

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
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consumer@paoca.org

July 25, 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 IV, 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.

Please note that the company has marked these documents as proprietary, but the OCA reserves the right to challenge such treatment.

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

July 18, 2016

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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

\*224184

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 Proprietary Interrogatories to PECO – Set V, 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 25<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

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Daniel Clearfield, Esquire  
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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  
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