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



April 25, 2024

Via Electronic Mail Only

The Honorable Eranda Vero
The Honorable Arlene Ashton
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107

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 Judge Vero and Judge Ashton:

Enclosed please find a copy of the Direct Testimony being submitted on behalf of the Office of Consumer Advocate in the above-referenced proceeding, as follows:

OCA Statement 1: Direct Testimony of Serhan Ogur

(Public and CONFIDENTIAL versions)

OCA Statement 2: Direct Testimony of Barbara Alexander

(Public and CONFIDENTIAL versions)

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/Barrett C. Sheridan
Barrett C. Sheridan
Assistant Consumer Advocate
PA Attorney I.D. # 61138
BSheridan@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 Direct Testimony as follows:

OCA Statement 1 – Direct Testimony of Serhan Ogur (Public and **CONFIDENTIAL** versions)

OCA Statement 2 – Direct Testimony of Barbara Alexander (Public and **CONFIDENTIAL** versions)

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:

Dated this 25th day of April 2024.

* Received Confidential Version

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

Brandon J. Pierce, Esquire*

Adesola K. Adegbesan, Esquire*

PECO Energy Company

2301 Market Street, S23-1

Philadelphia, PA 19103

Brandon.Pierce@exeloncorp.com

maggie.curran@morganlewis.com

Counsel for PECO Energy Company

Allison Kaster, Esquire
Bureau of Investigation & Enforcement

Jack Garfinkle, Esquire

Exelon

Pennsylvania Public Utility Commission
Commonwealth Keystone Building

Commonwealth Reystone Building

2301 Market St.

400 North Street, 2nd Floor
Legal Department S23-1

Harrisburg, PA 17120

Philadelphia, PA 19103 akaster@pa.gov Jack.garfinkle@exeloncorp.com 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, 8th 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 mdegasperi@earthjustice.org

Counsel for Energy Justice Advocates

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*

SERVICE BY E-MAIL ONLY

Karen O. Moury, Esquire* Deanne M. O'Dell, Esquire* Lauren M. Burge, Esquire*

Eckert Seamans Cherin & Mellott, LLC

213 Market Street, 8th Floor Harrisburg, PA 17101

kmoury@eckertseamans.com dodell@eckertseamans.com lburge@eckertseamans.com Counsel for NRG and RESA

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

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

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

SERVICE BY E-MAIL ONLY

Alexander Judd*
Day Pitney LLP
225 Asylum Street Hartford, CT 06103
ajudd@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

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

/s/Barrett C. Sheridan
Barrett C. Sheridan
Assistant Consumer Advocate
PA Attorney I.D. # 61138
BSheridan@paoca.org

Andrew J. Zerby
Assistant Consumer Advocate
AZerby@paoca.org

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

Dated: April 25, 2024