

# Morgan Lewis

**Kenneth M. Kulak**

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

April 5, 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 IV, Question Nos. 1 – 18;**
- 2. Office of Consumer Advocate, Set II, Question Nos. 1 - 5 (a-e, and h), 6, 8-23 (a), (b) and (d), 24-36, and 39-42; and**
- 3. Retail Energy Supply Association, Set I, Question Nos. 1 – 15.**

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

KMK/tp

Enclosure

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

**Morgan, Lewis & Bockius LLP**

2222 Market Street  
Philadelphia, PA 19103-3007  
United States

**T** +1.215.963.5000  
**F** +1.215.963.5001

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY** :  
**COMPANY FOR APPROVAL OF ITS** :  
**DEFAULT SERVICE PROGRAM FOR** : **Docket No. P-2024-3046008**  
**THE PERIOD FROM JUNE 1, 2025** :  
**THROUGH MAY 31, 2029** :

**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, 5<sup>th</sup> Floor  
555 Walnut Street  
Philadelphia, PA 17101-1923  
[OCA2024PECODSP@paoca.org](mailto:OCA2024PECODSP@paoca.org)  
*Counsel for Office of Consumer Advocate (OCA)*

Steven C. Gray  
Rebecca Lyttle  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto:relyttle@pa.gov)  
*Counsel for Office of Small Business Advocate (OSBA)*

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

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

Lauren M. Burge  
Eckert Seamans Cherin & Mellott, LLC  
600 Grant Street, 44<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)  
*Counsel for Retail Energy Supply Association and NRG Energy, Inc.*

Deanne M. O'Dell  
Karen O. Moury  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
*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](mailto:drakhlinapowsner@clsphila.org)  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[vpatel@clsphila.org](mailto:vpatel@clsphila.org)

*Counsel for Tenant Union Representative  
Network (TURN) and Coalition for  
Affordable Utility Services and Energy  
Efficiency in Pennsylvania (CAUSE-PA)*

Logan Welde  
Senior Staff Attorney  
Clean Air Council  
1617 John F. Kennedy Boulevard, Suite 1130  
Philadelphia, PA 19103  
[lwelde@cleanair.org](mailto:lwelde@cleanair.org)

*Counsel for Energy Justice Advocates*

Yenna Lee  
Assistant General Counsel  
1310 Point Street  
Baltimore, MD 21231  
[yenna.lee@constellation.com](mailto:yenna.lee@constellation.com)

*Counsel for Constellation NewEnergy, Inc.  
and Constellation Energy Generation, LLC*

Elizabeth J. Sher  
Day Pitney LLP  
One Jefferson Road  
Parsippany, NJ 07054-2891  
[esher@daypitney.com](mailto:esher@daypitney.com)

*Counsel for Constellation NewEnergy, Inc. and  
Constellation Energy Generation, LLC*

Zachary M. Fabish  
Senior Attorney  
Sierra Club  
50 F Street, NW, 8<sup>th</sup> Floor  
Washington, D.C. 20001  
[zachary.fabish@sierraclub.org](mailto:zachary.fabish@sierraclub.org)  
*Counsel for Energy Justice Advocates*

Devin McDougall  
Clean Energy Program  
Earthjustice  
1617 John F. Kennedy Boulevard, Suite 2020  
Philadelphia, PA 19103  
[dmcdougall@earthjustice.org](mailto:dmcdougall@earthjustice.org)  
[cweinberg@earthjustice.org](mailto:cweinberg@earthjustice.org)  
[mdegasper@earthjustice.org](mailto:mdegasper@earthjustice.org)  
*Counsel for Earth Justice Advocates*

Alexander Judd  
Day Pitney LLP  
225 Asylum Street  
Hartford, CT 06103  
[ajudd@daypitney.com](mailto:ajudd@daypitney.com)  
*Counsel for Constellation NewEnergy, Inc.  
and Constellation Energy Generation, LLC*

Sophia Browning  
Day Pitney LLP  
555 11<sup>th</sup> Street NW  
Washington, DC 20004  
[sbrowning@daypitney.com](mailto: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](mailto:OCA2024PECODSP@paoca.org)  
*Consultant for OCA*

Mr. Mark D. Ewen  
Industrial Economics, Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[mewen@indecon.com](mailto:mewen@indecon.com)  
*Consultant for OSBA*

Karl R. Rábago  
Rábago Energy  
1350 Gaylord Street  
Denver, CO 80206  
[karl@rabagoenergy.com](mailto:karl@rabagoenergy.com)  
*Consultant for Energy Justice Advocates*

Barbara R Alexander  
Barbara Alexander Consulting, LLC  
44 Beech Street  
Hallowell, ME 04347  
[OCA2024PECODSP@paoca.org](mailto:OCA2024PECODSP@paoca.org)  
*Consultant for OCA*

Elizabeth Marx  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)  
*Consultant for TURN and CAUSE-PA*

Becky Merola  
Director of Government & Regulatory Affairs  
Calpine Retail Holdings, LLC  
[becky.merola@calpinesolutions.com](mailto:becky.merola@calpinesolutions.com)  
*Consultant for Calpine*



---

Kenneth M. Kulak (Pa. No. 75509)  
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](mailto:ken.kulak@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)  
[maggie.curran@morganlewis.com](mailto:maggie.curran@morganlewis.com)

Dated: April 5, 2024

*Counsel for PECO Energy Company*