



An Exelon Company

W. Craig Williams
Assistant General Counsel
2301 Market Street / S23-1
Philadelphia, PA 19103

Direct Dial: 215-841-5974

June 8, 2018

VIA eFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

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

Dear Secretary Chiavetta:

Enclosed please find, in the above-referenced matter, the **Objections of PECO Energy Company to the Interrogatories and Requests for Production of Documents Propounded by Laborers' International Union of North America, Local 57 (Set I)**.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Craig Williams", with a long horizontal flourish extending to the right.

W. Craig Williams

Enclosures

c: Per Certificate of Service (w/encls.)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	
v.	:	DOCKET NO. R-2018-3000164
	:	
PECO ENERGY COMPANY	:	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the **Objections of PECO Energy Company to the Interrogatories and Requests for Production of Documents Propounded by Laborers' International Union of North America, Local 57 (Set I)** on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

Honorable Christopher P. Pell
Deputy Chief Administrative Law Judge
Office of Administrative Law Judge
801 Market Street, Suite 4063
Philadelphia, PA 19107
cpell@pa.gov

Honorable F. Joseph Brady
Administrative Law Judge
Office of Administrative Law Judge
801 Market Street, Suite 4063
Philadelphia, PA 19107
fbrady@pa.gov

Carrie B. Wright
Prosecutor
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120
carwright@pa.gov

Elizabeth Rose Triscari
Deputy Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
etriscari@pa.gov

Christy M. Appleby
Hayley Dunn
Assistant Consumer Advocates
Aron J. Beatty
Senior Assistant Consume Advocate
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1923
cappleby@paoca.org
hdunn@paoca.org
abeatty@paoca.org

Patrick M. Cicero
Elizabeth R. Marx
Kadeem G. Morris
John W. Sweet
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Counsel for CAUSE-PA

Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815-2036
scott.j.rubin@gmail.com
Counsel for IBEW

David P. Zambito
Jonathan P. Nase
Cozen & O'Connor
Suite 1410
17 North Second Street
Harrisburg, PA 17101
dzambito@cozen.com
jnase@cozen.com
*Counsel for The Trustees of the
University of Pennsylvania*

Roman Petyk, Assoc. General Counsel
The University of Pennsylvania
Office of General Counsel
2929 Walnut Street
FMC Tower, Suite 400
Philadelphia, PA 19104-5099
Roman.petyk@ogc.upenn.edu
Counsel for University of Pennsylvania

Gregory W. Tillman
Walmart Inc.
2001 Southeast 10th Street
Bentonville, Reliant 72716-5530
greg.tillman@walmart.com

Karen O. Moury
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
kmoury@eckertseamans.com
Counsel for NRG Energy

Charles T. Joyce
Spear Wilderman, P.C.
230 South Broad Street, Suite 1400
Philadelphia, PA 19102
ctjoyce@spearwilderman.com
Counsel for IBEW

Joseph L. Vullo
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
Counsel for CAAP

Charis Mincavage
Adeolu Bakare
Alessandra Hylander
McNees Wallace & Nurick LLC
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17101-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
ahylander@mcneeslaw.com
Counsel for PAIEUG

Donald R. Wagner
Linda R. Evers
Michael A. Gruin
Stevens & Lee
111 N. Sixth Street
Reading, PA 19601
drw@stevenslee.com
lre@stevenslee.com
mag@stevenslee.com
Counsel for WalMart

Joline R. Price
Robert W. Ballenger
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
jprice@clsphila.org
rballenger@clsphila.org
Counsel for TURN et al.

Derrick Price Williamson
Barry A. Naum
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
Counsel for ArcelorMittal

Mark C. Hammond
Land Air Water Legal Solutions, LLC
1000 Westlakes Dr., Suite 150
Berwyn, PA 19312
mhammond@landairwater.com
Counsel for Tesla

Mark Belland
O'Brien, Belland, & Bushinsky, LLC
500-506 North 6th Street
Philadelphia, PA 19123
mbelland@obbbllaw.com
Counsel for LIUNA

Mary Va Lor
LIUNA
905 16th Street NW
Washington, DC 20016
mlor@liuna.org

Becky Merola
Calpine Energy Solutions, LLC
5325 Sheffield Avenue
Powell, Ohio 43065
becky.merola@calpinesolutions.com

Charles E. Thomas III
THOMAS, NIESEN & THOMAS, LLC
212 Locust Street, Suite 302
Harrisburg, PA 17101
cet3@tntlawfirm.com
Counsel for Calpine Solutions

Deanne M. O'Dell
Sarah C. Stoner
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com
sstoner@eckertseamans.com
Counsel for RESA

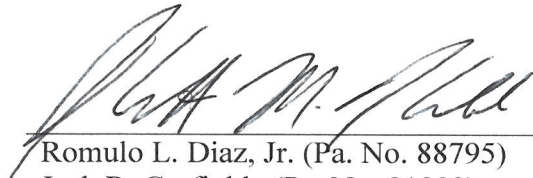
David J. Effron
Berkshire Consulting Services
12 Pond Path
Northampton, NH 03862
djeffron@aol.com
Consultant for OCA

Roger D. Colton
Fisher, Sheehan & Colton
34 Warwick Road
Belmont, MA 02478
roger@fsconline.com
Consultant for OCA

Clarence L. Johnson
CJEnergy Consulting
3707 Robinson Avenue
Austin, TX 78722
cjenergyconsult@att.net
Consultant for OCA

David S. Habr
Habr Economics
213 Cornuta Way
Nipomo, CA 93444-5020
david.habr@habreconomics.com
Consultant for OCA

Brian Kalcic
Excel Consulting
Suite 720-T
225 South Meramac Avenue
St. Louis, MO 63105
excel.consulting@sbcglobal.net
Consultant for OSBA



Romulo L. Diaz, Jr. (Pa. No. 88795)
Jack R. Garfinkle (Pa. No. 81892)
W. Craig Williams (Pa. No. 306405)
Michael S. Swerling (Pa. No. 94748)
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103
215.841.5974 (dir)
215.568.3389 (fax)
romulo.diaz@exeloncorp.com
jack.garfinkle@exeloncorp.com
craig.williams@exeloncorp.com
michael.swerling@exeloncorp.com

Kenneth M. Kulak (Pa. No. 75509)
Anthony C. DeCusatis (Pa. No. 25700)
Catherine G. Vasudevan (Pa. No. 210254)
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103
215.963.5384 (dir)
215.963.5001 (fax)
ken.kulak@morganlewis.com
anthony.decusatis@morganlewis.com
catherine.vasudevan@morganlewis.com

Dated: June 8, 2018

Counsel for PECO Energy Company