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
www.oca.pa.gov

May 10, 2024

Via Electronic Mail Only

PATRICK M. CICERO

Consumer Advocate

Brooke E McGlinn, Esquire Kenneth M. Kulak, Esquire Maggie Curran, Esquire Morgan, Lewis & Bockius LLP 2222 Market Street Philadelphia, PA 19103-3007 brooke.mcglinn@morganlewis.com ken.kulak@morganlewis.com maggie.curran@morganlewis.com

> Re: Petition of PECO Energy Company for Approval of its Default Service Program for the Period of June 1, 2025, through May 31, 2029 Docket No. P-2024-3046008

Dear Counsel:

Enclosed please find the following documents: the Office of Consumer Advocate's Response to PECO Interrogatories to OCA, Set II. If you have questions, please contact the Office of Consumer Advocate.

Copies of the responses have been served as indicated on the enclosed Certificate of Service.

Sincerely.

/s/<u>Barrett C. Sheridan</u> Barrett C. Sheridan Assistant Consumer Advocate

PA Attorney I.D. # 61138 BSheridan@paoca.org

Enclosures:

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

CERTIFICATE OF SERVICE

Petition of PECO Energy Company for:Approval of its Default Service Program for:the Period of June 1, 2025, through May 31,:2029:

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's Response to PECO Set II, 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 10th day of May 2024 SERVICE BY E-MAIL ONLY

Brooke E McGlinn, Esquire Kenneth M. Kulak, Esquire Maggie Curran, Esquire Morgan, Lewis & Bockius LLP 2222 Market Street Philadelphia, PA 19103-3007 brooke.mcglinn@morganlewis.com ken.kulak@morganlewis.com maggie.curran@morganlewis.com *Counsel for PECO Energy Company*

Jack Garfinkle, Esquire Exelon 2301 Market St. Legal Department S23-1 Philadelphia, PA 19103 Jack.garfinkle@exeloncorp.com Brandon J. Pierce, Esquire Adesola K. Adegbesan, Esquire PECO Energy Company 2301 Market Street, S23-1 Philadelphia, PA 19103 Brandon.Pierce@exeloncorp.com adesola.adegbesan@exeloncorp.com *Counsel for PECO Energy Company*

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

SERVICE BY E-MAIL ONLY

Steven C. Gray, Esquire Rebecca Lyttle, Esquire Office of Small Business Advocate Forum Place 555 Walnut Street, 1st Floor Harrisburg, Pennsylvania 17101 sgray@pa.gov relyttle@pa.gov *Counsel for OSBA*

Zachary M. Fabish Senior Attorney Sierra Club 50 F Street, NW, 8th Floor Washington, D.C. 20001 zachary.fabish@sierraclub.org *Counsel for Energy Justice Advocates*

Logan Welde Senior Staff Attorney Clean Air Council 1617 John F. Kennedy Boulevard, Suite 1130 Philadelphia, PA 19103 Iwelde@cleanair.org *Counsel for Energy Justice Advocates* Adeolu A Bakare, Esquire Charis Mincavage, Esquire McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 abakare@mcneeslaw.com cmincavage@mcneeslaw.com *Counsel for PAIEUG*

Daniela Rakhlina-Powsner, Esquire Robert W. Ballenger, Esquire Joline R. Price, Esquire Vikram A. Patel, Esquire Community Legal Services, Inc. 1424 Chestnut Street Philadelphia, PA 19102 drakhlinapowsner@clsphila.org rballenger@clsphila.org jprice@clsphila.org vpatel@clsphila.org *Counsel for TURN and CAUSE-PA*

Thomas F. Puchner, Esquire Phillips Lytle LLP 30 South Pearl Street Albany, NY 12207-1537 tpuchner@phillipslytle.com

SERVICE BY E-MAIL ONLY

Devin McDougall, Esquire Clean Energy Program Earthjustice 1617 John F. Kennedy Blvd., Suite 2020 Philadelphia, PA 19103 dmcdougall@earthjustice.org cweinberg@earthjustice.org mdegasperi@earthjustice.org *Counsel for Energy Justice Advocates*

Karen O. Moury, Esquire Deanne M. O'Dell, Esquire Lauren M. Burge, Esquire Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8th Floor Harrisburg, PA 17101 kmoury@eckertseamans.com dodell@eckertseamans.com lburge@eckertseamans.com *Counsel for NRG and RESA*

Elizabeth J. Sher, Esquire Day Pitney LLP One Jefferson Road Parsippany, NJ 07054-2891 esher@daypitney.com *Counsel for Constellation NewEnergy Inc. and Constellation Energy Generation, LLC*

Alexander Judd Day Pitney LLP 225 Asylum Street Hartford, CT 06103 ajudd@daypitney.com Counsel for Constellation NewEnergy, Inc. and Constellation Energy Generation, LLC

John F. Lushis, Jr., Esquire Norris McLaughlin, P.A. 515 West Hamilton Street - Suite 502 Allentown, PA 18101 jlushis@norris-law.com Counsel for Cal Elizabeth R. Marx, Esquire John Sweet, Esquire Ria Pereira, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 emarx@pautilitylawproject.org jsweet@pautilitylawproject.org rpereira@pautilitylawproject.org Counsel for PULP

Sophia Browning* Day Pitney LLP 555 11th Street NW Washington, DC 20004 sbrowning@daypitney.com Counsel for Constellation NewEnergy, Inc. and Constellation Energy Generation, LLC

Gregory L. Peterson, Esquire Phillips Lytle LLP 201 West Third Street, Suite 205 Jamestown, NY 14701-4907 gpeterson@phillipslytle.com

SERVICE BY E-MAIL ONLY

Yena Lee Assistant General Counsel 1310 Point Street Baltimore, MD 21231 yena.lee@constellation.com Counsel for Constellation NewEnergy, Inc. and Constellation Energy Generation, LLC

> <u>/s/Barrett C. Sheridan</u> Barrett C. Sheridan Assistant Consumer Advocate PA Attorney I.D. # 61138 BSheridan@paoca.org

> Andrew J. Zerby Assistant Consumer Advocate AZerby@paoca.org

> *Counsel for:* Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 717-783-5048

Dated: May 10, 2024