

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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July 6, 2016

Kenneth M. Kulak, Esquire  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103

Re: Petition of PECO Energy Company for  
(1) Approval of its Microgrid Integrated Technology  
Pilot Plan and (2) Issuance of a Declaratory Order  
Regarding the Recovery of Microgrid Costs  
Docket No. P-2016-2546452

Application for Construction of Microgrid  
Distribution Energy Resources Fueled by Natural Gas  
Docket No. A-2016-2546450

Dear Counsel:

Enclosed you will find two copies of Data Requests of the Office of Consumer Advocate, Set II, in the above-referenced proceeding.

In accordance with the modified Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within ten (10) 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 data requests as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Peter J. Lanzalotta  
Lanzalotta & Associates LLC  
67 Royal Pointe Drive  
Moss Creek Plantation  
Hilton Head Island, SC 29926  
E-mail: [petelanz@lanzalotta.com](mailto:petelanz@lanzalotta.com)

Kenneth M. Kulak, Esquire  
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If you have any questions, please call us. By copy of this letter, copies of these data requests have been served upon all parties. A certificate of service showing service of these data requests on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Respectfully submitted,

/s/ Lauren M. Burge  
Lauren M. Burge  
Assistant Consumer Advocate  
PA Attorney I.D. 311570

Enclosures

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

\*223434

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company for	:	
(1) Approval of its Microgrid Integrated	:	
Technology Pilot Plan and (2) Issuance of	:	Docket No. P-2016-2546452
A Declaratory Order Regarding the	:	
Recovery of Microgrid Costs	:	
Application for Construction of Microgrid	:	
Distribution Energy Resources fueled by	:	Docket No. A-2016-2546450
Natural Gas	:	

I hereby certify that I have this day served a true copy of the following documents, the Office of Consumer Advocate's Interrogatories to PECO – Set II, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 6<sup>th</sup> day of July 2016.

SERVICE BY HAND DELIVERY and FIRST CLASS MAIL

Phillip C. Kirchner, Esquire  
Bureau of Investigation & Enforcement  
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Harrisburg, PA 17120

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Sarah C. Stoner, Esquire  
Eckert Seamans Cherin & Mellott LLC  
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P.O. Box 1248  
Harrisburg, PA 17101  
*Direct Energy/RESA*

/s/ Lauren M. Burge

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