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 8, 2020



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 II, in the above-referenced proceedings.

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 8, 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

*289808

CERTIFICATE OF SERVICE

Re: Joint Default Service Plan for Citizens' Electric

> Docket Nos. P-2020-3019383 Company of Lewisburg, PA and Wellsboro 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 II, 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 8th day of June 2020.

SERVICE BY E-MAIL ONLY

Erin K. Fure, Esquire

1st Floor, Forum Place

Harrisburg, PA 17101-1923

555 Walnut Street

Office of Small Business Advocate

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

Christopher O'Hara, Esquire Pamela C. Polacek, Esquire Adeolu A. Bakare, Esquire Office of General Counsel Matthew L. Garber, Esquire PJM Interconnection, L.L.C. McNees Wallace & Nurick LLC P.O. Box 1525 100 Pine Street 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

The Woodlands, TX 77380 St. Louis, MO 63105 Perry S. Oman, President

Muirfield Energy, Inc. 5850 Venture Drive Suite C Dublin, OH 43017

/s/ David T. Evrard

David T. Evrard Counsel for: Office of Consumer Advocate Assistant Consumer Advocate PA Attorney I.D. # 33870 555 Walnut Street

5th Floor, Forum Place E-Mail: <u>DEvrard@paoca.org</u> Harrisburg, PA 17101-1923

Phone: (717) 783-5048 Aron J. Beatty Senior Assistant Consumer Advocate Fax: (717) 783-7152 PA Attorney I.D. # 86625 Dated: June 8, 2020

E-Mail: ABeatty@paoca.org *289807