

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560 (in PA only)

FAX (717) 783-7152
consumer@paoca.org

IRWINA. POPOWSKY
Consumer Advocate

December 31, 2008

Daniel Clearfield, Esquire
Carl R. Shultz, Esquire
Deanne O'Dell, Esquire
WolfBlock, LLP
213 Market Street, 9th Floor
Harrisburg, PA 17101

RE: Petition of PPL Electric Utilities
Corporation for Approval of a Default Service
Program and Procurement Plan for the Period
January 1, 2001 through May 31, 2014
Docket No. P-2008-2060309

Dear Mr. Clearfield:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set I addressed to Retail Energy Supply Association, in the above-referenced proceeding.

In accordance with the Scheduling Order entered on October 3, 2008, we request that the 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. 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
LaCapra Associates
One Washington Mall
9th Floor
Boston, MA 02108
Telephone: 617-778-2467
E-Mail: rhahn@lacapra.com

Daniel Clearfield, Esquire
Carl R. Shultz, Esquire
Deanne O'Dell, Esquire
December 31, 2008
Page 2

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 McNulty of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Respectfully Submitted,



Erin L. Gannon
Assistant Consumer Advocate
PA Attorney I.D. # 83487

Enclosures

cc: Certificate of Service

00107874.docx

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation :
for Approval of a Default Service Program : Docket No. P-2008-2060309
and Procurement Plan for the Period :
January 1, 2001 through May 31, 2014 :

INTERROGATORIES OF THE
OFFICE OF CONSUMER ADVOCATE
SET I

Pursuant to 52 Pa. Code § 5.341, the Office of Consumer Advocate hereby propounds the following Interrogatories to Retail Energy Supply Association to be answered by those officers, employees, agents, or contractors who have knowledge of the requested facts and who are authorized to answer on behalf of the Company. Each interrogatory is to be verified by the responding witness in accordance with 52 Pa. Code §5.342(a)(6).

DATED: December 31, 2008

Instructions

- 1) These interrogatories shall be construed as a continuing request. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as first becomes available to the Respondent after the answers hereto are filed.
- 2) Restate the interrogatory immediately preceding each response.
- 3) Identify the name, title, and business address of each person(s) providing each response.
- 4) Provide the date on which the response was created.
- 5) Divulge all information that is within the knowledge, possession, control, or custody of Respondent or may be reasonably ascertained thereby. The term “RESA” or “the Company,” or “you,” as used herein includes Retail Energy Supply Association, its attorneys, agents, employees, contractors, or other representatives.
- 6) Provide a verification by the responsible witness that all facts contained in the response are true and correct to the best of the witnesses knowledge, information and belief.
- 7) As used herein the word “document” or “workpaper” includes, but is not limited to, the original and all copies in whatever form, stored or contained in or on whatever media or medium including computerized memory, magnetic, electronic, or optical media, regardless of origin and whether or not including additional writing thereon or attached thereto, and may consist of:
 - a) notations of any sort concerning conversations, telephone calls, meetings or other communications;
 - b) bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys;
 - c) worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing.

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities Corporation :
for Approval of a Default Service Program : Docket No. P-2008-2060309
and Procurement Plan for the Period :
January 1, 2001 through May 31, 2014 :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Interrogatories, Set I addressed to Retail Energy Supply Association, 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 31st day of December 2008.

SERVICE BY E-MAIL and INTEROFFICE MAIL

Allison C. Kaster, Esquire
Office of Trial Staff
400 North Street, 2nd Floor West
P.O. Box 3265
Harrisburg, PA 17105-3265
Counsel for: *Office of Trial Staff*

SERVICE BY E-Mail and FIRST CLASS MAIL

David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103
Counsel for: *PPL Electric Utilities Corporation*

Michael W. Hassell, Esquire
Matthew J. Agen, Esquire
Post & Schell, P.C.
12th Floor
17 North Second Street
Harrisburg, PA 17101-1601
Counsel for: *PPL Electric Utilities Corporation*

Paul E. Russell
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Counsel for: *PPL Electric Utilities Corporation*

