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April 23, 2019

VIA eFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
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Harrisburg, PA 17105-3265

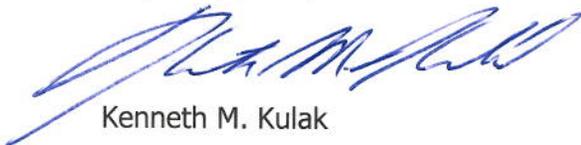
Re: Office of Consumer Advocate v. PECO Energy Company
Docket Nos. M-2018-3005860 and C-2018-3006242

Dear Secretary Chiavetta:

Enclosed please find **PECO Energy Company's Prehearing Conference Memorandum** in the above-referenced proceedings. Copies have been served on Administrative Law Judge Marta Guhl and the parties/intervenors of record in accordance with the attached Certificate of Service.

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

Very truly yours,



Kenneth M. Kulak

KMK/tp
Enclosures

c: Per Certificate of Service (w/encls.)

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

OFFICE OF CONSUMER ADVOCATE	:	
	:	
v.	:	Docket Nos. M-2018-3005860
	:	C-2018-3006242
PECO ENERGY COMPANY	:	

**PREHEARING CONFERENCE MEMORANDUM OF
PECO ENERGY COMPANY**

TO ADMINISTRATIVE LAW JUDGE MARTA GUHL:

Pursuant to the Pennsylvania Public Utility Commission’s (“Commission’s”) regulations at 52 Pa. Code § 5.222(d), PECO Energy Company (“PECO” or the “Company”) hereby submits its Prehearing Conference Memorandum in the above-captioned proceeding.

I. BACKGROUND AND HISTORY OF THE PROCEEDING

This proceeding relates to Supplement No. 76 to PECO’s Tariff Electric-Pa. P.U.C. No. 5 (“Supplement No. 76”), which PECO filed with the Commission on November 7, 2018 at Docket No. M-2018-3005860. Supplement No. 76, which bore an effective date of December 1, 2018, was filed to make a semiannual adjustment to the Company’s previously approved Non-Bypassable Transmission Charge (“NBT”). In Supplement No. 76, PECO proposed to flow through to customers certain retrospective adjustments to prior PJM Interconnection, L.L.C. (“PJM”) bills that will be made pursuant to a transmission rate settlement (“Settlement”) approved by the Federal Energy Regulatory Commission (“FERC”).

Overview Of PECO's Ratemaking Treatment Of PJM Transmission-Related Costs.

PJM first began to impose Regional Transmission Expansion Plan ("RTEP") charges in the PECO Zone on June 1, 2007. PECO's base rates in effect at the time PJM initiated RTEP charges were established in PECO's 1989 base rate case and were subsequently unbundled effective January 1, 1999 in conjunction with PECO's Commission-approved Restructuring Plan.¹ Those base rates did not provide for the recovery of any RTEP charges because PECO was not yet incurring those charges.

PECO did not file another distribution rate case until March 2010. In its 2010 case, PECO proposed to remove PJM-related transmission costs from base rates and recover those costs through a reconcilable transmission service charge ("TSC") under Section 1307 of the Public Utility Code.² The Commission approved PECO's proposal, and the base rates and TSC approved by the Commission in the 2010 rate case became effective on January 1, 2011.

PECO's existing NBT was implemented on June 1, 2015, in accordance with the Commission's directive in the Company's third default service proceeding. In that proceeding, the Commission directed that certain PJM charges, including RTEP, should be recovered on a non-bypassable basis rather than through PECO's bypassable TSC.³

Adjustments To Prior PJM Billings For RTEP Charges Under The Settlement. In its Order No. 494, issued in 2007, FERC adopted a methodology for allocating RTEP costs

¹ *Application of PECO Energy Co. for Approval of Its Restructuring Plan Under Section 2806 of the Public Utility Code et al.*, Docket Nos. R-00973953 and P-00971265 (Joint Petition for Settlement filed Apr. 29, 1998) ("Restructuring Plan"), p. 11. The Restructuring Plan was approved by the Commission in its Order and Opinion entered on May 14, 1998.

² 66 Pa. C.S. §1307(a).

