

Morgan Lewis

Kenneth M. Kulak

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

April 17, 2024

VIA eFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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

Dear Secretary Chiavetta:

Enclosed for filing in the above-captioned proceeding, is the **Certificate of Service** evidencing service of **PECO Energy Company's Responses to the Interrogatories of the Energy Justice Advocates, Set V, Question Nos. 2-3 and 5-10.**

As indicated on the enclosed Certificate of Service, copies have been served upon all parties of record.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Kenneth M. Kulak

KMK/tp
Enclosure

c: Per Certificate of Service (w/encls.)

Morgan, Lewis & Bockius LLP

2222 Market Street
Philadelphia, PA 19103-3007
United States

+1.215.963.5000
+1.215.963.5001

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY
COMPANY FOR APPROVAL OF ITS
DEFAULT SERVICE PROGRAM FOR
THE PERIOD FROM JUNE 1, 2025
THROUGH MAY 31, 2029** : : : : **Docket No. P-2024-3046008**

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the foregoing documents on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

Barrett C. Sheridan
Andrew J. Zerby
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Philadelphia, PA 17101-1923
OCA2024PECODSP@paoca.org
*Counsel for Office of Consumer
Advocate (OCA)*

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

Charis Mincavage
Adeolu A. Bakare
McNees, Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17108-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
lcharleton@mcneeslaw.com
*Counsel for Philadelphia Area
Industrial Energy Users Group*

John F. Lushis, Jr.
Norris McLaughlin, P.A.
515 W. Hamilton Street, Suite 502
Allentown, PA 18101
jlushis@norris-law.com
*Counsel for Calpine Retail Holdings, LLC
(Calpine)*

Lauren M. Burge
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
*Counsel for Retail Energy Supply
Association and NRG Energy, Inc.*

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

Daniela Rakhlina-Powsner
Robert W. Ballenger
Joline R. Price
Vikram A. Patel
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
drakhlinapowsner@clsphila.org
rballenger@clsphila.org
jprice@clsphila.org
vpatel@clsphila.org
*Counsel for Tenant Union Representative
Network (TURN) and Coalition for
Affordable Utility Services and Energy
Efficiency in Pennsylvania (CAUSE-PA)*

Logan Welde
Senior Staff Attorney
Clean Air Council
1617 John F. Kennedy Boulevard, Suite 1130
Philadelphia, PA 19103
lwelde@cleanair.org
Counsel for Energy Justice Advocates

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

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

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

Devin McDougall
Clean Energy Program
Earthjustice
1617 John F. Kennedy Boulevard, Suite 2020
Philadelphia, PA 19103
dmcDougall@earthjustice.org
cweinberg@earthjustice.org
mdegasperi@earthjustice.org
Counsel for Earth Justice Advocates

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

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*

CONSULTANTS

Serhan Ogur
Exeter Associates, Inc.
10480 Little Patuxent Parkway, Suite 300
Columbia, MD 21044
OCA2024PECODSP@paoca.org
Consultant for OCA


Mr. Mark D. Ewen
Industrial Economics, Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
mewen@indecon.com
Consultant for OSBA

Karl R. Rábago
Rábago Energy
1350 Gaylord Street
Denver, CO 80206
karl@rabagoenergy.com
Consultant for Energy Justice Advocates

Barbara R Alexander
Barbara Alexander Consulting, LLC
44 Beech Street
Hallowell, ME 04347
OCA2024PECODSP@paoca.org
Consultant for OCA

Elizabeth Marx
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
emarx@pautilitylawproject.org
Consultant for TURN and CAUSE-PA

Becky Merola
Director of Government & Regulatory Affairs
Calpine Retail Holdings, LLC
becky.merola@calpinesolutions.com
Consultant for Calpine



Kenneth M. Kulak (Pa. No. 75509)
Brooke E. McGlinn (Pa. No.
204918) Maggie E. Curran (Pa. No.
330545) Morgan, Lewis & Bockius
LLP 2222 Market Street
Philadelphia, PA 19103-3007
215.963.5384 (bus)
215.963.5001 (fax)
ken.kulak@morganlewis.com
brooke.mcglinn@morganlewis.com
maggie.curran@morganlewis.com

Dated: April 17, 2024

Counsel for PECO Energy Company