

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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 /pennoca

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January 5, 2021

**Via Electronic Mail Only**

Devin T. Ryan, Esquire  
Post & Schell, P.C.  
17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601

Re: Joint Petition for Consolidation of Proceedings  
and Approval of the Phase IV Energy Efficiency  
and Conservation Plan of Metropolitan Edison  
Company, Pennsylvania Electric Company,  
Pennsylvania Power Company, and West Penn  
Power Company  
Docket Nos. M-2020-3020820  
M-2020-3020821  
M-2020-3020822  
M-2020-3020823

Dear Mr. Ryan:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set I, 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 five (5) 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:

Geoffrey Crandall  
MSB Energy Associates, Inc.  
6907 University Avenue #162  
Middleton, WI 53562  
E-Mail: [Crandall@msbnrg.com](mailto:Crandall@msbnrg.com)

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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/ Christy M. Appleby  
Christy M. Appleby  
Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
E-Mail: [CApplby@paoca.org](mailto:CApplby@paoca.org)

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service Only)  
Certificate of Service

\*301914

CERTIFICATE OF SERVICE

Re: Joint Petition for Consolidation of Proceedings : Docket Nos. M-2020-3020820  
and Approval of the Phase IV Energy Efficiency : M-2020-3020821  
and Conservation Plan of Metropolitan Edison : M-2020-3020822  
Company, Pennsylvania Electric Company, : M-2020-3020823  
Pennsylvania Power Company, and West Penn :  
Power Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power 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 January 2021.

**SERVICE BY E-MAIL ONLY**

Erin K. Fure, Esquire  
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555 Walnut Street  
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Philadelphia, PA 19103-2808

John L. Munsch, Esquire  
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118 Locust Street  
Harrisburg, PA 17101

Joseph L. Vullo, Esquire  
Community Action Association of PA  
1460 Wyoming Avenue  
Forty Fort, PA 18704

/s/ Christy M. Appleby  
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Dated: January 5, 2021  
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