³ *Petition of PECO Energy Co. for Approval of Its Default Serv. Program for the Period from June 1, 2015 Through May 31, 2017*, Docket No. P-2014-2409362 (Order entered Dec. 4, 2014), p. 46.

among transmission owners.⁴ The entry of FERC Order No. 494 initiated more than a decade of litigation in which certain owners of transmission within PJM, including PECO, contested the RTEP cost allocation methodology the FERC had adopted. That litigation was resolved by the Settlement, which the FERC approved on May 31, 2018.⁵

The Settlement implements a schedule of adjustments to PJM's prior-period billings for RTEP charges. These billing adjustments are based on a method of allocating costs for RTEP transmission enhancements that differs from the method used to calculate the bills PJM originally issued to comply with FERC Order No. 494. The total net bill credits that PECO will receive under the Settlement are adjustments to RTEP charges PECO paid between June 1, 2007 and January 1, 2016.

Applying the terms of the Settlement to the most recent data available from PJM, PECO will receive approximately \$83 million in total net credit adjustments to prior-period bills,⁶ which PJM will furnish to PECO over a period that began in July 2018 and will continue through 2025. PECO's new NBT rates under Supplement No. 76 were calculated to flow through to the Company's distribution customers all of the PJM RTEP billing adjustments that relate to the periods when customers paid TSC or NBT charges that included PJM's RTEP charges. Specifically, PECO reduced the NBT costs that would otherwise be recoverable under Supplement No. 76 by approximately \$56 million to reflect the PJM bill credits for the post-2010 period that PECO anticipates receiving by May 31, 2019. Credits for the post-2010 period that PECO receives after May 31, 2019 will be passed through to customers as reductions to PECO's NBT-recoverable costs in subsequent recalculations of PECO's NBT rate.

⁴ *PJM Interconnection, L.L.C.*, Opinion No. 494, 119 FERC ¶ 61,308 at 45-46 (2007).

⁵ *PJM Interconnection, L.L.C.*, Order on Contested Settlement, 163 FERC ¶ 61,168 (2018).

⁶ As explained in PECO's Answer and New Matter, the sum of \$83 million is an upward revision of the estimate of \$79.5 million set forth in the original NBT filing.

The rates set forth in Supplement No. 76 do not reflect credits that will be paid for RTEP charges imposed by PJM prior to January 1, 2011, and paid by PECO prior its 2010 base rate case and the introduction of the TSC on January 1, 2011. The credits for those pre-2011 billing adjustments total approximately \$5.5 million.

On the other hand, PECO excluded from its NBT calculation in Supplement No. 76 the billing adjustments made, pursuant to the Settlement, to the RTEP charges PJM imposed prior to January 1, 2011. Those pre-2011 billing adjustments that have been or will be excluded from NBT calculations total approximately \$5.5 million.

Procedural History. On November 28, 2018, the Commission issued a Secretarial Letter at Docket No. M-2018-3005860 in which it stated that PECO's proposed rates set forth in Supplement No. 76 "are consistent with the tariff and, accordingly, are permitted to become effective as filed" beginning on December 1, 2018.

Later in the day on November 28, 2018, after the issuance of the Commission's Secretarial Letter, the Office of Consumer Advocate ("OCA") filed the above-captioned Complaint. The OCA's Complaint contains only two fundamental factual averments: (1) PECO will receive PJM bill credits under the FERC-approved Settlement and (2) PECO will exclude \$5.5 million of those bill credits in the Company's semiannual adjustments to the NBT. Based solely on those averments, the OCA alleges that it may be unreasonable and otherwise contrary to law or ratemaking policy for PECO not to refund to customers all of the prior-period bill adjustment credits (i.e., for periods both before and after January 1, 2011) that PJM is furnishing to PECO pursuant to the Settlement.

The Complaint does not state or provide any additional factual detail as to why the OCA believes that PECO's proposal is unreasonable. Accordingly, on December 19, 2018, the

Company filed a Preliminary Objection seeking a more specific pleading under 52 Pa. Code § 5.101(a)(3). The OCA filed an Answer to the Company's Preliminary Objection on December 31, 2018. In its Answer, the OCA contended that PECO is not entitled to a more specific pleading because the OCA is not obliged to aver the fundamental factual or legal premises for the broad, conclusory statement in its Complaint that PECO's NBT is allegedly unlawful, unjust and unreasonable.

