



COMMONWEALTH OF PENNSYLVANIA

March 24, 2022

The Honorable Jeffrey A. Watson  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Piatt Place  
301 5<sup>th</sup> Avenue, Suite 220  
Pittsburgh, PA 15222

**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 Judge Watson:

Enclosed please find the Rebuttal Testimony of Robert D. Knecht, labeled OSBA Statement No. 1-R, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceedings.

As evidenced by the enclosed Certificate of Service, all known parties will be served, as indicated.

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

Sincerely,

/s/ Erin K. Fure

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

*Enclosures*

cc: PA PUC Secretary Rosemary Chiavetta (Cover Letter & Certificate of Service only)  
Robert D. 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 17110  
[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  
[Ocafedsp2021@paoca.org](mailto:Ocafedsp2021@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  
Karen O. Moury  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8th Floor  
P.O. Box 1248  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)

Todd S. Stewart  
Hawke McKeon & Sniscak LLP  
100 North 10th Street  
P.O. Box 1778  
Harrisburg, PA 17105  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

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

Michael A. Gruin  
Stevens & Lee  
17 North 2nd Street, 16th Floor  
Harrisburg, PA 17101  
[michael.gruin@stevenslee.com](mailto:michael.gruin@stevenslee.com)

The Honorable Jeffrey A. Watson  
Administrative Law Judge  
Nick Miskanic  
Legal Assistant  
Piatt Place, Suite 220  
201 Fifth Avenue  
Pittsburgh, PA 15222  
[jeffwatson@pa.gov](mailto:jeffwatson@pa.gov)  
[nmiskanic@pa.gov](mailto:nmiskanic@pa.gov)

James L. Crist, P.E.  
Lumen Group, Inc.  
4226 Yarmouth Drive, Suite 101  
Allison Park, PA 15101  
[JLCrist@aol.com](mailto:JLCrist@aol.com)

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

Brian R. Greene  
GreeneHurlocker, PLC Suite  
200 4908 Monument Avenue  
Richmond, VA 23230  
[bgreene@greenehurlocker.com](mailto:bgreene@greenehurlocker.com)

Danny E. Garcia  
Admin Tech I, Rates & Regulatory Affairs – PA  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, PA 19612-6001  
Phone: (610) 921-6352  
[degarcia@firstenergycorp.com](mailto:degarcia@firstenergycorp.com)

David Berger  
Norris McLaughlin, P.A.  
515 West Hamilton Street, Suite 502  
Allentown, PA 18101  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)  
[dberger@norris-law.com](mailto:dberger@norris-law.com)

A. Michael Gianantonio  
Robert F. Daley  
Robert Peirce & Associates, P.C.  
707 Grant Street  
Gulf Tower, Suite 125  
Pittsburgh, PA 15219  
[mgianantonio@peircelaw.com](mailto:mgianantonio@peircelaw.com)

/s/ Erin K. Fure

---

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

Dated: March 24, 2022