### COMMONWEALTH OF PENNSYLVANIA



### OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560

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

May 19, 2016

Michael S. Swerling, Esquire Jack R. Garfinkle, Esquire Romulo L. Diaz, Jr., Esquire PECO Energy Company 2301 Market Street P.O. Box 8699 Philadelphia, PA 19101-8699

Re: Petition of PECO Energy Company (Electric

Operations) for Approval to Establish a
Distribution System Improvement Charge

Docket No. P-2015-2471423

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 seven (7) 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:

Jerry Mierzwa
Exeter Associates, Inc.
10480 Little Patuxent Parkway, Suite 300
Columbia, MD 21044
jmierzwa@exeterassociates.com

Michael S. Swerling, Esquire Jack R. Garfinkle, Esquire Romulo L. Diaz, Jr., Esquire May 19, 2016 Page 2

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/ Erin L. Gannon
Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
E-Mail: EGannon@paoca.org

### **Enclosures**

,

PUC Secretary Chiavetta, (letter and Certificate of Service only)

Certificate of Service

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#### CERTIFICATE OF SERVICE

Re: Petition of PECO Energy Company :

(Electric Operations) for Approval of

a Distribution System Improvement

Charge

Docket No. P-2015-2471423

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories, 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 19<sup>th</sup> day of May 2016

# SERVICE BY E-MAIL & INTER-OFFICE MAIL

Johnnie E. Simms, Director Bur. of Invest. & Enforcement Pa Public Utility Commission Commonwealth Keystone Bldg. 400 North Street

Harrisburg, PA 17101

Paul T. Diskin, Director Bureau of Technical Utility Services Pa Public Utility Commission Commonwealth Keystone Bldg. 400 North Street Harrisburg, PA 17101

# SERVICE BY EMAIL & FIRST CLASS MAIL, POSTAGE PAID

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John W. Norbeck, Esquire Citizens for Pennsylvania's Future 610 North Third Harrisburg, PA 17101

# /s/ Erin L. Gannon

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PA Attorney I.D. #83487
Email: <u>EGannon@paoca.org</u>

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