Christopher A. Lewis, Esquire
Christopher R. Sharp, Esquire
Blank Rome LLP
One Logan Square
Philadelphia, PA 19103
Counsel for: *Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc.*

Steven C. Gray
Assistant Small Business Advocate
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101
Counsel for: *Office of Small Business Advocate*

Brian Knipe, Esquire
Michael T. Killion, Esquire
Buchanan Ingersoll & Rooney, PC
One South Market Square
213 Market Street, 3rd Floor
Harrisburg, PA 17101-2121
Counsel for: *Reliant Energy, Inc.*

Mark A. Baird, Esquire
Reliant Energy, Inc.
7642 W. 450N
Sharpsville, IN 46068
Counsel for: *Reliant Energy, Inc.*

Eric J. Epstein
4100 Hillsdale Road
Harrisburg, PA 17112
Pro Se

Divesh Gupta, Esquire
Constellation NewEnergy Inc.
Suite 500
111 Market Place
Baltimore, MD 21202
Counsel for: *Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc.*

Craig Burgraff, Esquire
Todd S. Stewart, Esquire
Hawke, McKeon, Sniscak & Kennard, LLP
100 N. 10th Street
Harrisburg, PA 17101
Counsel for: *The Sustainable Energy Fund of Central Eastern Pennsylvania*

Craig A. Doll
Attorney At Law
P.O. Box 403
25 West Second Street
Hummelstown, PA 17036-0403
Counsel for: *Richards Energy Group, Inc. and the Richards Energy Affinity Program*

Charles E. Thomas, Jr., Esquire
Jennifer M. Sultzaberger, Esquire
Thomas, Long, Niesen & Kennard
P.O. Box 9500
212 Locust Street, Suite 500
Harrisburg, PA 17108-9500
Counsel for: *The Pennsylvania State University*

Thomas T. Niesen, Esquire
Thomas, Long, Niesen & Kennard
P.O. Box 9500
212 Locust Street, Suite 500
Harrisburg, PA 17108-9500
Counsel for: *Consolidated Edison Solutions, Inc.*

Paul F. Mapelli
Vice President and General Counsel
Consolidated Edison Solutions, Inc.
Suite 300 East
701 Westchester Avenue
White Plains, NY 10604
Counsel for: *Consolidated Edison Solutions, Inc.*

Jesse A. Dillon
Senior Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101-1179
Counsel for: *PPL EnergyPlus, LLC*

Pamela C. Polacek, Esquire
Shelby Linton-Keddie, Esquire
McNees Wallace & Nurick, LLC
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108-1166
Counsel for: *PP&L Industrial Customer Alliance*

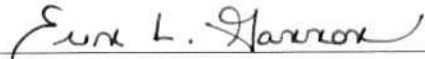
Daniel Clearfield, Esquire
Carl R. Shultz, Esquire
Deanne O'Dell, Esquire
WolfBlock, LLP
213 Market Street, 9th Floor
Harrisburg, PA 17101
Counsel for: *Direct Energy Services, LLC and Retail Energy Supply Association*

SERVICE BY FIRST CLASS MAIL

Mr. Frank Richards
Richards Energy Group, Inc.
Building #1
3901 Nolt Road
Landisville, PA 17538
Consultant for: *Richards Energy Group, Inc. and the Richards Energy Affinity Program*

Robert D. Knecht
Industrial Economic Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
Consultant for: *Office of Small Business Advocate*
(VIA E-mail and First Class Mail)

Robert E. Cooper, P.E.
Director, Energy and Engineering
Office of Physical Plant
The Pennsylvania State University
Room 208 Physical Plant Building
University Park, PA 16802-1118
Consultant for: *The Pennsylvania State
University*



Erin L. Gannon
PA Attorney I.D. # 83487
E-Mail: EGannon@paoca.org
James A. Mullins
PA Attorney I.D. # 77066
E-Mail: JMullins@paoca.org
Aron J. Beatty
Assistant Consumer Advocates
PA Attorney I.D. # 86625
E-Mail: ABeatty@paoca.org
Counsel for
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
00103776.docx