

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

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

 @pa\_oca  
 /pennoca  
FAX (717) 783-7152  
consumer@paoca.org  
www.oca.pa.gov

March 29, 2024

**Via Electronic Mail Only**

Brooke E McGlinn, Esquire  
Kenneth M. Kulak, Esquire  
Maggie Curran, Esquire  
Morgan, Lewis & Bockius LLP  
2222 Market Street  
Philadelphia, PA 19103-3007  
brooke.mcglinn@morganlewis.com  
ken.kulak@morganlewis.com  
maggie.curran@morganlewis.com

Re: Petition of PECO Energy Company for  
Approval of its Default Service Program for  
the Period of June 1, 2025, through May 31,  
2029

Docket No. P-2024-3046008

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set 3, in the above-referenced proceedings. As these interrogatories contain **CONFIDENTIAL** material, the **CONFIDENTIAL VERSION** will only be served upon the Company and parties that have executed a non-disclosure certificate.

In accordance with the Commission's Rules of Practice and Procedure, as modified during the March 8, 2024 Prehearing Conference, we request PECO Energy 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.

Brooke E McGlinn, Esquire  
Kenneth M. Kulak, Esquire  
Maggie Curran, Esquire  
March 29, 2024  
Page 2

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 group e-mail, as listed below:

OCA2024PECODSP@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,

Andrew J. Zerby  
Assistant Consumer Advocate  
PA Attorney I.D. # 332222  
azerby@paoca.org

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service Only)  
Certificate of Service

CERTIFICATE OF SERVICE

Petition of PECO Energy Company for :  
Approval of its Default Service Program for : Docket No. P-2024-3046008  
the Period of June 1, 2025, through May 31,  
2029

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to PECO Energy Company, Set 3, 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. Note that only those parties designated with an asterisk (\*) below will receive service of confidential documents. This document was filed electronically on the Commission’s electronic filing system.

Dated this 29<sup>th</sup> day of March, 2024.

SERVICE BY E-MAIL ONLY

Brooke E McGlinn, Esquire  
Kenneth M. Kulak, Esquire  
Maggie Curran, Esquire  
Morgan, Lewis & Bockius LLP  
2222 Market Street  
Philadelphia, PA 19103-3007  
brooke.mcglinn@morganlewis.com  
ken.kulak@morganlewis.com  
maggie.curran@morganlewis.com  
*Counsel for PECO Energy Company*

Anthony Gay, Esquire  
Jack Garfinkle, Esquire  
Exelon  
2301 Market St.  
Legal Department S23-1  
Philadelphia, PA 19103  
Anthony.gay@exeloncorp.com  
Jack.garfinkle@exeloncorp.com

Brandon J. Pierce, Esquire  
Adesola K. Adegbesan, Esquire  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
Brandon.Pierce@exeloncorp.com  
adesola.adegbesan@exeloncorp.com  
*Counsel for PECO Energy Company*

Allison Kaster, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
akaster@pa.gov  
*Counsel for I&E*

SERVICE BY E-MAIL ONLY

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

Zachary M. Fabish  
Senior Attorney  
Sierra Club  
50 F Street, NW, 8<sup>th</sup> Floor  
Washington, D.C. 20001  
zachary.fabish@sierraclub.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*

\*Devin McDougall, Esquire  
Clean Energy Program  
Earthjustice  
1617 John F. Kennedy Blvd., Suite 2020  
Philadelphia, PA 19103  
dmcdougall@earthjustice.org  
cweinberg@earthjustice.org  
mdegasper@earthjustice.org  
*Counsel for Energy Justice Advocates*

\*Karen O. Moury, Esquire  
\*Deanne M. O'Dell, Esquire  
\*Lauren M. Burge, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
kmoury@eckertseamans.com  
dodell@eckertseamans.com  
lburge@eckertseamans.com  
*Counsel for NRG and RESA*

Adeolu A Bakare, Esquire  
Charis Mincavage, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
abakare@mcneeslaw.com  
cmincavage@mcneeslaw.com  
*Counsel for PAIEUG*

\*Daniela Rakhlina-Powsner, Esquire  
\*Robert W. Ballenger, Esquire  
\*Joline R. Price, Esquire  
\*Vikram A. Patel, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
drakhlinapowsner@clsphila.org  
rballenger@clsphila.org  
jprice@clsphila.org  
vpatel@clsphila.org  
*Counsel for TURN and CAUSE-PA*

Thomas F. Puchner, Esquire  
Phillips Lytle LLP  
30 South Pearl Street  
Albany, NY 12207-1537  
tpuchner@phillipslytle.com

\*John F. Lushis, Jr., Esquire  
Norris McLaughlin, P.A.  
515 West Hamilton Street – Suite 502  
Allentown, PA 18101  
jlushis@norris-law.com  
*Counsel for Calpine*

\*Elizabeth R. Marx, Esquire  
John Sweet, Esquire  
Ria Pereira, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
emarx@pautilitylawproject.org  
jsweet@pautilitylawproject.org  
rpereira@pautilitylawproject.org  
*Counsel for PULP*

SERVICE BY E-MAIL ONLY

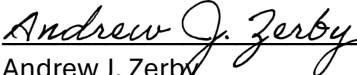
\*Elizabeth J. Sher, Esquire  
Day Pitney LLP  
One Jefferson Road  
Parsippany, NJ 07054-2891  
esher@daypitney.com  
*Counsel for Constellation  
NewEnergy Inc. and Constellation  
Energy Generation, LLC*

\*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*

Gregory L. Peterson, Esquire  
Phillips Lytle LLP  
201 West Third Street, Suite 205  
Jamestown, NY 14701-4907  
gpeterson@phillipslytle.com

  
Andrew J. Zerby  
Assistant Consumer Advocate  
PA Attorney I.D. # 332222  
azerby@paoca.org

Barrett C. Sheridan  
Assistant Consumer Advocate  
bsheridan@paoca.org

*Counsel for:*  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
717-783-5048

Dated: March 29, 2024