



February 11, 2021

Via Electronic Filing

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 Act 129 Phase IV
Energy Efficiency and Conservation Plan / Docket No. M-2020-3020830**

Secretary Chiavetta:

Enclosed for filing please find the **Verifications of Alice Napoleon and Courtney Lane**, on behalf of the Natural Resources Defense Council, in the above-captioned proceeding

Copies will be circulated in accordance with the attached Certificate of Service.

Sincerely,

/s/ James M. Van Nostrand

James M. Van Nostrand

Keyes & Fox LLP

320 Fort Duquesne Blvd, Suite 15K

Pittsburgh, PA 15222

304- 777-6050

jvannostrand@keyesfox.com

Counsel to Natural Resources Defense Council

Enclosures

cc: Certificate of Service

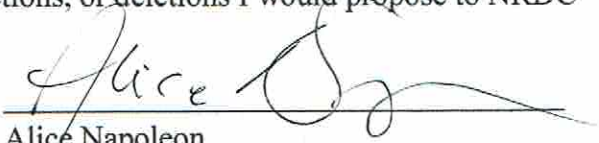
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :
Approval of its Act 129 Phase IV Energy : M-2020-3020830
Efficiency and Conservation Plan :
:

VERIFICATION OF ALICE NAPOLEON

I, **Alice Napoleon**, hereby state and verify the following:

1. I am a Senior Associate at Synapse Energy Economics, Inc.
2. I have submitted in this proceeding, through counsel, written direct testimony, NRDC Statement No. 1, Direct Testimony of Alice Napoleon and Courtney Lane, including NRDC Exhibits AN/CL-1, AN/CL-2, and AN/CL-3.
3. In lieu of my appearance at hearing in this matter, I am offering NRDC Statement No. 1 into evidence at hearing through the statements set forth in this verification.
4. If I were called to testify at hearing, the answers to the questions I gave in NRDC Statement No. 1 would be the answers given by me at hearing in response to those same questions.
5. The facts set forth in my answers contained in NRDC Statement No. 1 are true and correct and represent my answers to those questions.
6. There are no additions, corrections, or deletions I would propose to NRDC Statement No. 1.



Alice Napoleon

Date: February 8, 2021.

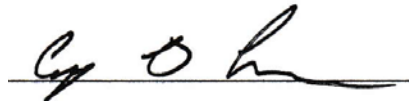
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :
Approval of its Act 129 Phase IV Energy : M-2020-3020830
Efficiency and Conservation Plan :
:

VERIFICATION OF COURTNEY LANE

I, **Courtney Lane**, hereby state and verify the following:

1. I am a Senior Associate at Synapse Energy Economics, Inc.
2. I have submitted in this proceeding, through counsel, written direct testimony, NRDC Statement No. 1, Direct Testimony of Alice Napoleon and Courtney Lane, including NRDC Exhibits AN/CL-1, AN/CL-2, and AN/CL-3.
3. In lieu of my appearance at hearing in this matter, I am offering NRDC Statement No. 1 into evidence at hearing through the statements set forth in this verification.
4. If I were called to testify at hearing, the answers to the questions I gave in NRDC Statement No. 1 would be the answers given by me at hearing in response to those same questions.
5. The facts set forth in my answers contained in NRDC Statement No. 1 are true and correct and represent my answers to those questions.
6. There are no additions, corrections, or deletions I would propose to NRDC Statement No. 1.



Courtney Lane

Date: February 8, 2021.

CERTIFICATE OF SERVICE

Petition of PECO Energy Company for :
Approval of its Act 129 Phase IV Energy : Docket No. M-2020-3020830
Efficiency and Conservation Plan :

I hereby certify that this day I served a copy of NRDC Witness Verifications in accordance with the requirements of 52 Pa. Code § 1.54 and consistent with the Commission's March 20 Emergency Order at Docket M-2020-3019262.

Via Electronic Mail

Hon. Mark A. Hoyer
Deputy Chief Administrative Law Judge
Hon. Emily DeVoe
Administrative Law Judge
400 North Street
Harrisburg, PA 17120
mhoyer@pa.gov
edevoe@pa.gov

Anthony Gay, Esq.
Jack R. Garfinkle, Esq.
PECO Energy Company
2301 Market Street
PO Box 8699
Philadelphia, PA 19103
Anthony.Gay@exeloncorp.com
Jack.Garfinkle@exeloncorp.com

Laura J. Antinucci, Esq.
Aron J. Beatty, Esq.
Acting Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101
lantinucci@paoca.org
abeatty@paoca.org

Kenneth M. Kulak, Esq.
Catherine G. Vasudevan, Esq.
Morgan, Lewis & Bockius, LLP
1701 Market Street
Philadelphia, PA 19103-2921
ken.kulak@morganlewis.com
catherine.vasudevan@morganlewis.com

Representing PECO Energy Company

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

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

Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Ria Pereira, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
emarxpulp@palegalaid.net
jsweetpulp@palegalaid.net
rpereirapulp@palegalaid.net
pulp@palegalaid.net

Representing CAUSE-PA

Derrick Price Williamson, Esq.
Barry A. Naum, Esq.
Spilman Thomas & Battle PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

Representing IECP

Date: February 11, 2021

Kinteshia S. Scott, Esq.
Joline Price, Esq.
Robert W. Ballenger, Esq.
Jose B.H. Pickens, Esq.
Community Legal Services
1424 Chesnut Street
Philadelphia, PA 19102
kscott@clsphila.org
jpickens@clsphila.org
jprice@clsphila.org
rballenger@clsphila.org

Representing TURN

Adeolu A. Bakare, Esq.
Jo-Anne Thompson, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA
abakare@mwn.com
jthompson@mcneeslaw.com

Representing PAIEUG

/s/ Blake Elder
Blake Elder