

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

March 25, 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 X, 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:

Serhan Ogur
Exeter Associates, Inc.
10480 Little Patuxent Parkway
Suite 300
Columbia, Maryland 21044
E-Mail: OCAFEDSP2021@paoca.org

Kenneth M. Kulak, Esquire
Catherine G. Vasudevan, Esquire
Brooke E. McGlinn, Esquire
March 25, 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/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CApplby@paoca.org

Enclosures:

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

*326082

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 X, 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 25th day of March 2022.

SERVICE BY E-MAIL ONLY

Allison C. Kaster, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
akaster@pa.gov

Erin K. Fure, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
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
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
catherine.vasudevan@morganlewis.com
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

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
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
wesnyder@hmslegal.com
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
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
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
dberger@norris-law.com
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
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
*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, 8th Floor
P.O. Box 1248
Harrisburg, PA 17101
dodell@eckertseamans.com
kmoury@eckertseamans.com
Counsel for RESA and NRG Energy, Inc.

Michael A. Gruin, Esquire
Stevens & Lee
17 North 2nd Street
16th Floor
Harrisburg, PA 17101
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
*Counsel for Enerwise Global Technologies,
LLC d/b/a CPower Energy Management*

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CApplby@paoca.org

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

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

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: March 25, 2022
*326081