COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE 555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560



FAX (717) 783-7152 consumer@paoca.org

January 13, 2022

Via Electronic Mail Only

Kenneth M. Kulak, Esquire Catherine G. Vasudevan, Esquire Brooke E. McGlinn, Esquire Morgan, Lewis & Bockius LLP 1701 Market Street Philadelphia, PA 19103-2921

> Re: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Default Service Programs for the Period June 1, 2023 through May 31, 2027 Docket Nos. P-2021-3030012 P-2021-3030013 P-2021-3030014 P-2021-3030021

Dear Counsel:

Enclosed you will find two copies of 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 twenty (20) 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:

Barbara R. Alexander Barbara Alexander Consulting, LLC 83 Wedgewood Drive Winthrop, Maine 04364 E-Mail: <u>barbalexand@gmail.com</u> Kenneth M. Kulak, Esquire Catherine G. Vasudevan, Esquire Brooke E. McGlinn, Esquire January 13, 2022 Page 2

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,

<u>/s/ Harrison W. Breitman</u> Harrison W. Breitman Assistant Consumer Advocate PA Attorney I.D. # 320580 E-Mail: <u>HBreitman@paoca.org</u>

Enclosures:

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

*322340

CERTIFICATE OF SERVICE

Re:	Joint Petition of Metropolitan Edison Company,	:	
	Pennsylvania Electric Company, Pennsylvania	:	
	Power Company, and West Penn Power Company	:	
	for Approval of Default Service Programs for the	:	
	Period June 1, 2023 through May 31, 2027	:	

Docket Nos. P-2021-3030012 P-2021-3030013 P-2021-3030014 P-2021-3030021

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

("FirstEnergy Companies"), 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 13th day of January 2022.

SERVICE BY E-MAIL ONLY

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

Tori L. Giesler, Esquire Darshana Singh, Esquire First Energy Service Company 2800 Pottsville Pike P.O. Box 16001 Reading, PA 19612-6001 tgiesler@firstenergycorp.com singhd@firstenergycorp.com

Elizabeth R. Marx, Esquire Lauren N. Berman, Esquire Ria M. Pereira, Esquire John W. Sweet, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 pulp@pautilitylawproject.org Teresa Wagner Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101-1923 tereswagne@pa.gov

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Darryl A. Lawrence Senior Assistant Consumer Advocate PA Attorney I.D. # 93682 E-Mail: <u>DLawrence@paoca.org</u> Christy M. Appleby Assistant Consumer Advocate PA Attorney I.D. # 85824 E-Mail: <u>CAppleby@paoca.org</u>

Counsel for: Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 Phone: (717) 783-5048 Fax: (717) 783-7152 Dated: January 13, 2022 *322342