On January 8, 2019, this matter was assigned to Administrative Law Judge Marta Guhl (the "ALJ") to address PECO's Preliminary Objection. On February 8, 2019, the ALJ overruled the Company's Preliminary Objection, finding that the OCA's Complaint was legally sufficient because it stated the "act or thing" (exclusion of \$5.5 million of PJM billing adjustments under the Settlement from the NBT calculations) that the OCA claims is in violation of the Public Utility Code. In the February 8, 2019 Order Denying PECO Energy Company's Preliminary Objection, the ALJ also directed PECO to file an Answer to the OCA's Complaint within twenty days.

On February 28, 2019, PECO filed an Answer and New Matter to the OCA's Complaint. In the Answer and New Matter, PECO explained that the TSC (and the subsequently approved NBT) recovered from customers, on a fully-reconcilable basis, PJM transmission costs, including RTEP charges, from and after January 1, 2011. Therefore, PECO denied that the NBT rate calculated under Supplement No. 76, which reflects all PJM billing adjustments to RTEP charges paid by PECO after January 1, 2011, is unreasonable.

II. STATEMENT OF ISSUES

The principal issue before the Commission in this proceeding is whether PECO is required to include the Settlement's retrospective billing adjustments made, pursuant to the

Settlement, to the RTEP charges PJM imposed on PECO between June 2007 and December 31, 2010 in the Company's NBT rate formula. As discussed above, PECO's Commission-approved base rates in effect during that period were based on a revenue requirement that did not include any of the RTEP charges PECO paid. PJM transmission-related costs, including RTEP charges, were recovered from customers on a full and current basis through the TSC or NBT from and after January 1, 2011. The doctrine of Commission-made rates and the associated prohibitions against retroactive and single-issue ratemaking preclude the Commission from requiring PECO to refund PJM bill adjustments to RTEP charges paid by PECO before January 1, 2011 to its customers.⁷ Accordingly, PECO properly limited PJM billing adjustments included in its NBT rate calculation to the periods when customers paid TSC and NBT charges that reflected PJM RTEP charges.

III. DISCOVERY

On January 4, 2019, PECO initiated the discovery process in this proceeding and served its Interrogatories (Set I) Nos. 1-9. Those Interrogatories are narrowly tailored to identify the factual averments upon which the OCA relies for its allegation that PECO's NBT adjustment may be unlawful, unjust and unreasonable. The OCA objected to all of PECO's Set I Interrogatories on January 14, 2019 and PECO filed a Motion to Dismiss Objections and Compel Answers ("Motion to Compel") on January 24, 2019. To date, the OCA has propounded four sets of interrogatories. As of April 25, 2019, PECO will have fully responded to OCA Sets I

⁷ *Cheltenham & Abington Sewerage Co. v. Pa. P.U.C.*, 25 A.2d 334, 337 (Pa. 1942) (holding that "a commission-made rate furnishes the applicable law for the utility and its customers until a change is made by the commission."). Applying *Cheltenham*, the Pennsylvania Superior Court held in *West Penn Power Co. v. Pa. P.U.C.*, 100 A.2d 110, 114 (Pa. Super. 1953), that the Commission "could not give retroactive effect" to a rate determination and "direct refunds to consumers" for charges billed pursuant to "previously approved" rates. Thus, in *Phila. Elec. Co. v. Pa. P.U.C.*, 502 A.2d 722, 727-28 (Pa. Cmwlth. 1985), the Pennsylvania Commonwealth Court clearly articulated the "general rule" under Pennsylvania law that "there may be no line by line examination" of "particular items of expense or revenue," and, therefore, variations in "an isolated item of revenue or expense" alone cannot support "a Commission order of refund or recovery."

through IV. The OCA has indicated that it plans to serve a fifth set of interrogatories shortly (while PECO is preparing its Direct Testimony), and that the OCA is likely to serve additional discovery after it reviews PECO's Direct Testimony. PECO intends to timely answer any such additional discovery served by the OCA.

PECO will work with the other parties and the ALJ to develop a reasonable schedule for ongoing discovery. To that end, PECO respectfully requests that the ALJ issue a decision on PECO's pending Motion to Compel. In addition, PECO proposes that a Protective Order be adopted in this case to protect from public disclosure any sensitive information⁸ that may be produced in response to discovery or presented for the record. Therefore, PECO respectfully requests that the ALJ approve the proposed Protective Order attached hereto as Appendix "A," which is similar to the Protective Order entered in PECO's most recent base rate case proceeding at Docket No. R-2018-300164. The Company also proposes that the ALJ adopt the modifications to the Commission's discovery regulations, as shown in Appendix "B."

