

515 West Hamilton Street Suite 502 Allentown, PA 18101 T: 610-391-1800 F: 610-391-1805

jlushis@norris-law.com

April 19, 2024

E-FILE

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor Harrisburg, PA 17120

RE: Petition of PECO Energy Company for Approval of Its Default Service

Plan 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 Calpine Retail Holdings, LLC's (Calpine) response to the Interrogatory of PECO Energy Company, First Set.

The parties shown on the attached Certificate of Service are being duly served with a copy of Calpine's response to the Interrogatory of PECO Energy Company, First Set by e-mail.

If you have any questions, please contact me.

Thank you.

Sincerely,

NORRIS McLAUGHLIN, P.A.

/s/John F. Lushis, Jr.

John F. Lushis, Jr.

cc: Administrative Law Judge Eranda Vero (via e-mail) Administrative Law Judge Arlene Ashton (via e-mail) Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA E-MAIL

Barrett C. Sheridan Andrew J. Zerby Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Philadelphia, PA 17101 bsheridan@paoca.org azerby@paoca.org OCA2024PECODSP@pa.org

Charis Mincavage Esquire
Adeolu A Bakare Esquire
McNees Wallace & Nurick
100 Pine Street
PO Box 1166
Harrisburg, PA 17108
cmincavage@mwn.com
abakare@mcneeslaw.com
lcharleton@mcneeslaw.com

Lauren M. Burge Eckert Seamans Cherin & Mellott, LLC 600 Grant Street, 44th Floor Pittsburgh, PA 15219 lburge@eckertseamans.com Steven C. Gray, Esquire
Rebecca Lyttle, Esquire
Office Of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg Pa 17101
sgray@pa.gov
relyttle@pa.gov

Daniela Rakhlina-Powsner
Robert W. Ballenger
Joline R. Price
Vikram A. Patel
Community Legal Services of Philadelphia
1424 Chestnut Street
Philadelphia, PA 19102
drakhlinapowsner@clsphila.org
rballenger@clsphila.org
jprice@clsphila.org
vpatel@clsphila.org

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

Kenneth M. Kulak Brook E. McGlinn Maggie E. Curran Morgan Lewis & Bockius LLP 1701 Market Street Philadelphia PA 19103-2921 ken.kulak@morganlewis.com brooke.mcglinn@morganlewis.com maggie.curran@morganlewis.com

Devin McDougall Clean Energy Program Philadelphia Office 1617 John F. Kennedy Blvd., Suite 2020 Philadelphia, PA 19103 dmcdougall@earthjustice.org cweinberg@earthjustice.org mdegasperi@earthjustice.org

Logan Welde Senior Staff Attorney Clean Air Council 1617 John F. Kennedy Boulevard, Suite 1130 Baltimore, MD 21231 Philadelphia, PA 19103 lwelde@cleanair.org

Yenna Lee Assistant General Counsel 1310 Point Street yenna.lee@constellation.com

Elizabeth J. Sher Day Pitney LLP One Jefferson Road Parsippany, NJ 07054-2891 esher@daypitney.com

Alexander Judd Day Pitney LLP 225 Asylum Street Hartford, CT 06103 ajudd@daypitney.com

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

Sophia Browning Day Pitney LLP 555 11th Street NW Washington, DC 20004 sbrowning@daypitney.com

/s/ John F. Lushis, Ir.

John F. Lushis, Jr. Counsel to Calpine Retail Holdings, LLC

Dated this 19th day of April 2024 in Allentown, Pennsylvania

Pennsylvania Public Utility Commission

v.

PECO Energy Company

Petition of PECO Energy Company for Approval of Default Service Program

Docket No. P-2024-3046008

Response of Calpine Retail Holdings, LLC
To Interrogatories of the
PECO Energy Company

Calpine Retail Holdings, LLC Set I

Response Date: April 19, 2024

PECO-CALPINE-I-1.

Provide the workpapers associated with, and underlying, any direct testimony and any accompanying tables, schedules and exhibits. If any such workpapers or the tables, schedules and exhibits accompanying the direct testimony are in electronic format, such as Excel, please also provide such workpapers, tables, schedules and exhibits in live, native format with all formulas intact.

RESPONSE:

1. Calpine Retail Holdings, LLC (Calpine) does not expect to file direct testimony. Depending on the issues raised in direct testimony by other parties, Calpine reserves the right to call Becky Merola, a Calpine Director of Government & Regulatory Affairs, as a rebuttal witness. Calpine reserves the right to offer additional witnesses as necessitated by the issues. If Calpine decides to call any witnesses, Calpine will respond accordingly to any further interrogatories submitted by PECO Energy Company to Calpine.