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Respond Power, LLC V. PN/WPP Proceeding  
Response to Respond Power LLC Interrogatory Set VI, No. 1  
Witness: K. L. Bortz  
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**RESPOND POWER LLC V. PENNSYLVANIA ELECTRIC COMPANY  
RESPOND POWER LLC V. WEST PENN POWER COMPANY  
Docket Nos. C-2016-2576287, C-2016-2576292**

**Respond Power LLC, Set VI, No. 1**

“Reference Response to Respond Power LLC Interrogatory Set V, No. 20, Confidential Attachment A.

- (a) Please indicate whether the column showing the balance due at time Respond Power began serving the customer reflects only past due balances. If this column also reflects current balances due to the Companies at the time Respond Power began serving the customer, please provide the current balances that were due to the Companies at that time for each customer.
- (b) Please explain what is meant by the balance being provided “for each time slice the customer was served.” For instance, does this mean that a customer was served on different occasions by Respond Power, and possibly returned to default service or selected a different electric generation supplier between those time periods?
- (c) Comparing the information provided in this response to the information provided in response to Respond Power LLC Interrogatory Set I, No.5, Confidential Attachment A, the account numbers are set forth in a different order. It appears that the information provided in response to Respond Power LLC Interrogatory Set I, No. 5, Confidential Attachment A is set forth in the order in which the write-offs occurred. If possible, please produce the information that is provided by Respond Power LLC Interrogatory Set V, No. 20, Confidential Attachment A in the same order as the information that is provided in Respond Power LLC Interrogatory Set I, No. 5, Confidential Attachment A. Alternatively, if this is not possible, please indicate the order in which the information is set forth in response to Respond Power LLC Interrogatory Set V, No. 20, Confidential Attachment A and explain how comparisons can be made readily between balances due and amounts that were written-off.”

**RESPONSE:**

- (a) The column showing the “Balance Due At Time Respond Power Began Serving Customer” reflects only past due balances.
- (b) A customer may have been served by Respond Power on different occasions for

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 Harrisburg JS

specific time periods. The "Balance Due At Time Respond Power Began Serving Customer" does not include any Respond Power past due charges for those customers that were only served by Respond Power for one time period. However, the balance due may include Respond Power past due charges for those customers served multiple times by Respond Power.

- (c) See Respond Power LLC Interrogatory Set VI, No. 1, CONFIDENTIAL Attachment A for the requested format.