IV. SERVICE LIST

Pursuant to 52 Pa. Code § 1.55, PECO hereby designates the following individual for the service list in this proceeding:

Ward L. Smith
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103
215.841.6863 (bus)
ward.smith@exeloncorp.com

⁸ See, e.g., *Public Utility Confidential Security Information Disclosure Protection Act*, 35 P.S. §§ 2141.1-2141.6 and 52 Pa. Code §§ 102.1-102.4.

Parties are requested to also serve documents on the following attorneys as a courtesy:

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V. WITNESSES

The Company expects to present testimony by Mr. Joseph A. Bisti to describe the terms of the Settlement that resulted in PJM adjusting RTEP charges for historical billing periods and respond to the allegations raised by the OCA regarding how those billing adjustments will be reflected in NBT rate calculations. Mr. Bisti is employed by PECO as a Principal Regulatory and Rates Specialist. His business address is 2301 Market Street, Philadelphia, Pennsylvania 19103 and his phone number is 215.841.5626. While PECO can foresee calling Mr. Bisti as the Company's witness, it is not able to determine its final list of all witnesses until it obtains and reviews the other parties' direct testimony. Accordingly, in the event written testimony may be required, PECO reserves the right to amend its list of witnesses as it determines necessary or appropriate to address issues as they develop over the course of this proceeding.

VI. PROPOSED SCHEDULE

PECO will cooperate with the ALJ, the OCA and other parties to facilitate the orderly conduct and disposition of this proceeding. PECO has consulted with the other parties in this proceeding, and the OCA and Office of Small Business Advocate have indicated that they find the following proposed schedule acceptable or do not otherwise object:⁹

⁹ As of the date of submission of this Prehearing Conference Memorandum, the Commission's Bureau of Investigation and Enforcement has not yet responded to the proposed schedule circulated among the parties.

Prehearing Conference	April 26, 2019
PECO Direct Testimony Due	June 5, 2019
OCA and Other Parties' Direct Testimony Due	August 5, 2019
PECO Rebuttal Testimony Due	October 4, 2019
OCA and Other Parties' Surrebuttal Testimony Due	October 24, 2019
Oral Rejoinder and Evidentiary Hearings	November 13-14, 2019
Main Briefs Due	January 14, 2020
Reply Briefs Due	February 13, 2020

All proposed dates for submission of testimony and briefs are for “in-hand” delivery, which may be satisfied by an e-mail or fax copy of the relevant documents.

VII. POSSIBILITY OF SETTLEMENT

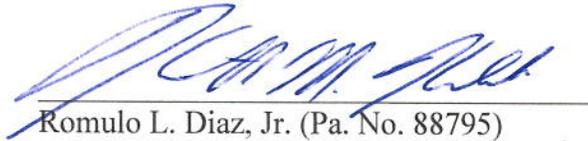
PECO intends to engage in settlement discussions with the other parties in this proceeding with the goal of facilitating an effective resolution of this matter.

VIII. CONCLUSION

WHEREFORE, PECO Energy Company submits this Prehearing Memorandum and respectfully requests that the Administrative Law Judge adopt the proposed procedural schedule,

approve the proposed modifications to the discovery rules and enter the proposed Protective Order provided herewith.

Respectfully submitted,



Romulo L. Diaz, Jr. (Pa. No. 88795)

Jack R. Garfinkle (Pa. No. 81892)

Ward L. Smith (Pa. No. 47670)

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Dated: April 23, 2019

Counsel for PECO Energy Company

APPENDIX A

PROPOSED PROTECTIVE ORDER

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

OFFICE OF CONSUMER ADVOCATE	:	
	:	
v.	:	Docket Nos. M-2018-3005860
	:	C-2018-3006242
PECO ENERGY COMPANY	:	

PROTECTIVE ORDER

This Protective Order is hereby GRANTED with respect to all documents and information, as identified below, produced or presented, or hereafter produced or presented, in this proceeding. All persons now or hereafter granted access to such documents and/or information shall use and maintain the same only in strict accordance with this Protective Order.

This Protective Order is being entered to facilitate the orderly production of information and documents during discovery and the presentation of evidence at the hearings in this case, and to provide adequate protection of Confidential Information without prejudicing the rights of parties to have reasonable access to information that becomes part of the evidentiary record.

