

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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consumer@paoca.org

March 8, 2016

David B. MacGregor, Esquire  
Christopher T. Wright, Esquire  
Michael W. Hassell, Esquire  
Post & Schell PC  
17 North Second Street  
12<sup>th</sup> 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 III, in the above-referenced proceeding. **Please note that by this letter, the OCA hereby withdraws OCA II-14 and has reissued the request as OCA III-4 due to an erroneous label in the Set II request.**

We request that the Company provide verified answers to these inquiries within twenty (20) 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:

Richard Hahn  
Daymark Energy Advisors  
One Washington Mall, 9<sup>th</sup> Fl.  
Boston, MA 02108  
E-Mail: [rhahn@daymarkea.com](mailto:rhahn@daymarkea.com)

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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/ Brandon J. Pierce  
Brandon J. Pierce  
Assistant Consumer Advocate  
PA Attorney I.D. #307665

Enclosures

cc: PUC Secretary Chiavetta, (letter and Certificate of Service only)  
Certificate of Service  
218137

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 III, 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 8<sup>th</sup> day of March 2016.

SERVICE BY HAND DELIVERY and FIRST CLASS MAIL

Gina L. Lauffer, Esquire  
Bureau of Investigation & Enforcement  
400 North Street  
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SERVICE BY E-MAIL and FIRST CLASS MAIL

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Office of Small Business Advocate  
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*Exelon Business Services Corp.*

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Pennsylvania Utility Law Project  
118 Locust Street  
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*CAUSE-PA*

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*Retail Energy Supply Association*

Charles E. Thomas III, Esquire  
Thomas Niesen & Thomas, LLC  
212 Locust Street, Suite 600  
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*Noble Americas Energy Solutions LLC*

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100 Pine Street  
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*PPLICA*

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