



Email: William.Oleckna@davisbucco.com

August 14, 2017

VIA REGULAR MAIL

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O Box 3265
Harrisburg, PA 17105-3265

**Re: Crescent Hotel Plymouth Meeting, L.P. vs. PECO, et al.
Docket Nos.: C-2008-2068258; C-2008-2068267; C-2009-2089563
Our File No.: B-2408-A**

Dear Secretary Chiavetta:

Enclosed for filing is the original of Crescent Hotel Plymouth Meeting, L.P.'s Witness Identification in the above-referenced proceeding.

Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'William D. Oleckna', written in a cursive style.

William D. Oleckna

WDO/mcm

Enclosure

cc: Paul A. Bucco, Esquire (*via email*)
Ward L. Smith, Esquire (*via email*)
Christopher T. Wright, Esquire (*via email*)
David MacGregor, Esquire (*via email*)
Marta Guhl, Administrative Law Judge (*via first class mail & email*)
Celeren Corporation (*via first class mail*)
Pamela McNeal (*via email*)

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SECRETARY'S BUREAU

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PENNSYLVANIA. NEW JERSEY.

DAVIS BUCCO

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(610) 238-0880

Attorneys for Complainant

PENNSYLVANIA PUBLIC UTILITY COMMISSION

CRESCENT HOTEL PLYMOUTH MEETING, LP :

Complainant

v.

PECO ENERGY,
EXELON CORPORATION
CELEREN CORPORATION and
UGI ENERGY SERVICES, INC.
Defendants

C-2008-2068258

C-2008-2068267

C-2009-2089563

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COMPLAINANT'S WITNESS IDENTIFICATION

Pursuant to § 333(c), the Complainant – Crescent Hotel Plymouth Meeting, L.P. (“Crescent”) – by and through its undersigned counsel, Davis Bucco, identifies and makes available to all parties of the proceeding the names of the witnesses it expects to call and the subject matter of their expected testimony:

Brian O’Keefe

Crescent Hotels & Resorts
10306 Eaton Place #430
Fairfax, VA 22030 USA

Mr. O’Keefe is a Regional Controller for Crescent Hotels & Resorts. Mr. O’Keefe was personally involved in this matter and is expected to testify about the billing and payment dispute regarding Crescent, Celeren, UGI and/or PECO; as well as agreements, relationships, and communications then exchanged.

Tony Lucca

Crescent Hotels & Resorts
4101 B Island Ave
Philadelphia, PA 19153

Mr. Lucca was the general manager at Crescent Hotel Plymouth Meeting at the time this matter developed. He is expected to be a fact witness regarding the history of the dispute,

relationship between the parties, agreements in force at the time, communications conducted, as well as circumstances and events that led to this action.

Robert Smith

Crescent Hotels & Resorts
10306 Eaton Place #430
Fairfax, VA 22030 USA

Mr. Smith is the Chief Financial Officer for Crescent Hotels & Resorts. Mr. Smith will testify about Crescent's customs and practices with regard to this manner of dispute, industry custom, record-keeping and management, and financial planning and systems.

Paul Conkle

Crescent Hotels & Resorts
10306 Eaton Place #430
Fairfax, VA 22030 USA

Mr. Conkle is a Senior Vice President of Finance with regard to hotel accounting. Mr. Conkle will testify about Crescent's customs and practices in this particular area, payment disputes, financial management and planning, and as well as financial records and their keeping within Crescent.

Gerald McCabe

Mitts Law, LLC
1822 Spruce Street
Philadelphia, PA 19103

Mr. McCabe is a former employee or agent of Celeren Corporation. Mr. McCabe is expected to be a fact witness regarding the payment dispute whose testimony may concern the bankruptcy of Celeren, its contract with Crescent, agreements that were entered with PECO, the history of this matter, and payments made by Crescent to Celeren¹.

Gary Dean

South Jersey Energy Company
One North White Horse Pike
Hammonton, New Jersey 08037

Mr. Dean is a former employee or agent of Celeren Corporation. Upon information and belief, Mr. Dean has information about the facts of this dispute and would testify

¹ Complainant obtained a Subpoena for documents and interrogatories that is being served on Mr. McCabe. After Complainant receives Answers and Documents, it intends to supplement what testimony is expected from Mr. McCabe.

regarding the history of this dispute, the relationship of the parties, the parties' agreements, and payments made by Crescent.²

Crescent reserves the right and hereby incorporates the witnesses identified by PECO in its Witness Identification to be called by Complainant. Specifically, they are:

Ms. Ferrier and Mr. Prendergast, who were identified by PECO as possessing knowledge about Crescent's account and billing history with PECO.

Mr. Bisti and Mr. McCawley, who were identified by PECO as possessing knowledge as to PECO's practice in interacting with Electricity Generation Suppliers and customer agents.

Additionally, in accordance with the Public Utility Commission statutes, Crescent reserves the right to supplement, amend, or delete the names of witnesses they plan to call and the subject matter of the expected testimony as discovery reveals additional information and/or as good cause necessitates because discovery in on-going after this matter was stayed for several years due to Celeren's bankruptcy.

Respectfully submitted,



Paul A. Bucco, Esquire
William D. Oleckna, Esquire
Attorney for Complainant,
Crescent Hotel Plymouth Meeting, L.P.
610-238-0880
woleckna@davisbucco.com

Dated: August 14, 2017

² Complainant is also serving a subpoena on Mr. Dean. Mr. Dean's objection to the subpoena stated that he does not believe he has "any information that will be of assistance to the case", however, after he responds to interrogatories under oath, Complainant will either amend his expected testimony appropriately or delete him as a witness if he will not be of assistance.

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Attorneys for Complainant

PENNSYLVANIA PUBLIC UTILITY COMMISSION

CRESCENT HOTEL PLYMOUTH MEETING, LP :	:	
	:	
Complainant	:	C-2008-2068258
	:	
v.	:	C-2008-2068267
	:	
PECO ENERGY,	:	C-2009-2089563
EXELON CORPORATION	:	
CELEREN CORPORATION and	:	
UGI ENERGY SERVICES, INC.	:	
Defendants	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing Witness Identification were served upon the following persons via first class mail, postage prepaid, and/or email at the following address on **August 14, 2017**:

VIA FIRST CLASS MAIL
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

VIA E-MAIL
Marta Guhl, Administrative Law Judge
Pa. Public Utility Commission
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Pamela McNeal
Legal Assistant to ALJ Guhl
pmcneal@pa.gov

VIA FIRST CLASS MAIL
Marta Guhl, Administrative Law Judge
Pa. Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107


Celeren Corporation
Two Bala Plaza, Suite 300
Bala Cynwyd, PA 19004

Dated: 8/14/17

By: 

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