THEREFORE, IT IS ORDERED THAT:

1. Any information provided to the Pennsylvania Public Utility Commission (Commission) or any parties in connection with the above-captioned proceeding that a producing party claims constitutes or contains Confidential Information shall be specifically identified and marked as Confidential Information. The producing party shall designate data or documents as constituting or containing Confidential Information by affixing a conspicuous “CONFIDENTIAL” stamp or typewritten designation on such data or documents. Where only part of data compilations or multi-page documents constitutes or contains Confidential

Information, the producing party, insofar as reasonably practicable within time constraints imposed in this proceeding, shall designate only the specific data or pages of documents which constitute or contain Confidential Information and shall serve such documents separately from non-confidential information.

2. Each document and the information contained therein designated as “Confidential Information” shall be used by the recipient solely for purposes relating to the prosecution, review and processing of this proceeding and for no other purpose, and such documents and information shall be maintained in secure files, separate from public information, until returned to the producing party or destroyed pursuant to the terms hereof.

3. With respect to all Confidential Information, it is further ORDERED that:

(a) Access to the documents designated as “Confidential Information,” and to the information contained therein, shall be limited to the parties and their identified attorneys, employees, and consultants whose examination of the Confidential Information is required for the conduct of this proceeding.

(b) Recipients of Confidential Information shall not disclose the contents of the documents produced pursuant to this Protective Order to any person(s) other than their identified employees and any identified witnesses/consultants whom they may retain in connection with this proceeding, irrespective of whether any such expert is retained specially and is not expected to testify, or is called to testify, in this proceeding. All employees (except Bureau of Investigation & Enforcement (BI&E) witnesses who are full-time employees and shall be entitled to receive documents without individually executing a Certification), consultants or experts of any of the parties bound by this Protective Order who are to receive copies of documents or information produced pursuant to this Protective Order shall have executed a copy

of the Certification attached hereto as Appendix A, which executed Certification shall be forthwith provided to counsel for the producing party with copies to counsel for other parties. The BI&E Prosecutors who enter an appearance in this proceeding shall represent that all BI&E witnesses/employees will be bound by this Protective Order.

(c) No other disclosure of Confidential Information shall be made to any person or entity except with the express written consent of the producing party or upon further order of the Commission or of any Court of competent jurisdiction which may review these matters.

4. The acceptance by the parties of documents or information which has been identified and marked as Confidential Information shall not serve to create a presumption that the material is in fact entitled to any special status in these or any other proceedings. Accordingly, as provided in 52 Pa. Code § 5.423, a party receiving Confidential Information retains the right, either before or after receipt of such Confidential Information, to challenge the legitimacy of the claim that the information is proprietary. Any party may initiate such a challenge by notifying the Commission, with reasonable notice to all other parties, that it wishes to challenge the designation of the material as Confidential Information. In that event, the producing party, as the provider of the Confidential Information, shall have the burden of proving that the material is entitled to protected status. However, notwithstanding such challenge, all parties shall continue to treat the documents and information subject to challenge as Confidential Information in accordance with the terms of this Protective Order, pending resolution by the Commission of the dispute as to its status.

5. The producing party retains the right to seek restrictions on the production, distribution and use by other parties of the Confidential Information beyond the protection expressly afforded such Confidential Information by this Protective Order.

6. This Protective Order shall not operate as a determination, for any purpose, that any documents or information produced pursuant to this Protective Order are either admissible or inadmissible in these or any other proceedings.

7. Documents or other materials containing Confidential Information filed with the Commission in this proceeding, including but not limited to pre-filed testimony and pre-filed exhibits, shall be labeled "CONFIDENTIAL" and shall be deemed filed under seal. During evidentiary hearings, if any, in this proceeding, all persons present for such hearings shall be subject to the terms of this Protective Order and may be required to so affirm for purposes of the record. The portion of the record containing the Confidential Information, including the portions of transcripts of oral testimony discussing Confidential Information, shall be placed under seal.

8. The Commission and any other state agency that may have access to, or receive copies of, the Confidential Information will deem and treat such information as within the exemption from disclosure provided in the Pennsylvania Right-to-Know Act set forth in 65 P.S. § 67.708(b) until such time as the information may be found to be non-proprietary by the Commission or by a court of competent jurisdiction.

