



November 13, 2020

Anthony Gay, Esq.  
Jack R. Garfinkle, Esq.  
Jennedy Johnson, Esq.  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101

**Re: TURN v. PECO Energy Company, Docket No. C-2020-3021557**

Dear Counsel:

Enclosed please find the Interrogatories, Set III, of the Tenant Union Representative Network (TURN) to PECO Energy Company in the above referenced proceeding.

Pursuant to the discovery rules at 52 Pa. Code § 5.342, verified answers to these inquiries are due within twenty (20) days of service.

Copies of these Interrogatories are being served upon all parties, as indicated on the attached Certificate of Service. Additionally, this Certificate of Service has been electronically filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission.

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

Sincerely,

Joline R. Price, Esquire  
Attorney ID No. 315405

*Enclosures*

Cc: PA PUC Secretary's Bureau (Cover Letter and Certificate of Service only)  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Tenant Union Representative Network	:	
Complainant	:	
v.	:	Docket No. C-2020-3021557
PECO Energy Company	:	
Respondent	:	

**Certificate of Service**

I hereby certify that I have this day served copies of the Interrogatories and Requests for Admission of the Tenant Union Representative Network (TURN) to PECO Energy Company, Set III, upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code §1.54 in the manner and upon the persons listed below.

**VIA ELECTRONIC MAIL**

Anthony E. Gay, Esq.  
Jack R. Garfinkle, Esq.  
Jennedy Johnson, Esq.  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101  
[Anthony.gay@exeloncorp.com](mailto:Anthony.gay@exeloncorp.com)  
[Jack.garfinkle@exeloncorp.com](mailto:Jack.garfinkle@exeloncorp.com)  
[Jennedy.johnson@exeloncorp.com](mailto:Jennedy.johnson@exeloncorp.com)

Kenneth M. Kulak, Esq.  
Catherine G. Vasudevan, Esq.  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103  
[Ken.kulak@morganlewis.com](mailto:Ken.kulak@morganlewis.com)  
[Catherine.vasudevan@morganlewis.com](mailto:Catherine.vasudevan@morganlewis.com)

Elizabeth R. Marx, Esq.  
John W. Sweet, Esq.  
Ria M. Pereira, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

Christy M. Appleby, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[Cappleby@paoca.org](mailto:Cappleby@paoca.org)



---

Joline R. Price, Esquire (PA ID: 315405)  
*Counsel for TURN*  
COMMUNITY LEGAL SERVICES, INC.  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
(215) 981-3756

November 13, 2020