

Todd S. Stewart

Office: 717 236-1300 x242 Direct: 717 703-0806 tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

July 27, 2020

VIA ELECTRONIC MAIL

pulp@palegalaid.net

Elizabeth R. Marx, Esquire John 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 From June 1, 2021 through May 31, 2025, Docket No. P-2020-3019356; RESPONSE OF THE EGS PARTIES' INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA (CAUSE-PA), SET I

Dear Counsel:

Please find enclosed the Response of the EGS Parties' Interrogatories and Request for Production of Documents Propounded by the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), Set I in the above-captioned proceeding. Copies of the Response have been served in accordance with the attached Certificate of Service.

If you have any questions, please do not he sitate to contact the.

Todd S. Stewart

Counsel for EGS Parties

TSS/jld Enclosures

cc: Rosemary Chiavetta, Secretary (via efile Ltr and COS only)

Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party)

VIA ELECTRONIC MAIL ONLY

Michael W. Hassell, Esquire
Lindsay A. Berkstresser, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
mhassell@postschell.com
lberkstresser@postschell.com
Counsel for PPL Electric Utilities Corporation

Kimberly A. Klock, Esquire Michael J. Shafer, Esquire PPL Services Corporation Two North Ninth Street Allentown, PA 18101 kklock@pplweb.com mjshafer@pplweb.com

Counsel for PPL Electric Utilities Corporation

James Laskey Norris McLaughlin, P.A. 400 Crossing Blvd., 8th Floor Bridgewater, NJ 08807 jlaskey@norris-law.com

Counsel for Calpine Retail Holdings, LLC

Gregory L. Peterson, Esquire
Phillips Lytle LLP
201 West Third Street, Suite 205
Jamestown, NY 14701-4907
gpeterson@phillipslytle.com
Counsel for StateWise Energy Pennsylvania
LLC and SFE Energy Pennsylvania, Inc.

Gina L. Miller
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120
ginmiller@pa.gov

Aron J. Beatty
David T. Evrard
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
ABeatty@paoca.org
DEvrard@paoca.org

Steven C. Gray
Assistant Small Business Advocate
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

Kenneth L. Mickens, Esquire
316 Yorkshire Drive
Harrisburg, PA 17111
Kmickens11@verizon.net
Counsel for The Sustainable Energy Fund

John F. Lushis, Jr., Esquire Norris McLaughlin, P.A. 515 W. Hamilton Street, Suite 502 Allentown, PA 18101 jlushis@norris-law.com Counsel for Calpine Retail Holdings, LLC Kevin C. Blake, Esquire Phillips Lytle LLP 125 Main Street Buffalo, NY 14203 kblake@phillipslytle.com

Counsel for StateWise Energy Pennsylvania LLC and SFE Energy Pennsylvania, Inc.

Thomas F. Puchner, Esquire
Phillips Lytle LLP
Omni Plaza
30 South Pearl Street
Albany, NY 12207-1537
tpuchner@phillipslytle.com

Counsel for StateWise Energy Pennsylvania LLC and SFE Energy Pennsylvania, Inc.

Derrick Price Williamson, Esquire
Barry A. Naum, Esquire
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
Counsel for Industrial Energy Consumers of

Counsel for Industrial Energy Consumers of Pennsylvania Deanne M. O'Dell, Esquire
Kristine E. Marsilio, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
PO Box 1248
Harrisburg, PA 17101
dodell@eckertseamans.com
kmarsilio@eckertseamans.com
Counsel for Retail Energy Supply Association

Deanne M. O'Dell, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
PO Box 1248
Harrisburg, PA 17101
dodell@eckertseamans.com
Counsel for Inspire Energy Holdings, LLC

Lauren M. Burge, Esquire
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
Counsel for Inspire Energy Holdings, LLC

Pamela C. Polacek, Esquire
Adeolu B. Bakare, Esquire
Jo-Anne S. Thompson, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
ppolacek@mcneeslaw.com
abakare@mcneeslaw.com
jthompson@mcneeslaw.com
Counsel for PP&L Industrial Customer Alliance

Toda S. Stewart

DATED: July 27, 2020