

# Morgan Lewis

**Kenneth M. Kulak**

Partner  
+1.215.963.5384  
ken.kulak@morganlewis.com

June 14, 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, a Certificate of Service evidencing service of **PECO Energy Company's Responses to the Interrogatories of the Bureau of Investigation & Enforcement, Set IX-RE, Nos. I&E-IX-RE-79 through I&E-IX-RE-81.**

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

Very truly yours,



Kenneth M. Kulak

KMK/ap  
Enclosures

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

**Morgan, Lewis & Bockius LLP**

1701 Market Street  
Philadelphia, PA 19103-2921  
United States

📞 +1.215.963.5000  
📠 +1.215.963.5001

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of **PECO Energy Company's Responses to the Interrogatories of the Bureau of Investigation & Enforcement, Set IX-RE, Nos. I&E-IX-RE-79 through I&E-IX-RE-81** on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA ELECTRONIC MAIL, eROOM AND/OR FIRST CLASS MAIL**

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](mailto: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](mailto:etriscari@pa.gov)

Christy M. Appleby  
Hayley Dunn  
Assistant Consumer Advocates  
Aron J. Beatty  
Senior Assistant Consume Advocate  
Office of Consumer Advocate  
Forum Place, 5<sup>th</sup> Floor  
555 Walnut Street  
Harrisburg, PA 17101-1923  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[hdunn@paoca.org](mailto:hdunn@paoca.org)  
[abeatty@paoca.org](mailto: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](mailto:pulp@palegalaid.net)  
*Counsel for CAUSE-PA*

Scott J. Rubin  
333 Oak Lane  
Bloomsburg, PA 17815-2036  
[scott.j.rubin@gmail.com](mailto:scott.j.rubin@gmail.com)  
*Counsel for IBEW*

Charles T. Joyce  
Spear Wilderman, P.C.  
230 South Broad Street, Suite 1400  
Philadelphia, PA 19102  
[ctjoyce@spearwilderman.com](mailto:ctjoyce@spearwilderman.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](mailto:dzambito@cozen.com)  
[jnase@cozen.com](mailto:jnase@cozen.com)  
*Counsel for The Trustees of the  
University of Pennsylvania*

Joseph L. Vullo  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Counsel for CAAP*

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](mailto:Roman.petyk@ogc.upenn.edu)  
*Counsel for University of Pennsylvania*

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

Gregory W. Tillman  
Walmart Inc.  
2001 Southeast 10<sup>th</sup> Street  
Bentonville, Reliant 72716-5530  
[greg.tillman@walmart.com](mailto:greg.tillman@walmart.com)

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

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

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

Becky Merola  
Calpine Energy Solutions, LLC  
5325 Sheffield Avenue  
Powell, Ohio 43065  
[becky.merola@calpinesolutions.com](mailto:becky.merola@calpinesolutions.com)

Mark Belland  
O'Brien, Belland, & Bushinsky, LLC  
500-506 North 6th Street  
Philadelphia, PA 19123  
[mbelland@obbblaw.com](mailto:mbelland@obbblaw.com)  
*Counsel for LIUNA*

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

Roger D. Colton  
Fisher, Sheehan & Colton  
34 Warwick Road  
Belmont, MA 02478  
[roger@fsconline.com](mailto:roger@fsconline.com)  
*Consultant for OCA*

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

Mark C. Hammond  
Land Air Water Legal Solutions, LLC  
1000 Westlakes Dr., Suite 150  
Berwyn, PA 19312  
[mhammond@landairwater.com](mailto:mhammond@landairwater.com)  
*Counsel for Tesla*

Charles E. Thomas, III  
THOMAS, NIESEN & THOMAS, LLC  
212 Locust Street, Suite 302  
Harrisburg, PA 17101  
[cet3@tntlawfirm.com](mailto:cet3@tntlawfirm.com)  
*Counsel for Calpine Solutions*

Mary Va Lor  
LIUNA  
905 16th Street NW  
Washington, DC 20016  
[mlor@liuna.org](mailto:mlor@liuna.org)

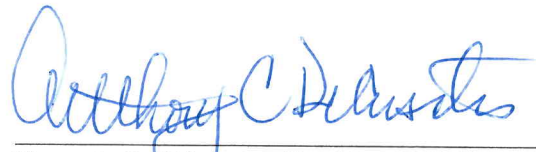
David J. Effron  
Berkshire Consulting Services  
12 Pond Path  
Northampton, NH 03862  
[djeffron@aol.com](mailto:djeffron@aol.com)  
*Consultant for OCA*

Clarence L. Johnson  
CJEnergy Consulting  
3707 Robinson Avenue  
Austin, TX 78722  
[cjenergyconsult@att.net](mailto:cjenergyconsult@att.net)  
*Consultant for OCA*

David S. Habr  
Habr Economics  
213 Cornuta Way  
Nipomo, CA 93444-5020  
[david.habr@habreconomics.com](mailto: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](mailto:excel.consulting@sbcglobal.net)  
*Consultant for OSBA*

Jeffrey Pollock  
J. Pollock, Inc.  
12647 Olive Boulevard, Suite 585  
St. Louis, MO 63141  
[jcp@jpollockinc.com](mailto:jcp@jpollockinc.com)  
*Consultant for PAIEUG*



---

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](mailto:romulo.diaz@exeloncorp.com)  
[jack.garfinkle@exeloncorp.com](mailto:jack.garfinkle@exeloncorp.com)  
[craig.williams@exeloncorp.com](mailto:craig.williams@exeloncorp.com)  
[michael.swerling@exeloncorp.com](mailto: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](mailto:ken.kulak@morganlewis.com)  
[anthony.decusatis@morganlewis.com](mailto:anthony.decusatis@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)

*Counsel for PECO Energy Company*

Dated: June 14, 2018