



COMMONWEALTH OF PENNSYLVANIA

July 9, 2018

Kenneth M. Kulak, Esquire  
Anthony C. DeCusatis, Esquire  
Catherine G. Vasudevan, Esquire  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103

Romulo L. Diaz, Jr., Esquire  
Jack R. Garfinkle, Esquire  
W. Craig Williams, Esquire  
Michael S. Swerling, Esquire  
PECO Energy Company  
2301 Market Street  
PO Box 8699  
Philadelphia, PA 19101

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

Dear Counsel:

Enclosed please find the Responses of the Office of Small Business Advocate (“OSBA”), to PECO Energy Company – Electric Division’s Interrogatories, Set II, in the above-referenced proceeding.

Copies of these Responses to Interrogatories will be served upon all parties, as indicated on the attached Certificate of Service. Additionally, this Certificate of Service has been electronically filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission, as required by 52 Pa. Code § 5.341(b).

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

Sincerely,

Elizabeth Rose Triscari  
Deputy Small Business Advocate  
Attorney ID No. 306921

*Enclosures*

cc: PA PUC Secretary Rosemary Chiavetta (Cover Letter & Certificate of Service only)  
Brian Kalcic  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	
<b>v.</b>	:	<b>Docket No. R-2018-3000164</b>
	:	<b>C-2018-3001043</b>
<b>PECO Energy Company – Electric Division</b>	:	
	:	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Christy M. Appleby, Esquire  
Hayley Dunn, Esquire  
Aron J. Beatty, Esquire  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101  
[CAppleby@paoca.org](mailto:CAppleby@paoca.org)  
[HDunn@paoca.org](mailto:HDunn@paoca.org)  
[ABeatty@paoca.org](mailto:ABeatty@paoca.org)  
(Counsel for OCA)  
(Email and Hand Delivery)

Carrie B. Wright, Esquire  
Bureau of Investigation & Enforcement  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[carwright@pa.gov](mailto:carwright@pa.gov)  
(Counsel for BIE)  
(Email and Hand Delivery)

Kenneth M. Kulak, Esquire  
Anthony C. DeCusatis, Esquire  
Catherine G. Vasudevan, Esquire  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103  
[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)

Romulo L. Diaz, Jr., Esquire  
Jack R. Garfinkle, Esquire  
W. Craig Williams, Esquire  
Michael S. Swerling, Esquire  
PECO Energy Company  
2301 Market Street  
PO Box 8699  
Philadelphia, PA 19101  
[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)  
(Counsel for PECO)

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

Scott J. Rubin, Esquire  
333 Oak Lane  
Bloomsburg, PA 17815  
[scott.j.rubin@gmail.com](mailto:scott.j.rubin@gmail.com)  
(Counsel for IBEW Local 614)

Charles T. Joyce, Esquire  
Spear Wilderman, P.C.  
230 South Broad Street, Suite 1400  
Philadelphia, PA 19102  
[ctjoyce@spearwilderman.com](mailto:ctjoyce@spearwilderman.com)  
(Counsel for IBEW Local 614)

Joseph L. Vullo, Esquire  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jvullo@bvrrlaw.com](mailto:jvullo@bvrrlaw.com)  
(Counsel for Community Action Assoc. of PA)

Charis Mincavage, Esquire  
Adeolu Bakare, Esquire  
Alessandra Hylander, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[ahylander@mcneeslaw.com](mailto:ahylander@mcneeslaw.com)  
(Counsel for PAIEUG)

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

Joline R. Price, Esquire  
Robert W. Ballenger, Esquire  
Community Legal Services  
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.)

Harry S. Geller, Esquire  
118 Locust Street  
Harrisburg, PA 17101  
[hgellerpulp@palegalaid.net](mailto:hgellerpulp@palegalaid.net)  
(Expert Witness for TURN, et al.)

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

Donald R. Wagner, Esquire  
Linda R. Evers, Esquire  
Michael A. Gruin, Esquire  
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 Wal-Mart)

Greg Tillman  
Walmart Inc.  
2001 Southeast 10<sup>th</sup> Street  
Bentonville, AR 72716  
[Greg.tillman@walmart.com](mailto:Greg.tillman@walmart.com)  
(Representative of Wal-Mart)  
(Via Email Only)

David P. Zambito, Esquire  
Jonathan P. Nase, Esquire  
Cozen O'Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101  
[dzambito@cozen.com](mailto:dzambito@cozen.com)  
[jnase@cozen.com](mailto:jnase@cozen.com)  
(Counsel for Trustees of the University of PA)

Roman Petyk, Esquire  
The University of Pennsylvania  
Office of General Counsel  
2929 Walnut Street  
FMC Tower, Suite 400  
Philadelphia, PA 19104  
[roman.petyk@ogc.upenn.edu](mailto:roman.petyk@ogc.upenn.edu)  
(Counsel for Trustees of the University of PA)

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

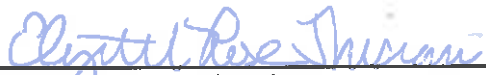
Karen O. Moury, Esquire  
Kristine E. Marsilio, Esquire  
Eckert Seamans Cherin & Mellot, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
[kmarsilio@eckertseamans.com](mailto:kmarsilio@eckertseamans.com)  
(Counsel for NRG)

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

Becky Merola  
Calpine Energy Solutions, LLC  
5325 Sheffield Avenue  
Powell, OH 43065  
[Becky.Merola@calpinesolutions.com](mailto:Becky.Merola@calpinesolutions.com)  
(Director, Calpine Solutions)  
(Via Email Only)

Derrick Price Williamson, Esquire  
Barry A. Naum, Esquire  
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)

DATE: July 9, 2018

  
Elizabeth Rose Triscari  
Deputy Small Business Advocate  
Attorney I.D. No. 306921