

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

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

July 18, 2016

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

Re: Petition of PECO Energy Company for  
(1) Approval of its Microgrid Integrated Technology  
Pilot Plan and (2) Issuance of a Declaratory Order  
Regarding the Recovery of Microgrid Costs  
Docket No. P-2016-2546452

Application for Construction of Microgrid  
Distribution Energy Resources Fueled by Natural Gas  
Docket No. A-2016-2546450

Dear Counsel:

Enclosed you will find two copies of Data Requests of the Office of Consumer Advocate, Set III, in the above-referenced proceeding.

In accordance with the modified Commission's Rules of Practice and Procedure, 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 data requests as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Peter J. Lanzalotta  
Lanzalotta & Associates LLC  
67 Royal Pointe Drive  
Moss Creek Plantation  
Hilton Head Island, SC 29926  
E-mail: [petelanz@lanzalotta.com](mailto:petelanz@lanzalotta.com)

Kenneth M. Kulak, Esquire  
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If you have any questions, please call us. By copy of this letter, copies of these data requests have been served upon all parties. A certificate of service showing service of these data requests on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Respectfully submitted,

/s/ Lauren M. Burge

Lauren M. Burge  
Assistant Consumer Advocate  
PA Attorney I.D. 311570  
E-Mail: [LBurge@paoca.org](mailto:LBurge@paoca.org)

Enclosures

cc: PUC Secretary Chiavetta, (letter and Certificate of Service only)  
Certificate of Service

\*223821

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company for	:	
(1) Approval of its Microgrid Integrated	:	
Technology Pilot Plan and (2) Issuance of	:	Docket No. P-2016-2546452
A Declaratory Order Regarding the	:	
Recovery of Microgrid Costs	:	
Application for Construction of Microgrid	:	
Distribution Energy Resources fueled by	:	Docket No. A-2016-2546450
Natural Gas	:	

I hereby certify that I have this day served a true copy of the following documents, the Office of Consumer Advocate’s Interrogatories to PECO – Set III, 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 18<sup>th</sup> day of July 2016.

SERVICE BY HAND DELIVERY and FIRST CLASS MAIL

Phillip C. Kirchner, Esquire  
Bureau of Investigation & Enforcement  
400 North Street  
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

Michael S. Swerling, Esquire  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103

Kenneth M. Kulak, Esquire  
Morgan, Lewis & Bockius  
1701 Market Street  
Philadelphia, PA 19103  
*PECO Energy*

Charis Mincavage, Esquire  
Adeolu A. Bakare, Esquire  
Alessandra L. Hylander, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108  
*PAIEUG*

Elizabeth Rose Triscari, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 202,  
Harrisburg, PA 17101

Daniel Clearfield, Esquire  
Deanne M. O'Dell, Esquire  
Sarah C. Stoner, Esquire  
Eckert Seamans Cherin & Mellott LLC  
213 Market St., 8<sup>th</sup> Floor  
P.O. Box 1248  
Harrisburg, PA 17101  
*Direct Energy/RESA*

/s/ Lauren M. Burge

Lauren M. Burge  
Assistant Consumer Advocate  
PA Attorney I.D. 311570  
E-Mail: [LBurge@paoca.org](mailto:LBurge@paoca.org)

Aron J. Beatty  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 86625  
E-Mail: [ABeatty@paoca.org](mailto:ABeatty@paoca.org)

Darryl A. Lawrence  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 93682  
E-Mail: [DLawrence@paoca.org](mailto:DLawrence@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  
223819