



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Main Fax  
www.postschell.com

---

Lindsay A. Berkstresser

lberkstresser@postschell.com  
717-612-6021 Direct  
717-731-1977 Direct Fax  
File #: 178868

June 15, 2020

***VIA E-MAIL ONLY***

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

**Re: Petition of PPL Electric Utilities Corporation for Approval of Its Default Service Plan for the Period of June 1, 2021 Through May 31, 2025**  
**Docket No. P-2020-3019356**

---

Dear Counsel:

Attached please find the responses of PPL Electric Utilities Corporation (“PPL”) to the discovery requests of the CAUSE-PA, Set I, in the above-referenced proceeding. Copies will be provided per the Certificate of Service.

Very truly yours,

Lindsay A. Berkstresser

LAB/kl  
Attachments

cc: Rosemary Chiavetta, Secretary (*letter and Certificate of Service only*)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant) and the Pennsylvania Public Utility Commission's March 20, 2020 Emergency Order at Docket No. M-2020-3019262.

### VIA E-MAIL

David T. Evrard, Esquire  
Aron J. Beatty, Esquire  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[devrard@paoca.org](mailto:devrard@paoca.org)  
[abeatty@paoca.org](mailto:abeatty@paoca.org)

Gina L. Miller, Esquire  
PA Public Utility Commission  
Bureau of Investigation & Enforcement  
400 North Street, 2<sup>nd</sup> Floor West  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)

Steven C. Gray, Esquire  
Office of Small Business Advocate  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

Todd S. Stewart, Esquire  
Hawke McKeon & Sniscak LLP  
100 N. 10th Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
*Counsel for Intervenors  
EGS Parties*

Kenneth L. Mickens, Esquire  
316 Yorkshire Drive  
Harrisburg, PA 17111  
[Kmickens11@verizon.net](mailto:Kmickens11@verizon.net)  
*Counsel for Intervenor  
Sustainable Energy Fund*

Pamela Polacek, Esquire  
Adeolu A. Bakare, Esquire  
Jo-Anne S. Thompson, Esquire  
McNees, Wallace & Nurick  
P.O. Box 1166  
100 Pine Street  
Harrisburg, PA 17108-1166  
[ppolachek@mcneeslaw.com](mailto:ppolachek@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[jthompson@mcneeslaw.com](mailto:jthompson@mcneeslaw.com)  
*Counsel for Intervenor PPLICA*

Elizabeth R. Marx, Esquire  
John W. Sweet, Esquire  
Ria Pereira, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[emarxpulp@palegalaid.net](mailto:emarxpulp@palegalaid.net)  
*Counsel for Intervenor CAUSE-PA*

Deanne M. O'Dell, Esquire  
Kristine E. Marsilio, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[kmarsilio@eckertseamans.com](mailto:kmarsilio@eckertseamans.com)  
*Counsel for Intervenor RESA*

Gregory L. Peterson, Esquire  
Thomas F. Puchner, Esquire  
Kevin C. Blake, Esquire  
Phillips Lytle LLP  
201 West Third Street, Suite 205  
Jamestown, NY 14701-4907  
[gpeterson@phillipslytle.com](mailto:gpeterson@phillipslytle.com)  
*Counsel for Intervenor StateWise*

Derrick Price Williamson, Esquire  
Barry A. Naum, Esquire  
Spilman Thomas & Battle  
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 Intervenor IECPA*

Robert D. Knecht  
Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)  
*Consultant for OSBA*

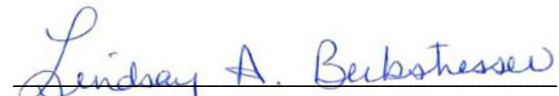
Barbara Alexander  
Consumer Affairs Consultant  
83 Wedgewood Drive  
Winthrop, ME 04364  
[barbalex@ctel.net](mailto:barbalex@ctel.net)  
*Consultant for OCA*

John F. Lushis, Jr., Esquire  
Norris McLaughlin P.A.  
515 West Hamilton Street, Suite 502  
Allentown, PA 18101  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)  
*Counsel for Intervenor Calpine Retail Holdings LLC*

Lauren M. Burge, Esquire  
Deanne M. O'Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
600 Grant Street, 44<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)  
*Counsel for Intervenor Inspire Energy*

Dr. Steven L. Estomin  
Dr. Serhan Ogur  
Exeter Associates, Inc., Suite 300  
10480 Little Patuxent Parkway  
Columbia, MD 21044  
[sogur@exeterassociates.com](mailto:sogur@exeterassociates.com)  
[sestomin@exeterassociates.com](mailto:sestomin@exeterassociates.com)  
*Consultants for OCA*

Date: June 15, 2020

  
Lindsay A. Berkstresser