Morgan Lewis

Kenneth M. Kulak

Partner +1.215.963.5384 ken.kulak@morganlewis.com

March 25, 2024

VIA eFILING

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

Re: Petition of PECO Energy Company for Approval of Its Default Service Program 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 **PECO Energy Company's Responses to the following Interrogatories:**

- 1. Energy Justice Advocates, Set III, Question Nos. 1-2, 4, 6-10, 14-19 and 22-26.
- 2. Office of Consumer Advocate, Set I, Question Nos. 1-28.

As indicated on the enclosed Certificate of Service, copies have been served upon all parties of record.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Kenneth M. Kulak

Enclosures

c: Per Certificate of Service (w/encls.)

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PECO ENERGY :

COMPANY FOR APPROVAL OF ITS : DEFAULT SERVICE PROGRAM FOR :

THE PERIOD FROM JUNE 1, 2025 :

THROUGH MAY 31, 2029 :

Docket No. P-2024-3046008

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the foregoing documents on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

Barrett C. Sheridan
Andrew J. Zerby
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Philadelphia, PA 17101-1923
OCA2024PECODSP@paoca.org
Counsel for Office of Consumer
Advocate (OCA)

Charis Mincavage
Adeolu A. Bakare
McNees, Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17108-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
lcharleton@mcneeslaw.com
Counsel for Philadelphia Area
Industrial Energy Users Group

Steven C. Gray
Rebecca Lyttle
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov
relyttle@pa.gov
Counsel for Office of Small
Business Advocate (OSBA)

John F. Lushis, Jr.
Norris McLaughlin, P.A.
515 W. Hamilton Street, Suite 502
Allentown, PA 18101
jlushis@norris-law.com
Counsel for Calpine Retail Holdings, LLC

Lauren M. Burge
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219

<u>lburge@eckertseamans.com</u>

Counsel for Retail Energy Supply

Association and NRG Energy, Inc.

Daniela Rakhlina-Powsner
Robert W. Ballenger
Joline R. Price
Vikram A. Patel
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
drakhlinapowsner@clsphila.org
rballenger@clsphila.org
iprice@clsphila.org
vpatel@clsphila.org
Vpatel@clsphila.org
Counsel for Tenant Union Representative
Network (TURN) and Coalition for
Affordable Utility Services and Energy
Efficiency in Pennsylvania (CAUSE-PA)

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

Elizabeth J. Sher
Day Pitney LLP
One Jefferson Road
Parsippany, NJ 07054-2891
esher@daypitney.com
Counsel for Constellation NewEnergy, Inc.
and Constellation Energy Generation, LLC

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 Counsel for Retail Energy Supply Association and NRG Energy, Inc.

Devin McDougall
Clean Energy Program
Earthjustice
1617 John F. Kennedy Boulevard, Suite 2020
Philadelphia, PA 19103
dmcdougall@earthjustice.org
cweinberg@earthjustice.org
mdegasperi@earthjustice.org
Counsel for Energy Justice Advocates

Logan Welde
Senior Staff Attorney
Clean Air Council
1617 John F. Kennedy Boulevard, Suite 1130
Philadelphia, PA 19103
lwelde@cleanair.org
Counsel for Energy Justice Advocates

Alexander Judd
Day Pitney LLP
225 Asylum Street
Hartford, CT 06103
ajudd@daypitney.com
Counsel for Constellation NewEnergy, Inc.
and Constellation Energy Generation, LLC

Yenna Lee
Assistant General Counsel
1310 Point Street
Baltimore, MD 21231
yenna.lee@constellation.com
Counsel for Constellation NewEnergy, Inc.
and Constellation Energy Generation, LLC

Sophia Browning
Day Pitney LLP
555 11th Street NW
Washington, DC 20004
sbrowning@daypitney.com
Counsel for Constellation NewEnergy, Inc.
and Constellation Energy Generation, LLC

CONSULTANTS

Serhan Ogur
Exeter Associates, Inc.
10480 Little Patuxent Parkway, Suite 300
Columbia, MD 21044
OCA2024PECODSP@paoca.org
Consultant for OCA

Mr. Mark D. Ewen
Industrial Economics, Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
mewen@indecon.com
Consultant for OSBA

Karl R. Rábago
Rábago Energy
1350 Gaylord Street
Denver, CO 80206
karl@rabagoenergy.com
Consultant for Energy Justice Advocates

Barbara R Alexander
Barbara Alexander Consulting, LLC
44 Beech Street
Hallowell, ME 04347
OCA2024PECODSP@paoca.org
Consultant for OCA

Elizabeth Marx Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 emarx@pautilitylawproject.org Consultant for TURN and CAUSE-PA

Kenneth M. Kulak (Pa. No. 75509)

Learth M. Lile

Brooke E. McGlinn (Pa. No. 204918)

Maggie E. Curran (Pa. No. 330545) Morgan, Lewis & Bockius LLP

2222 Market Street

Philadelphia, PA 19103-3007

215.963.5384 (bus)

215.963.5001 (fax)

ken.kulak@morganlewis.com brooke.mcglinn@morganlewis.com

maggie.curran@morganlewis.com

Counsel for PECO Energy Company

Dated: March 25, 2024