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

March 9, 2017

Anthony C. DeCusatis Morgan, Lewis & Bockius LLP 1701 Market Street Philadelphia, PA 19103-2921

RE: Petition of Pennsylvania Electric Co.

For Approval of its DSIC

Docket Nos. P-2015-2508936,

C-2016-2531060

Dear Counsel:

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

In accordance with the Commission's Rules of Practice and Procedure as modified by the August 12, 2016 Scheduling Order, 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:

Ralph Smith Larkin & Associates 15728 Farmington Road Livonia, MI 48154 E-Mail: rsmithla@aol.com Anthony C. DeCusatis March 9, 2017 Page 2

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).

Sincerely,

/s/ <u>Erin L. Gannon</u> Senior Assistant Consumer Advocate PA Attorney I.D. # 83487 E-Mail: EGannon@paoca.org

Enclosures

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

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CERTIFICATE OF SERVICE

Petition of Pennsylvania Electric Company

for Approval of a Distribution System : Docket Nos. P-2015-2508936, Improvement Charge : C-2016-2531060

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories, Set I, 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 9th day of March, 2017.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Daniel G. Asmus Small Business Advocate Office of Small Business Advocate 300 North Second Street Harrisburg, PA 17101

SERVICE BY E-MAIL & FIRST CLASS MAIL

John L. Munsch Pennsylvania Power Company 800 Cabin Hill Drive Greensburg, PA 15601 Counsel for Pennsylvania Electric Company Anthony C. DeCusatis Morgan, Lewis & Bockius LLP 1701 Market Street Philadelphia, PA 19103-2921 Counsel for Pennsylvania Electric Company

Charis Mincavage, Esquire Alessandra L Hylander, Esquire McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 Representing Penelec Industrial Customer Alliance

SERVICE BY FIRST CLASS MAIL

E. McCauley 2550 State Route 49 Westfield, PA 16950-1009 Michele Perry 1037 Vankirk Road Newfield, NY 14867

/s/ Erin L. Gannon

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