



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166
Tel: 717.232.8000 • Fax: 717.237.5300

Charis Mincavage
Direct Dial: 717.237.5437
Direct Fax: 717.260.1725
cmincavage@mcneeslaw.com

January 22, 2021

VIA EMAIL

Jack R. Garfinkle, Esq.
Anthony E. Gay, Esq.
PECO Energy Company
2301 Market Street / S23-1
Philadelphia, PA 19101-8699

Kenneth M. Kulak, Esq.
Catherine G. Vasudevan, Esq.
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921

RE: Petition of PECO Energy Company For Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan; Docket No. M-2020-3020830

Dear Counsel:


Attached please find the Philadelphia Area Industrial Energy Users Group ("PAIEUG") Interrogatories to PECO, Set I, in the above-referenced proceeding.

Please provide responses within the required timeframe. Please also endeavor to forward responses in an organized manner as they are completed; it is not necessary to await completion of all responses prior to forwarding those completed more quickly.

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to these proceedings are being duly served via email only due to the current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this pleading upon request.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Charis Mincavage

Counsel to the Philadelphia Area Industrial Energy Users Group

Enclosures

c: Rosemary Chiavetta, Secretary (via electronic filing, letter and certificate only)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA E-MAIL

Jack R. Garfinkle, Esq.
Anthony E. Gay, Esq.
PECO Energy Company
2301 Market Street / S23-1
Philadelphia, PA 19101-8699
jack.garfinkle@exeloncorp.com
anthony.gay@exeloncorp.com

Kenneth M. Kulak, Esq.
Catherine G. Vasudevan, Esq.
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
ken.kulak@morganlewis.com
cvasudevan@morganlewis.com

John Sweet, Esq.
Elizabeth R. Marx, Esq.
Ria Pereira, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
jsweetpulp@palegalaid.net
emarxpulp@palegalaid.net
rpereirapulp@palegalaid.net

Steven C. Gray, Esq.
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
sgray@pa.gov

Mark C. Szybist, Esq.
1152 15th Street, NW, Suite 300
Washington, DC 20005
mszybist@nrdc.org

James M. Von Nostrand, Esq.
Keyes & Fox LLP
320 Fort Duquesne Boulevard, Suite 15K
Pittsburgh, PA 15222
jvannostrand@keyesfox.com

Laura J. Antinucci, Esq.
Aron J. Beatty, Esq.
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
lantinucci@paoca.org
abeatty@paoca.org

Derrick Price Williamson, Esq.
Barry A. Naum, Esq.
Spilman Thomas & Battle PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

Kinteshia A. Scott, Esq.
Joline Price, Esq.
Robert W. Ballenger, Esq.
Josie B.H. Pickens, Esq.
Community Legal Services
1424 Chestnut Street
Philadelphia, PA 19102
kscott@clsphila.org
jprice@clsphila.org
rballenger@clsphila.org
jpickens@clsphila.org



Chris Mincavage

Counsel to the Philadelphia Area Industrial Energy
Users Group

Dated this 22nd day of January, 2021, at Harrisburg, Pennsylvania