

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

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

July 23, 2015

Karen O. Moury, Esq.  
Buchanan Ingersoll & Rooney PC  
409 N. Second Street  
Harrisburg, PA 17101-1357

RE: Commonwealth of Pennsylvania, by Attorney General  
KATHLEEN G. KANE, Through the Bureau of Consumer  
Protection,  
And  
TANYA J. McCLOSKEY, Acting Consumer Advocate,  
Complainants  
v.  
Respond Power, LLC,  
Respondent  
Docket No. C-2014-2427659

Dear Ms. Moury:

Enclosed please find Interrogatories and Requests for Production of Documents of the Joint Complainants Commonwealth of Pennsylvania and the Office of Consumer Advocate directed to Respond Power, Set VII. Kindly provide responses within 20 days pursuant to the Commission's rules.

Kindly produce your responses as they become available and provide copies of all responses to:

John M. Abel,  
Senior Deputy Attorney General  
Bureau of Consumer Protection  
15<sup>th</sup> Floor, Strawberry Square  
Harrisburg, PA 17120

Candis A. Tunilo  
Assistant Consumer Advocate  
Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17101

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We also request that you send a copy of the answers directly to the consultants listed below:

Barbara R. Alexander  
83 Wedgewood Drive  
Winthrop, Maine 04364  
Telephone: 207-395-4143  
E-Mail: [barbalex@ctel.net](mailto:barbalex@ctel.net)

Steven L. Estomin  
Exeter Associates, Inc.  
Suite 300  
10480 Little Patuxent Parkway  
Columbia, MD. 21044  
Telephone: 410-992-7500  
E-mail: [sestomin@exeterassociates.com](mailto:sestomin@exeterassociates.com)

Ashley E. Everette  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
E-Mail: [aeverette@paoca.org](mailto:aeverette@paoca.org)

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,



Candis A. Tunilo  
Assistant Consumer Advocate  
PA Attorney I.D. # 89891  
E-Mail: [CTunilo@paoca.org](mailto:CTunilo@paoca.org)

Enclosures

cc: All parties of record  
Rosemary Chiavetta, Secretary (Certificate of Service)

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CERTIFICATE OF SERVICE

Commonwealth of Pennsylvania, by :  
Attorney General KATHLEEN G. KANE, :  
Through the Bureau of Consumer Protection, :  
 :  
And :  
 :  
TANYA J. McCLOSKEY, Acting Consumer :  
Advocate, :  
Complainants :  
 :  
v. :  
 :  
RESPOND POWER, LLC, :  
Respondent :

Docket No. C-2014-2427659

I hereby certify that I have this day served a true copy of the foregoing document, the Interrogatories and Requests for Production of Documents of the Joint Complainants Commonwealth of Pennsylvania and the Office of Consumer Advocate directed to Respond Power, Set VII, in the manner and upon the persons listed below:

Dated this 23rd day of July 2015.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Adam D. Young, Esq.  
Michael Swindler, Esq.  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

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

Karen O. Moury, Esq.  
Buchanan Ingersoll & Rooney PC  
409 N. Second Street  
Harrisburg, PA 17101-1357

Sharon Webb, Esq.  
Office of Small Business Advocate  
Commerce Building, Suite 1102  
300 North Second Street  
Harrisburg, PA 17101

*Candis A. Tunilo*

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Candis A. Tunilo  
Assistant Consumer Advocate  
PA Attorney I.D. # 89891  
E-Mail: [CTunilo@paoca.org](mailto:CTunilo@paoca.org)

Kristine E. Robinson  
Assistant Consumer Advocate  
PA Attorney I.D. # 316479  
E-Mail: [KRobinson@paoca.org](mailto:KRobinson@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  
210489