

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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July 18, 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 IV, 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.

Please note that the company has marked these documents as proprietary, but the OCA reserves the right to challenge such treatment.

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

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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
E-Mail: LBurge@paoca.org

Enclosures

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

*223842

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 Proprietary Interrogatories to PECO – Set IV, 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 18th day of July 2016.

SERVICE BY HAND DELIVERY and FIRST CLASS MAIL

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

SERVICE BY E-MAIL and FIRST CLASS MAIL

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Direct Energy/RESA

/s/ Lauren M. Burge
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