

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

March 4, 2016

David B. MacGregor, Esquire
Christopher T. Wright, Esquire
Michael W. Hassell, Esquire
Post & Schell PC
17 North Second Street
12th Floor
Harrisburg, PA 17101

Re: Petition of PPL Electric Utilities Corporation
For Approval of a Default Service Program
And Procurement Plan for the Period
June 1, 2017 through May 31, 2021
Docket No. P-2016-2526627

Dear Counsel:

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

We request that the Company provide verified answers to these inquiries within ten (15) 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:

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

David B. MacGregor, Esquire
Christopher T. Wright, Esquire
Michael W. Hassell, Esquire
March 4, 2016
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,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824

Enclosures

cc: PUC Secretary Chiavetta, (letter and Certificate of Service only)
Certificate of Service

217990

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities Corporation :
For Approval of a Default Service Program : Docket Nos. P-2016-2526627
And Procurement Plan for the Period :
June 1, 2017 through May 31, 2021

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Interrogatories to PPL Electric Utilities Corporation – Set I, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 4th day of March 2016.

SERVICE BY HAND DELIVERY and FIRST CLASS MAIL

Gina L. Lauffer, Esquire
Bureau of Investigation & Enforcement
400 North Street
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

David B. MacGregor, Esquire
Christopher T. Wright, Esquire
Michael W. Hassell, Esquire
Post & Schell PC
17 North Second Street
12th Floor
Harrisburg, PA 17101

Paul E. Russell, Esquire
Kimberly A. Klock, Esquire
PPL Electric Utilities Corporation
2 North Ninth Street
Allentown, PA 18101

John Evans, Small Business Advocate
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101

Todd S. Stewart, Esquire
Hawke McKeon and Sniscak, LLP
100 North 10th Street
Harrisburg, PA 17101
NextEra Energy Power Marketing, LLC

Kenneth L. Mickens, Esquire
316 Yorkshire Drive
Harrisburg, PA 17111
Sustainable Energy Fund

H. Rachel Smith, Esquire
100 Constellation Way, Suite 500C
Baltimore, MD 21202
Exelon Business Services Corp.

Patrick M. Cicero, Esquire
Elizabeth R. Marx, Esquire
Joline Price, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
CAUSE-PA

/s/ Christy M. Appleby

Brandon J. Pierce
Assistant Consumer Advocate
PA Attorney I.D. #307665
E-Mail: BPierce@paoca.org

Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org

David T. Evrard
Assistant Consumer Advocate
PA Attorney I.D. # 33870
E-Mail: DEvrard@paoca.org

Aron J. Beatty
Senior Assistant Consumer Advocate
PA Attorney I.D. # 86625
E-Mail: ABeatty@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
217991