9. Confidential Information which is placed on the record of this proceeding under seal shall remain with the Commission under seal after the conclusion of the proceeding. If such Confidential Information is provided to appellate courts for the purposes of appeal(s) from this proceeding, such information shall be provided, and shall remain, under seal.

10. Upon the final resolution of proceedings in which Confidential Information has been provided, which includes the exhaustion of appeals, if any, all documents and other materials containing Confidential Information shall, within thirty days of the producing party's request, be either: (1) returned to counsel for the producing party; or (2) destroyed. If a receiving party chooses to destroy the Confidential Information, then it shall, in the case of the BI&E, notify the producing party, and, in the case of all other parties, certify to the producing party, that the Confidential Information has been destroyed by it and its employees, consultants, and other representatives, and that the terms of this Protective Order have been satisfied. Provided, however, that the BI&E, the OCA, and the Office of Small Business Advocate may maintain in their official files copies of all pleadings, briefs, statements, exhibits and transcripts in this proceeding and, further provided, that all such pleadings, briefs, statements, exhibits and transcripts containing Confidential Information shall remain subject to the terms of this Protective Order.

11. A single copy of documents returned to the producing party or certified as destroyed upon resolution of this proceeding, as provided in this Protective Order, shall be kept on file at the producing party's offices for two years after the final resolution of this proceeding, as defined previously, for review by the parties under the terms of this Protective Order upon at least twenty days' notice to counsel for the producing party.

12. The issuance of this Protective Order shall not prejudice the producing party's right to challenge the production of any documents or information sought in discovery by any party on the grounds that such documents or information are not properly discoverable.

IT IS HEREBY ORDERED:

Dated: _____, 2019

Administrative Law Judge Marta Guhl

APPENDIX A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

OFFICE OF CONSUMER ADVOCATE :
 :
 v. : **Docket Nos. M-2018-3005860**
 : **C-2018-3006242**
PECO ENERGY COMPANY :

TO WHOM IT MAY CONCERN:

The undersigned is the _____ of _____
(the receiving party).

The undersigned has read, and understands that, the Protective Order deals with the treatment of Confidential Information. The undersigned agrees to be bound by, and comply with, the terms and conditions of said Protective Order, which are incorporated herein by reference.

SIGNATURE

PRINT NAME

ADDRESS

EMPLOYER

DATE: _____

APPENDIX B

PROPOSED DISCOVERY MODIFICATIONS

PENNSYLVANIA PUBLIC UTILITY COMMISSION

OFFICE OF CONSUMER ADVOCATE :
: **Docket Nos. M-2018-3005860**
v. : **C-2018-3006242**
: **PECO ENERGY COMPANY** :

**PECO ENERGY COMPANY'S
PROPOSED DISCOVERY PROCEDURE MODIFICATIONS**

1. From and after the date of service of the OCA's direct testimony in this proceeding, answers to written interrogatories are to be served in-hand within ten (10) calendar days of service of the interrogatories.
2. From and after the date of service of the OCA's direct testimony in this proceeding, responses to requests for documents production, entry for inspection, or other purposes are to be served in-hand within ten (10) calendar days of service.
3. From and after the date of service of PECO's rebuttal testimony in this proceeding, answers to written interrogatories are to be served in-hand within seven (7) calendar days of service of the interrogatories.
4. From and after the date of service of the PECO's rebuttal testimony in this proceeding, responses to requests for documents production, entry for inspection, or other purposes are to be served in-hand within seven (7) calendar days of service.
5. Discovery requests served after 4:30 p.m. Monday through Thursday or after 12:00 p.m. on a Friday or the day preceding a holiday shall be deemed to have been served on the next business day.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

OFFICE OF CONSUMER ADVOCATE	:	
	:	
v.	:	DOCKET NOS. M-2018-3005860
	:	C-2018-3006242
PECO ENERGY COMPANY	:	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of **PECO Energy Company's Prehearing Conference Memorandum** in the above-referenced matter on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

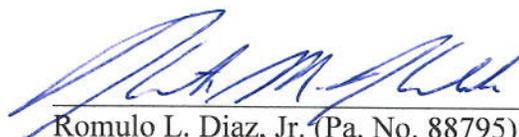
VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

The Honorable Marta Guhl
Administrative Law Judge
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Dated: April 23, 2019

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