## **COMMONWEALTH OF PENNSYLVANIA**



## OFFICE OF CONSUMER ADVOCATE

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

June 5, 2020



@pa oca



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

Via Electronic Mail Only

Pamela C. Polacek, Esquire Adeolu A. Bakare, Esquire Matthew L. Garber, Esquire McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166

Re:

Joint Default Service Plan for Citizens' Electric

Company of Lewisburg, PA and Wellsboro Electric Company for the Period June 1, 2021

through May 21, 2025

Docket Nos. P-2020-3019383

P-2020-3019384

### 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:

Serhan Ogur Exeter Associates, Inc. 10480 Little Patuxent Parkway Suite 300 Columbia, MD 21044-2690

E-Mail: sogur@exeterassociates.com

Pamela C. Polacek, Esquire Adeolu A. Bakare, Esquire Matthew L. Garber, Esquire June 5, 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

\*289604

#### CERTIFICATE OF SERVICE

Re: Joint Default Service Plan for Citizens' Electric

Company of Lewisburg, PA and Wellsboro : Docket Nos. P-2020-3019383 Electric Company for the Period June 1, 2021 : P-2020-3019384

through May 21, 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 Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company, 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 5<sup>th</sup> day of June 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

Erin K. Fure, Esquire

Office of Small Business Advocate

555 Walnut Street

1<sup>st</sup> Floor, Forum Place

Harrisburg, PA 17101-1923

Pamela C. Polacek, Esquire

Adeolu A. Bakare, Esquire

Matthew L. Garber, Esquire

McNees Wallace & Nurick LLC

100 Pine Street

Christopher O'Hara, Esquire

Office of General Counsel

PJM Interconnection, L.L.C.

P.O. Box 1525

Southeastern, PA 19399-1525

P.O. Box 1166 Harrisburg, PA 17108-1166

Brian Kalcic Robert L. Douglas, Vice President
Excel Consulting MP2 Energy NE, LLC
225 South Meramec Avenue 24 Waterway Avenue
Suite 720 Suite 625
St. Louis, MO 63105 The Woodlands, TX 77380

Perry S. Oman, President Muirfield Energy, Inc. 5850 Venture Drive Suite C Dublin, OH 43017

/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

PA Attorney I.D. # 86625 Dated: June 5 E-Mail: <u>ABeatty@paoca.org</u> \*289596

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: June 5, 2020