



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

April 7, 2022

**Via Electronic Mail**

Administrative Law Judge Jeffrey A. Watson  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
Piatt Place  
301 Fifth Avenue, Suite 220  
Pittsburgh, PA 15222  
[jeffwatson@pa.gov](mailto:jeffwatson@pa.gov)

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  
and P-2021-3030021

**I&E Surrebuttal Testimony**

Your Honor:

Enclosed please find the following Surrebuttal Testimony of the Bureau of Investigation and Enforcement's (I&E) witness:

**Christopher Keller**

**I&E Statement No. 1-SR**

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Allison C. Kaster  
Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 93176  
(717) 783-7998  
[akaster@pa.gov](mailto:akaster@pa.gov)

ACK/jfm  
Enclosures

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only – via e-file*)  
Nick Miskanic, Legal Assistant, OALJ (*via e-mail*)  
Per Certificate of Service (*Cover Letter & Certificate of Service via e-mail*)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Surrebuttal Testimony** dated April 7, 2022, in the manner and upon the person listed below.

**Served via Electronic Mail Only**

Hon. Jeffrey A. Watson  
Nick Miskanic, Legal Assistant  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
Piatt Place  
301 Fifth Avenue, Suite 220  
Pittsburgh, PA 15222  
[jeffwatson@pa.gov](mailto:jeffwatson@pa.gov)  
[nmiskanic@pa.gov](mailto:nmiskanic@pa.gov)  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge

Darshana Singh, Esq.  
Tori L. Giesler, Esq.  
FirstEnergy Service Company  
2800 Pottsville Pike  
Reading, PA 19612-6001  
[singhd@firstenergycorp.com](mailto:singhd@firstenergycorp.com)  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

Kenneth M. Kulak, Esq.  
Catherine G. Vasudevan, Esq.  
Brooke E. McGlinn, Esq.  
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)  
*Counsel for*  
*Metropolitan Edison Company,*  
*Pennsylvania Electric Company,*  
*Pennsylvania Power Company,*  
*and West Penn Power Company*

Elizabeth R. Marx, Esq.  
Ria Pereira, Esq.  
Lauren Berman, Esq.  
John Sweet, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
*Counsel for CAUSE-PA*

Susan E. Bruce, Esq.  
Charis Mincavage, Esq.  
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  
Med-Ed Industrial Users Group,  
the Penelec Industrial Customer Alliance,  
and the West Penn Power Industrial  
Intervenors*

Todd Stewart, Esq.  
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*

Colleen Kartychak, Esq.  
Exelon Corporation  
1310 Point Street  
Baltimore, MD 21231  
[colleen.kartychak@exeloncorp.com](mailto:colleen.kartychak@exeloncorp.com)  
*Counsel for  
Exelon Generation Company, LLC and  
Constellation NewEnergy, Inc.*

Thomas J. Sniscak, Esq.  
Whitney E. Snyder, Esq.  
Phillip D. Demanchick, Jr., Esq.  
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 Penn State University*

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

John F. Lushis, Jr., Esq.  
David Berger, Esq.  
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)  
*Counsel for Calpine Retail Holdings, LLC*

James Laskey, Esq.  
Norris McLaughlin, P.A.  
400 Crossing Blvd., 8th Floor  
Bridgewater, NJ 08807  
[ilaskey@norris-law.com](mailto:ilaskey@norris-law.com)  
*Counsel for Calpine Retail Holdings, LLC*

Deanne M. O'Dell, Esq.  
Karen O. Moury, Esq.  
Eckert Seamans Cherin & Mellot LLC  
213 Market Street, 8th Floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
*Counsel for Retail Energy Supply  
Association and NRG Energy, Inc.*

Christopher O'Hara, Esq.  
PJM Interconnection LLC  
2750 Monroe Blvd.  
Audubon, PA 19403  
[christopher.ohara@pjm.com](mailto:christopher.ohara@pjm.com)

John M. White, Esq.  
Exelon Corporation  
101 Constitution Avenue NW  
Washington DC, 20001  
[john.white@exeloncorp.com](mailto:john.white@exeloncorp.com)  
*Counsel for*  
*Exelon Generation Company, LLC and*  
*Constellation NewEnergy, Inc.*

Kenneth Schisler, VP  
Chandra Colareise, Specialist  
Regulatory Affairs  
Cpower Energy Management  
1001 Fleet Street  
Baltimore, MD 2021  
[kenneth.schisler@cpowerenergymanagement.com](mailto:kenneth.schisler@cpowerenergymanagement.com)  
[chandra.colaresi@cpowerenergymanagement.com](mailto:chandra.colaresi@cpowerenergymanagement.com)

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

Darryl A. Lawrence, Esq.  
Christy M. Appleby, Esq.  
Harrison W. Breitman, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor Forum Place  
Harrisburg, PA 17101-1923  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[hbreitman@paoca.org](mailto:hbreitman@paoca.org)

Erin K. Fure, Esq.  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor Forum Place  
Harrisburg, PA 17101-1923  
[efure@pa.gov](mailto:efure@pa.gov)



---

Allison C. Kaster  
Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 93176