



March 18, 2024

**Via E-File**

David McGregor, Esq.  
Michael W. Hassell, Esq.  
Megan Rulli, Esq.  
Post & Schell, P.C.  
17 North Second Street,  
12th Floor Harrisburg, PA 17101  
[mhassell@postschell.com](mailto:mhassell@postschell.com)  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)  
[mrulli@postschell.com](mailto:mrulli@postschell.com)

Kimberly A. Klock, Esq.  
Michael J. Shafer, Esq.  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
[kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2025 through May 31, 2029, Docket P-2024-3047290

Dear Counsel,

Please find the **Set I Interrogatories and Requests for Documents of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** directed to PPL Electric Utilities Corporation in the above referenced matter.

Respectfully submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*

A handwritten signature in blue ink that reads "Elizabeth R. Marx".

---

Elizabeth R. Marx, Esq.  
267-240-3089

[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)

CC: Rosemary Chiavetta, Secretary (Letter and Cert. of Service only)

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for :  
Approval of a Default Service Program for the : Docket No. P-2024-3047290  
Period of June 1, 2025 through May 31, 2029 :

**CERTIFICATE OF SERVICE**

I hereby certify I have on this day served copies of the **Interrogatories and Requests for Documents of CAUSE-PA, Set I** to PPL Electric Utilities Corporation in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Kimberly A. Klock, Esq. Michael J. Shafer, Esq. PPL Services Corporation Two North Ninth Street Allentown, PA 18101 <a href="mailto:kklock@pplweb.com">kklock@pplweb.com</a> <a href="mailto:mjshafer@pplweb.com">mjshafer@pplweb.com</a>	David McGregor, Esq. Michael W. Hassell, Esq. Megan Rulli, Esq. Post & Schell, P.C. 17 North Second Street, 12th Floor Harrisburg, PA 17101 <a href="mailto:mhassell@postschell.com">mhassell@postschell.com</a> <a href="mailto:dmacgregor@postschell.com">dmacgregor@postschell.com</a> <a href="mailto:mrulli@postschell.com">mrulli@postschell.com</a>
Christy Appleby, Esq. Office of Consumer Advocate 555 Walnut Street 5 <sup>th</sup> floor, Forum Place Harrisburg, PA 17101-1923 <a href="mailto:cappleby@paoca.org">cappleby@paoca.org</a>	Steven C. Gray, Esq. Small Business Advocate Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, Pennsylvania 1710 <a href="mailto:sgray@pa.gov">sgray@pa.gov</a>
Allison Kaster, Esquire Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission PO Box 3265 Harrisburg PA 17105-3265 <a href="mailto:akaster@pa.gov">akaster@pa.gov</a>	Adeolu A Bakare, Esq. Jo-Anne S. Thompson, Esq. McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, Pennsylvania 17108 <a href="mailto:jthompson@mcneeslaw.com">jthompson@mcneeslaw.com</a> <a href="mailto:abakare@mwn.com">abakare@mwn.com</a>
Deanne M. O'Dell, Esq. Lauren M. Burge, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8 <sup>th</sup> Fl. Harrisburg, PA 17101 <a href="mailto:dodell@eckertseamans.com">dodell@eckertseamans.com</a> <a href="mailto:lburge@eckertseamans.com">lburge@eckertseamans.com</a>	John F. Lushis, Jr., Esq. Norris McLaughlin, PA 515 West Hamilton St. Suite 502 Allentown, PA 18101 <a href="mailto:jlushis@norris-law.com">jlushis@norris-law.com</a>
Todd S. Stewart, Esq. Hawke McKeon & Sniscak LLP 100 N. 10 <sup>th</sup> Street Harrisburg PA 17101 <a href="mailto:tsstewart@hmslegal.com">tsstewart@hmslegal.com</a>	Gregory L. Peterson, Esq. Thomas F. Puchner, Esq. Kevin C. Blake, Esq. Phillips Lytle LLP 201 W. Third Street, Suite 205 Jamestown, NY 14701-4907 <a href="mailto:gpeterson@phillipslytle.com">gpeterson@phillipslytle.com</a>

Derrick Price Williamson, Esq. Barry A. Naum, Esq. Spilman Thomas & Battle 1100 Bent Creek Boulevard, Suite 101 Mechanicsburg, PA 17050 <a href="mailto:dwilliamson@spilmanlaw.com">dwilliamson@spilmanlaw.com</a> <a href="mailto:bnaum@spilmanlaw.com">bnaum@spilmanlaw.com</a>	
---	--

Respectfully submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



---

Elizabeth R. Marx, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street, Harrisburg, PA 17101  
267-240-3089 (direct)  
[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)

March 18, 2024