

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY  
Consumer Advocate

January 6, 2009

Daniel Clearfield, Esquire  
Carl R. Shultz, Esquire  
Deanne O'Dell, Esquire  
WolfBlock, LLP  
213 Market Street, 9<sup>th</sup> 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 III addressed to Direct Energy Services, LLC, 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:

Barbara R. Alexander  
83 Wedgewood Drive  
Winthrop, ME. 04364  
Telephone: 207-395-4143  
E-mail: [barbalex@ctel.net](mailto:barbalex@ctel.net)

Daniel Clearfield, Esquire  
Carl R. Shultz, Esquire  
Deanne O'Dell, Esquire  
January 6, 2009  
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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,

A handwritten signature in black ink that reads "Erin L. Gannon". The signature is written in a cursive style with a large initial "E" and a long, sweeping underline.

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

Enclosures  
cc: Certificate of Service

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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 :

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INTERROGATORIES OF THE  
OFFICE OF CONSUMER ADVOCATE  
SET III

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Pursuant to 52 Pa. Code § 5.341, the Office of Consumer Advocate hereby propounds the following Interrogatories to Direct Energy Services, LLC 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: January 6, 2009

## 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 "Direct Energy" or "the Company," or "you," as used herein includes Direct Energy Services, LLC, 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 III addressed to Direct Energy Services, LLC, 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 6<sup>th</sup> day of January 2009.

SERVICE BY E-MAIL and INTEROFFICE MAIL

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SERVICE BY FIRST CLASS MAIL

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