



COMMONWEALTH OF PENNSYLVANIA

January 25, 2022

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

Tori L. Giesler, Esq.  
FirstEnergy  
2800 Pottsville Pike  
PO Box 16001  
Reading, PA 19612-6001

**Re: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company, for Approval of Their Default Service Programs; Docket Nos. P-2021-3030012; P-2021-3030013; P-2021-3030014; and P-2021-3030021**

Dear Counsel:

Enclosed please find the Interrogatories (Set I) of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceedings.

We respectfully request that you provide verified answers to these inquiries within twenty (20) days of service. Additionally, please serve one copy on OSBA’s consultant, Mr. Robert D. Knecht, as indicated below:

Mr. Robert D. Knecht  
Industrial Economics, Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
Phone 617-354-0074  
Fax 617-3540463  
[rdk@indecon.com](mailto:rdk@indecon.com)

Copies of these interrogatories will be 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, as required by 52 Pa. Code § 5.341(b).

As always, please feel free to contact me directly with any questions or comments.

Sincerely,

/s/ Erin K. Fure

Erin K. Fure  
Assistant Small Business Advocate  
Attorney ID No. 312245

*Enclosures*

cc: PA PUC Rosemary Chiavetta (Cover Letter and Certificate of Service ONLY)  
Mr. Robert Knecht  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>JOINT PETITION OF METROPOLITAN</b>	:	
<b>EDISON COMPANY, PENNSYLVANIA</b>	:	
<b>ELECTRIC COMPANY, PENNSYLVANIA</b>	:	<b>DOCKET NOS. P-2021-3030012</b>
<b>POWER COMPANY AND WEST PENN</b>	:	<b>P-2021-3030013</b>
<b>POWER COMPANY FOR APPROVAL OF</b>	:	<b>P-2021-3030014</b>
<b>THEIR DEFAULT SERVICE PROGRAMS</b>	:	<b>P-2021-3030021</b>
	:	
	:	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Tori L. Giesler, Esq.  
FirstEnergy  
2800 Pottsville Pike  
PO Box 16001  
Reading, PA 19612-6001  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

Brooke E. McGlinn, Esq.  
Catherine G. Vasudevan, Esq.  
Kenneth M. Kulak, Esq.  
Morgan Lewis and Bockius LLP  
1701 Market Street  
Philadelphia, AP 19103  
[bmcglinn@morganlewis.com](mailto:bmcglinn@morganlewis.com)  
[cvasudevan@morganlewis.com](mailto:cvasudevan@morganlewis.com)  
[kkulak@morganlewis.com](mailto:kkulak@morganlewis.com)

Allison C. Kaster, Esq.  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Elizabeth R. Marx, Esq.  
John Sweet, Esq.  
Lauren Berman  
Ria Pereira, Esq.  
PA Utility Law Project  
118 Locust Street  
Harrisburg, PA 1710  
[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)  
[jsweet@pautilitylawproject.org](mailto:jsweet@pautilitylawproject.org)  
[lberman@pautilitylawproject.org](mailto:lberman@pautilitylawproject.org)  
[rpereira@pautilitylawproject.org](mailto:rpereira@pautilitylawproject.org)

Patrick M. Cicero, Esq.  
Christy Appleby, Esq.  
Darryl A. Lawrence, Esq.  
Harrison W. Breitman, Esq.  
Office of Consumer Advocate  
5th Floor Forum Place  
555 Walnut Street  
Harrisburg PA 17101-1923  
[pcicero@paoca.org](mailto:pcicero@paoca.org)  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)  
[hbreitman@paoca.org](mailto:hbreitman@paoca.org)

Christopher O'Hara  
Senior Vice President, General Counsel, Law  
& Chief Compliance Officer  
PJM Interconnection LLC  
2750 Monroe Boulevard  
Audubon, PA 19403-2497  
[christopher.ohara@pjm.com](mailto:christopher.ohara@pjm.com)

Deanne M. O'Dell  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8th Floor  
P.O. Box 1248  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)

Charis Mincavage, Esquire  
Mnees Wallace & Nurick LLC  
100 Pine Street  
Po Box 1166  
Harrisburg, PA 17108  
[cmincavage@mwn.com](mailto:cmincavage@mwn.com)

Michael A. Gruin, Esq.  
Attorney ID No. 78625  
Stevens & Lee  
17 North 2nd Street, 16th Floor  
[michael.gruin@stevenslee.com](mailto:michael.gruin@stevenslee.com)

Colleen Kartychak  
Exelon Corporation  
1310 Point Street  
Baltimore, MD 21231  
[Colleen.kartychak@exeloncorp.com](mailto:Colleen.kartychak@exeloncorp.com)  
[john.white@exeloncorp.com](mailto:john.white@exeloncorp.com)

Thomas J. Sniscak, Esquire  
Whitney E. Snyder, Esquire  
Phillip D. Demanchick, Jr., Esquire  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)  
[pddemanchick@hmslegal.com](mailto:pddemanchick@hmslegal.com)

Deanne M. O'Dell, Esquire  
Karen O. Moury, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
P.O. Box 1248  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)

John F. Lushis, Jr  
David Berger  
NORRIS McLAUGHLIN, P.A.  
515 W. Hamilton Street,| Suite 502  
Allentown, PA 1810  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)  
[dberger@norris-law.com](mailto:dberger@norris-law.com)

/s/ Erin K. Fure

---

Erin K. Fure  
Assistant Small Business Advocate  
Attorney ID # 312245

Dated: January 25, 2022