### **COMMONWEALTH OF PENNSYLVANIA**



#### OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560

May 11, 2020

0

@pa\_oca



FAX (717) 783-7152 consumer@paoca.org

# Via Electronic Mail Only

Kenneth M. Kulak, Esquire Anthony C. DeCusatis, Esquire Catherine G. Vasudevan, Esquire Brooke E. McGlinn, Esquire Morgan, Lewis & Bockius LLP 1701 Market Street Philadelphia, PA 19103-2921

Re:

Petition of PECO Energy Company for Approval of a Default Service Program for the Period of June 21, 2021 through May 31, 2025 Docket No. P-2020-3019290

### Dear Counsel:

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

In accordance with the 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 interrogatories as soon as possible.

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

Barbara R. Alexander
Barbara Alexander Consulting LLC
83 Wedgewood Drive
Winthrop, ME 04364
E-Mail: barbalexand@gmail.com

Kenneth M. Kulak, Esquire Anthony C. DeCusatis, Esquire Catherine G. Vasudevan, Esquire Brooke E. McGlinn, Esquire May 11, 2020 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).

Sincerely,

/s/ David T. Evrard
David T. Evrard
Assistant Consumer Advocate
PA Attorney I.D. # 33870
E-Mail: DEvrard@paoca.org

## Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service only)
Certificate of Service
\*288157

#### CERTIFICATE OF SERVICE

Re: Petition of PECO Energy Company for Approval

of a Default Service Program for the Period of : Docket No. P-2020-3019290

June 1, 2021 through May 31, 2025 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to PECO Energy Company – Electric Division, Set I, upon parties of record in this proceeding 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 11<sup>th</sup> day of May 2020.

# **SERVICE BY E-MAIL ONLY**

Richard A. Kanaskie, Esquire Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2<sup>nd</sup> Floor Harrisburg, PA 17120

Kenneth M. Kulak, Esquire Anthony C. DeCusatis, Esquire Catherine G. Vasudevan, Esquire Brooke E. McGlinn, Esquire Morgan, Lewis & Bockius LLP 1701 Market Street Philadelphia, PA 19103-2921

Elizabeth R. Marx, Esquire John Sweet, Esquire Ria Pereira, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101

Christopher O'Hara, Esquire Vice President, General Counsel PJM Interconnection 2750 Monroe Boulevard Audubon, PA 19403-2497 Erin K. Fure, Esquire
Daniel G. Asmus, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923

Charis Mincavage, Esquire Adeolu A. Bakare, Esquire Jo-Anne S. Thompson, Esquire McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166

W. Craig Williams, Esquire Anthony Gay, Esquire Jack Garfinkle, Esquire Exelon Business Services Company 2301 Market Street, S23-1 P.O. Box 8699 Philadelphia, PA 19101-8699

John F. Lushis, Jr., Esquire Norris McLaughlin, P.A. 515 W. Hamilton Street Suite 502 Allentown, PA 1810 Robert W. Ballenger, Esquire Josie B. H. Pickens, Esquire Joline R. Price, Esquire Community Legal Services, Inc. 1424 Chestnut Street Philadelphia, PA 19102

Gregory L. Peterson, Esquire Phillips Lytle LLP 201 West Third Street Suite 205 Jamestown, NY 14701-4907

Joseph Otis Minott, Esquire Ernest Logan Welde, Esquire Clean Air Council 135 S. 19th Street Suite 300 Philadelphia, Pennsylvania 19103 Brian Kalcic Excel Consulting 225 S. Meramec Avenue Suite 720 T St. Louis, MO 63105

Karen O. Moury, Esquire Deanne M O'Dell, Esquire Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8<sup>th</sup> Floor P.O. Box 1248 Harrisburg, PA 17101

/s/ David T. Evrard

David T. Evrard Assistant Consumer Advocate PA Attorney I.D. # 33870 E-Mail: DEvrard@paoca.org

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 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152

Dated: May 11, 2020

\*288142