



515 West Hamilton Street  
Suite 502  
Allentown, PA 18101  
T: 610-391-1800  
F: 610-391-1805

jlushis@norris-law.com

August 10, 2020

**E-FILE**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**RE: Petition of PECO Energy Company for Approval of Its Default Service Program for the Period From June 1, 2021 Through May 31, 2025; Docket No. P-2020-3019290**

Dear Secretary Chiavetta:

In accordance with 52 Pa. Code § 5.412a, please accept for filing the following pre-served written rebuttal testimony of Becky Merola on behalf of Calpine Retail Holdings, LLC, which was duly admitted into the record at the hearing held in the above-referenced proceeding on July 30, 2020, before Administrative Law Judge Eranda Vero.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document.

Thank you.

Sincerely,

NORRIS McLAUGHLIN, P.A.

*/s/ John F. Lushis, Jr.*

John F. Lushis, Jr.

c: Hon. Eranda Vero  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

### VIA E-MAIL

Honorable Eranda Vero  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120  
[evero@pa.gov](mailto:evero@pa.gov)

Kenneth M. Kulak, Esq.  
Anthony C. DeCusatis, Esq.  
Catherine G. Vasudevan, Esq.  
Brooke E. McGlinn, Esq.  
Morgan, Lewis and Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[anthony.decusatis@morganlewis.com](mailto:anthony.decusatis@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)

Erin Fure, Esq.  
Office of Small Business Advocate  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, Pennsylvania 17101  
[efure@pa.gov](mailto:efure@pa.gov)

W. Craig Williams, Esquire  
Anthony Gay, Esquire  
Jack Garfinkle, Esquire  
Exelon Business Services Company  
2301 Market Street, S23-1  
Philadelphia, PA 19101-8699  
[craig.williams@exeloncorp.com](mailto:craig.williams@exeloncorp.com)  
[anthony.gay@exeloncorp.com](mailto:anthony.gay@exeloncorp.com)  
[jack.garfinkle@exeloncorp.com](mailto:jack.garfinkle@exeloncorp.com)

Aron J. Beatty, Esq.  
David T. Evrard, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5th floor, Forum Place  
Harrisburg, PA 17101-1923  
[abeatty@paoca.org](mailto:abeatty@paoca.org)  
[devrard@paoca.org](mailto:devrard@paoca.org)

Richard Kanaskie, Esq.  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

Karen Moury, Esq.  
Eckert Seamans, LLC  
213 Market Street, 8th Floor  
Harrisburg, PA 17101  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)

Elizabeth R. Marx, Esq.  
PA Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[emarxpulp@palegalaid.net](mailto:emarxpulp@palegalaid.net)

Charis Mincavage, Esq.  
Adeolu A Bakare, Esq.  
Jo-Anne S. Thompson  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, Pennsylvania 17108  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[jthompson@mcneeslaw.com](mailto:jthompson@mcneeslaw.com)

Robert W. Ballenger, Esquire  
Josie B. H. Pickens, Esquire  
Joline R. Price, Esquire  
Kintéshia Scott, Esq.  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
[jpickens@clsphila.org](mailto:jpickens@clsphila.org)  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[kscott@clsphila.org](mailto:kscott@clsphila.org)

Logan Welde, Esq.  
Joseph Minott, Esq.  
Clean Air Council  
135 S. 19<sup>th</sup> Street, Suite 300  
Philadelphia, PA 19103  
[lwedle@cleanair.org](mailto:lwedle@cleanair.org)  
[joe\\_minott@cleanair.org](mailto:joe_minott@cleanair.org)

Devin McDougall, Esq.  
Rebecca Barker, Esq.  
Earth Justice  
476 Clinton Ave, Apt 6F  
Brooklyn, NY 11238  
[dmcDougall@earthjustice.org](mailto:dmcDougall@earthjustice.org)  
[rbarker@earthjustice.org](mailto:rbarker@earthjustice.org)

Gregory Peterson, Esq.  
Phillips Lytle, LLP  
201 West Third Street, Suite 205  
Jamestown, NY 14701  
[gpeterson@phillipslytle.com](mailto:gpeterson@phillipslytle.com)

Kevin Blake, Esq.  
Phillips Lytle, LLP  
125 Main Street  
Buffalo, NY 14203  
[kblake@phillipslytle.com](mailto:kblake@phillipslytle.com)

Thomas F. Puchner, Esq.  
Phillips Lytle, LLP  
Omni Plaza  
30 South Pearl Street  
Albany, NY 12207-1537  
[tpuchner@phillipslytle.com](mailto:tpuchner@phillipslytle.com)

James Laskey, Esq.  
Norris McLaughlin, P.A.  
400 Crossing Blvd, 8<sup>th</sup> Floor  
Bridgewater, NJ 08807  
[jlasky@norris-law.com](mailto:jlasky@norris-law.com)

/s/ John F. Lushis, Jr.

John F. Lushis, Jr.  
Counsel to Calpine Energy Solutions, LLC

Dated this 10<sup>th</sup> day of August, 2020, in Allentown, Pennsylvania.