


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

 @pa\_oca

 /pennoca

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

February 22, 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 V, 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 ten (10) 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: [OCAFEDSP2021@paoca.org](mailto:OCAFEDSP2021@paoca.org)

Kenneth M. Kulak, Esquire  
Catherine G. Vasudevan, Esquire  
Brooke E. McGlinn, Esquire  
February 22, 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,

/s/ Harrison W. Breitman  
Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
E-Mail: [HBreitman@paoca.org](mailto:HBreitman@paoca.org)

Enclosures:

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

\*323866

CERTIFICATE OF SERVICE

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

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 V, 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 22<sup>nd</sup> day of February 2022.

**SERVICE BY E-MAIL ONLY**

Allison C. Kaster, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Erin K. Fure, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[efure@pa.gov](mailto:efure@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](mailto:tgiesler@firstenergycorp.com)  
[singhd@firstenergycorp.com](mailto:singhd@firstenergycorp.com)

Kenneth M. Kulak, Esquire  
Catherine G. Vasudevan, Esquire  
Brooke E. McGlinn, Esquire  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.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](mailto:pulp@pautilitylawproject.org)

A. Michael Gianantonio, Esquire  
Robert F. Daley, Esquire  
Robert Peirce & Associates, P.C.  
707 Grant Street  
Gulf Tower, Ste. 125  
Pittsburgh, PA 15219  
[mgianantonio@peircelaw.com](mailto:mgianantonio@peircelaw.com)  
[rdaley@peircelaw.com](mailto:rdaley@peircelaw.com)  
*Counsel for John Bevec & Sunrise Energy, LLC*

**SERVICE BY E-MAIL ONLY (continued)**

Thomas J. Sniscak, Esquire  
Whitney E. Snyder, Esquire  
Phillip D. Demanchick Jr., Esquire  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)  
[pddemanchick@hmslegal.com](mailto:pddemanchick@hmslegal.com)  
*Counsel for The PA State University*

Kenneth Schisler, VP, Regulatory Affairs  
Chandra Colaresi, Spec., Regulatory Affairs  
CPower Energy Management  
1001 Fleet Street  
Suite 400  
Baltimore, MD 2120  
[Kenneth.Schisler@CPowerEnergyManagement.com](mailto:Kenneth.Schisler@CPowerEnergyManagement.com)  
[Chandra.Colaresi@CPowerEnergyManagement.com](mailto:Chandra.Colaresi@CPowerEnergyManagement.com)  
*Counsel for CPower*

Colleen Kartychak, Esquire  
John M. White, Esquire  
Exelon Corporation  
1310 Point Street  
Baltimore, MD 21231  
[colleen.kartychak@exeloncorp.com](mailto:colleen.kartychak@exeloncorp.com)  
[john.white@exeloncorp.com](mailto:john.white@exeloncorp.com)  
*Counsel for Exelon Generation Co., LLC  
& Constellation NewEnergy, Inc.*

John F. Lushis, Jr., Esquire  
David Berger, Esquire  
James H. Laskey, Esquire  
Norris McLaughlin, P.A.  
515 W. Hamilton Street, Suite 502  
Allentown, PA 1810  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)  
[dberger@norris-law.com](mailto:dberger@norris-law.com)  
[jlasky@norris-law.com](mailto:jlasky@norris-law.com)  
*Counsel for Calpine Retail Holdings, LLC*

Susan E. Bruce, Esquire  
Charis Mincavage, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108  
[sbruce@mcneeslaw.com](mailto:sbruce@mcneeslaw.com)  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
*Counsel for MEIUG, PICA, and WPPH*

Todd S. Stewart, Esquire  
Hawke McKeon & Sniscak, LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
*Counsel for Shipley Choice, LLC d/b/a  
Shipley Energy*

Deanne M. O'Dell, Esquire  
Karen O. Moury, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
P.O. Box 1248  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
*Counsel for RESA and NRG*

Michael A. Gruin, Esquire  
Stevens & Lee  
17 North 2<sup>nd</sup> Street  
16<sup>th</sup> Floor  
Harrisburg, PA 17101  
[michael.gruin@stevenslee.com](mailto:michael.gruin@stevenslee.com)  
*Counsel for Enerwise Global Technologies,  
LLC d/b/a CPower Energy Management*

**SERVICE BY E-MAIL ONLY (continued)**

Brian R. Greene, Esquire  
GREENEHURLOCKER, PLC  
4908 Monument Avenue  
Suite 200  
Richmond, Virginia 23230  
[BGreene@GreeneHurlocker.com](mailto:BGreene@GreeneHurlocker.com)  
*Counsel for Enerwise Global Technologies,  
LLC d/b/a CPower Energy Management*

/s/ Harrison W. Breitman  
Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
E-Mail: [HBreitman@paoca.org](mailto:HBreitman@paoca.org)

Darryl A. Lawrence  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 93682  
E-Mail: [DLawrence@paoca.org](mailto:DLawrence@paoca.org)

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

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: February 22, 2022  
\*323868