

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)

IRWINA. POPOWSKY  
Consumer Advocate

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

April 20, 2009

Romulo L. Diaz, Jr., Esquire  
PECO Energy Company  
2301 Market Street  
P.O. Box 8699  
Philadelphia, PA 19101-8699

Kenneth M. Kulak, Esquire  
Morgan, Lewis & Bockius, LLP  
1701 Market Street  
Philadelphia, PA 19103-2921

RE: Petition of PECO Energy Company For  
Approval to Procure Solar Alternative  
Energy Credits  
Docket No. P-2009-2094494

Dear Messrs Diaz and Kulak:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set I, in the above-referenced proceeding.

In accordance with the Prehearing Order entered on April 6, 2009, we request that the Company provide verified answers to these inquiries within seven (7) 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:

Steve Estomin  
Exeter Associates, Inc.  
5565 Sterrett Place  
Suite 310  
Columbia, MD 21044  
E-mail: sestomin@exeterassociates.com

Romulo L. Diaz, Jr., Esquire  
Kenneth M. Kulak, Esquire  
April 20, 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,



Darlene R. Wong  
Assistant Consumer Advocate  
PA Attorney I.D. # 87381

Enclosures

cc: All parties of record

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company :  
For Approval to Procure Solar : Docket No. P-2009-2094494  
Alternative Energy Credits :

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INTERROGATORIES OF THE  
OFFICE OF CONSUMER ADVOCATE  
SET I

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Pursuant to 52 Pa. Code Section 5.341, the Office of Consumer Advocate hereby propounds the following Interrogatories to PECO Energy Company 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: April 20, 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 “PECO” or “the Company,” or “you,” as used herein includes PECO Energy Company, 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 PECO Energy Company :  
For Approval to Procure Solar : Docket No. P-2009-2094494  
Alternative Energy Credits :

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 directed to PECO Energy Company, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 20<sup>th</sup> day of April 2009.

SERVICE BY E-MAIL and INTEROFFICE MAIL

Charles Daniel Shields, Esquire  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

Romulo L. Diaz, Jr., Esquire  
PECO Energy Company  
2301 Market Street  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
Counsel for: *PECO Energy Company*

Kenneth M. Kulak, Esquire  
Morgan, Lewis & Bockius, LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Counsel for: *PECO Energy Company*

Daniel G. Asmus  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Commerce Building, Suite 1102  
300 North Second Street  
Harrisburg, PA 17101  
Counsel for: *Office of Consumer Advocate*

Charis Mincavage, Esquire  
Barry A. Naum, Esquire  
McNees Wallace & Nurick LLC  
P.O. Box 1166  
100 Pine Street  
Harrisburg, PA 17108-1166  
Counsel for: *Philadelphia Area Industrial  
Energy Users Group*

Stephen L. Huntoon  
Senior Attorney  
NextEra Energy Resources, LLC  
801 Pennsylvania Avenue, N.W.  
Washington, DC 20001  
Counsel for: *NextEra Energy Resources, LLC*



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Darlene R. Wong  
Assistant Consumer Advocate  
PA Attorney I.D. # 87381  
E-Mail: DWong@paoca.org  
Tanya J. McCloskey  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50044  
E-Mail: TMcCloskey@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

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