

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560 (in PA only)

FAX (717) 783-7152  
consumer@paoca.org

IRWINA. POPOWSKY  
Consumer Advocate

December 29, 2011

Thomas P. Gadsden, Esquire  
Morgan Lewis & Bockius, LLP  
1701 Market Street  
Philadelphia, PA 19103-2921

RE: Joint Petition of Metropolitan Edison  
Company, Pennsylvania Electric Company,  
Pennsylvania Power Company and West  
Penn Power Company for Approval of Their  
Default Service Programs  
Docket Nos. P-2011-2273650; P-2011-  
2273668, P-2011-2273669, P-2011-2273670

Dear Mr. Gadsden:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set III, in the above-referenced proceeding.

We request that the Company provide verified answers to these inquiries within ten (10) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Matthew I. Kahal  
Exeter Associates  
10480 Little Patuxent Parkway  
Suite 300  
Columbia, MD 21044  
410-992-7500  
E-Mail: [mkahal@exeterassociates.com](mailto:mkahal@exeterassociates.com)

Thomas P. Gadsden, Esquire  
Page 2

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,



Darryl A. Lawrence  
Assistant Consumer Advocate  
PA Attorney I.D. #93682

Enclosures

cc: All parties of record  
Rosemary Chiavetta, Secretary/Certificate only

\*151398

CERTIFICATE OF SERVICE

Joint Petition of Metropolitan Edison Company,	:	Docket Nos.
Pennsylvania Electric Company, Pennsylvania	:	P-2011-2273650
Power Company, and West Penn Power	:	P-2011-2273668
Company for Approval of Their Default Service	:	P-2011-2273669
Programs	:	P-2011-2273670

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Interrogatories, Set III, 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 29th day of December 2011.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Charles Shields, Esquire  
Bureau of Investigation and Enforcement  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105  
[chshields@pa.gov](mailto:chshields@pa.gov)

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

Thomas P. Gadsden, Esq.  
Kenneth M. Kulak, Esq.  
Anthony C. DeCusatis, Esq.  
Catherine G. Vasudevan, Esq.  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
[tgadsden@morganlewis.com](mailto:tgadsden@morganlewis.com)  
[kkulak@morganlewis.com](mailto:kkulak@morganlewis.com)  
[adecusatis@morganlewis.com](mailto:adecusatis@morganlewis.com)  
[cvasudevan@morganlewis.com](mailto:cvasudevan@morganlewis.com)

Bradley A. Bingaman, Esq.  
Tori L. Giesler, Esq.  
First Energy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, PA 19612-6001  
[bbingaman@firstenergycorp.com](mailto:bbingaman@firstenergycorp.com)  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

Daniel G. Asmus, Esq.  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101  
[dasmus@pa.gov](mailto:dasmus@pa.gov)

Charis Mincavage, Esq.  
Vasiliki Karandrikas, Esq.  
Teresa K. Schmittberger, Esq.  
McNees, Wallace & Nurick, LLC  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mwn.com](mailto:cmincavage@mwn.com)  
[tschmittberger@mwn.com](mailto:tschmittberger@mwn.com)

Daniel Clearfield, Esq.  
Jeffrey J. Norton, Esq.  
Carl R. Shultz, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[jnorton@eckertseamans.com](mailto:jnorton@eckertseamans.com)  
[cshultz@eckertseamans.com](mailto:cshultz@eckertseamans.com)

Noel Trask, Esq.  
Associate General Counsel  
Exelon Business Services Co., LLC  
300 Exelon Way  
Kennett Square, PA 19348  
[Noel.trask@exeloncorp.com](mailto:Noel.trask@exeloncorp.com)

Todd S. Stewart, Esq.  
Hawke Mckean & Sniscak, LLP  
100 North 10<sup>th</sup> Street  
P.O. Box 1778  
Harrisburg, PA 17105  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Gary Jeffries, Esq.  
Dominion Retail, Inc.  
501 Martindale St., Suite 400  
Pittsburgh, PA 15212-5817  
[gjeffries@dom.com](mailto:gjeffries@dom.com)

Regina L. Matz, Esq.  
Thomas, Long, Niesen & Kennard  
212 Locust Street  
P.O. Box 9500  
Harrisburg, PA 17108-9500  
[rmatz@thomaslonglaw.com](mailto:rmatz@thomaslonglaw.com)

Brian J. Knipe, Esq.  
Buchanan Ingersoll & Rooney, PC  
17 North Second Street, 15<sup>th</sup> Floor  
Harrisburg, PA 17101  
[Brian.knipe@bipc.com](mailto:Brian.knipe@bipc.com)

Divesh Gupta, Esq.  
Managing Counsel-Regulatory  
Constellation Energy  
100 Constellation Way, Suite 500C  
Baltimore, MD 21202  
[divesh.gupta@constellation.com](mailto:divesh.gupta@constellation.com)

Patrick M. Cicero, Esq.  
Harry S. Geller, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pciceroPULP@palegalaid.net](mailto:pciceroPULP@palegalaid.net)  
[HGellerPULP@palegalaid.net](mailto:HGellerPULP@palegalaid.net)

Amy M. Klodowski, Esq.  
FirstEnergy Solutions Corp.  
800 Cabin Hill Drive  
Greensburg, PA 15601  
[aklodow@firstenergycorp.com](mailto:aklodow@firstenergycorp.com)

Michael A. Gruin, Esq.  
Stevens & Lee  
17 North Second Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101  
[mag@stevenslee.com](mailto:mag@stevenslee.com)

Susan E. Bruce, Esq.  
McNees, Wallace & Nurick, LLC  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[sbruce@mwn.com](mailto:sbruce@mwn.com)

Benjamin L. Willey, Esq.  
Law Offices of Benjamin L. Willey  
7272 Wisconsin Ave.  
Suite 300  
Bethesda, MD 20814  
[blw@bwilleylaw.com](mailto:blw@bwilleylaw.com)



Darryl A. Lawrence  
Assistant Consumer Advocate  
PA Attorney I.D. # 93682  
Email: [DLawrence@paoca.org](mailto:DLawrence@paoca.org)

Aron J. Beatty  
Assistant Consumer Advocate  
PA Attorney I.D. # 86625  
Email: [ABeatty@paoca.org](mailto:ABeatty@paoca.org)

Tanya J. McCloskey  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50044  
Email: [TMcCloskey@paoca.org](mailto:TMcCloskey@paoca.org)

Counsel for  
Office of Consumer Advocate  
555 Walnut Street 5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
151034