virginia 20141  
540-554-8880

Counsel for  
**KeySpan Energy**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing discovery request by email upon APWU, the United States Postal Service, the Designated Officer of the Commission, and participants who requested service of all discovery documents, in compliance with the Commission's Rules of Practice and POR 43.

Dated this 1st day of February 2002.

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Michael W. Hall

**KeySpan First Set Of Interrogatories And Document Production Requests  
To APWU Witness Michael J. Riley**

**KE/APWU-T1-1** Are you aware that USPS witness Miller changed the methodology for estimating QBRM cost savings from the methodology employed by the Commission in Docket No. R2000-1 less than one year prior to the time Mr. Miller filed his direct testimony in this case? If yes, please explain all of those changes, as you understand them, provide the separate impact of each such change upon measured QBRM cost savings, and provide copies of all workpapers or other documents prepared by you or under your direction and supervision prior to the date your Direct Testimony was filed that set forth or discuss an analysis of Mr. Miller's changes in the methodology for estimating QBRM cost savings. If no, please explain the extent to which you studied USPS witness Miller's derivation of QBRM cost savings.