#### **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 29, 2018

Kenneth M. Kulak, Esquire Morgan, Lewis & Bockius LLP 1701 Market Street Philadelphia, PA 19101

Re: Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Division Docket No. R-2018-3000164

Dear Mr. Kulak:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set X, in the above-referenced proceeding.

In accordance with the May 10, 2018 Prehearing Order, 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 interrogatories as soon as possible.

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

Clarence L. Johnson CJEnergy Consulting 3707 Robinson Avenue Austin, TX 78722 cjenergyconsult@att.net Kenneth M. Kulak, Esquire May 29, 2018 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).

Respectfully Submitted,

Christy M. Appleby

Assistant Consumer Advocate

PA Attorney I.D. #85824

E-Mail: CAppleby@paoca.org

### Enclosures

cc:

PUC Secretary Chiavetta (letter and Certificate of Service only)

Certificate of Service

250303

#### CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission

V.

Docket No. R-2018-3000164

PECO Energy Company

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories Set X, upon parties of record in this processing 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 29th day of May 2018.

## SERVICE BY E-MAIL & INTER-OFFICE MAIL

Carrie B. Wright, Esquire Bureau of Investigation & Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120

# SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

Elizabeth Rose Triscari Deputy Small Business Advocate Pennsylvania Office of Small Business Advocate 300 North Street, Suite 202 Harrisburg, PA 17101

Patrick M. Cicero, Esquire Elizabeth R. Marx, Esquire Kadeem G. Morris, Esquire 118 Locust Street Harrisburg, PA 17101

Scott J. Rubin, Esquire 333 Oak Lane Bloomsburg, PA 17815 Romula L. Diaz, Jr., Esquire Jack R. Garfinkle, Esquire W. Craig Williams, Esquire Michael S. Swerling, Esquire PECO Energy Company 2301 Market Street P.O. Box 8699 Philadelphia, PA 19101

Kenneth M. Kulak, Esquire Anthony C. DeCusatis, Esquire Catherine G Vasudevan, Esquire Morgan, Lewis & Brockius LLP 1701 Market Street Philadelphia, PA 19101 David P. Zambito, Esquire Cozen O'Conner 17 North Second Street Suite 1410 Harrisburg, PA 17101

Joline R. Price, Esquire Community Legal Services, Inc. 1424 Chestnut Street Philadelphia, PA 19102

Mark C. Hammond, Esquire Land Air Water Legal Solutions, LLC 1000 Westlakes Dr., Suite 150 Berwyn, PA 19312

Donald R. Wagner, Esquire Stevens & Lee 111 North 6<sup>th</sup> Street Reading, PA 19601

Charles E. Thomas III, Esquire THOMAS, NIESEN & THOMAS< LLC 212 Locust Street, Suite 302 Harrisburg, PA 17101

Derrick Price Williamson Barry A. Naum Spilman Thomas & Battle, PLLC 1100 Bent Creek Boulevard, Suite 101 Mechanicsburg, PA 17050

Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. #85824
E-Mail: CAppleby@paoca.org

Hayley E. Dunn Assistant Consumer Advocate PA Attorney I.D. # 324763 E-Mail: HDunn@paoca.org Karen O. Moury, Esquire Eckert Seamans Cherin & Mellott 213 Market Street, 8<sup>th</sup> Floor Harrisburg, PA 17101 Counsel for NRG

Joseph L. Vullo, Esquire 1460 Wyoming Avenue Forty Fort, PA 18704

Deanne O'Dell, Esquire Eckert Seamans Cherin & Mellott 213 Market Street, 8<sup>th</sup> Floor Harrisburg, PA 17101 Counsel for RESA

Charis Mincavage, Esquire Adeolu Bakare, Esquire Alessandra Hylander, Esquire McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108 Aron J. Beatty Senior Assistant Consumer Advocate PA Attorney I.D. # 86625 E-Mail: ABeatty@paoca.org

Counsel for:
Office of Consumer Advocate
555 Walnut Street
5<sup>th</sup> Floor, Forum Place
Harrisburg, PA 17101
Phone: (717) 780-4514
Fax: (717) 783-7152