

Robert N. Peirce, Jr.  
Robert N. Peirce, III (KY, OH, WV)  
Robert F. Daley (OH, WV)  
D. Aaron Rihn (WV)  
Elizabeth A. Chiappetta (WV)  
Scott M. Simon  
Mark D. Troyan (WV)  
Joseph Bellissimo  
A. Michael Gianantonio  
Adrian J. DeGori  
Katelyn Dornburg Edwards (WV)  
Margaret M. Cooney  
Allison H. Greene  
Adam P. Murdock  
Sara J. Watkins  
Zachary Carls  
David Martin

# Robert Peirce & Associates, P.C.

A T T O R N E Y S A T L A W

707 Grant Street • Suite 125 • Pittsburgh, PA 15219-1918  
Telephone: 412-281-7229 • Telefax: 412-281-4229 • Toll Free: 1-800-543-9859

March 30, 2022

## VIA ELECTRONIC FILING

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, Esquire  
Darshana Singh, Esquire  
FirstEnergy Service Company  
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:

Attached, please find the Discovery Requests of John Bevec and Sunrise Energy, LLC (Sets III and IV). In accordance with the Commission's Rules of Practice and Procedure, please serve your verified responses within ten days of service.

Thank you for your attention to this matter.

Respectfully,

  
A. MICHAEL GIANANTONIO

/sjp  
Attachment

cc: Secretary Rosemary Chiavetta (Letter and Certificate of Service Only)  
All Counsel of Record

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

### Via Email Only:

Kenneth M. Kulak, Esquire  
Catherine G. Vasudevan, Esquire  
Brooke E. McGlinn, Esquire  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
[Ken.kulak@morganlewis.com](mailto:Ken.kulak@morganlewis.com)  
[Catherine.vasudevan@morganlewis.com](mailto:Catherine.vasudevan@morganlewis.com)  
[Brooke.mcglinn@morganlewis.com](mailto:Brooke.mcglinn@morganlewis.com)

Allison C. Kaster, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Tori L. Giesler, Esquire  
Darshana Singh, Esquire  
FirstEnergy Service Company  
2800 Pottsville Pike  
PO Box 16001  
Reading, PA 19612-6001  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)  
[singhd@firstenergycorp.com](mailto:singhd@firstenergycorp.com)

Susan E. Bruce, Esquire  
Charis Mincavage, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108  
[sbruce@mcneeslaw.com](mailto:sbruce@mcneeslaw.com)  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)

Patrick M. Cicero, Esquire  
Darryl A. Lawrence, Esquire  
Christy M. Appleby, Esquire  
Harrison W. Breitman, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
[OCAFEDSP2021@paoca.org](mailto:OCAFEDSP2021@paoca.org)

Elizabeth R. Marx, Esquire  
Lauren N. Berman, Esquire  
Ria M. Pereira, Esquire  
John W. Sweet, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

Erin K. Fure, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor, Forum Place  
Harrisburg, PA 17101  
[efure@pa.gov](mailto:efure@pa.gov)

Todd S. Stewart, Esquire  
Hawke McKeon & Sniscak, LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.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)

John F. Lushis, Jr., Esquire  
David Berger, Esquire  
Norris McLaughlin, P.A.  
515 W. 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)

Robert D. Knecht  
Industrial Economics, Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)

Serhan Ogur  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway, Suite 300  
Columbia, MD 21044  
[sogur@exeterassociates.com](mailto:sogur@exeterassociates.com)

Colleen P. Kartychak, Esquire  
John White, Esquire  
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)

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

James Laskey, Esquire  
Norris McLaughlin, P.A.  
400 Crossing Blvd., 8th Floor  
Bridgewater, PA 08807  
[jaskey@norris-law.com](mailto:jaskey@norris-law.com)

Barbara R. Alexander  
Barbara Alexander Consulting, LLC  
83 Wedgewood Drive  
Winthrop, ME 04364  
[barbalexand@gmail.com](mailto:barbalexand@gmail.com)

Dated: 3/30/22

By: 

A. MICHAEL GIANANTONIO, ESQUIRE  
Counsel for Petitioners John Bevec and Sunrise  
Energy, LLC

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

### Via Email Only:

Kenneth M. Kulak, Esquire  
Catherine G. Vasudevan, Esquire  
Brooke E. McGlinn, Esquire  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
[Ken.kulak@morganlewis.com](mailto:Ken.kulak@morganlewis.com)  
[Catherine.vasudevan@morganlewis.com](mailto:Catherine.vasudevan@morganlewis.com)  
[Brooke.mcglinn@morganlewis.com](mailto:Brooke.mcglinn@morganlewis.com)

Tori L. Giesler, Esquire  
Darshana Singh, Esquire  
FirstEnergy Service Company  
2800 Pottsville Pike  
PO Box 16001  
Reading, PA 19612-6001  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)  
[singhd@firstenergycorp.com](mailto:singhd@firstenergycorp.com)

Patrick M. Cicero, Esquire  
Darryl A. Lawrence, Esquire  
Christy M. Appleby, Esquire  
Harrison W. Breitman, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
[OCAFEDSP2021@paoca.org](mailto:OCAFEDSP2021@paoca.org)

Erin K. Fure, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor, Forum Place  
Harrisburg, PA 17101  
[efure@pa.gov](mailto:efure@pa.gov)

Allison C. Kaster, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Susan E. Bruce, Esquire  
Charis Mincavage, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108  
[sbruce@mcneeslaw.com](mailto:sbruce@mcneeslaw.com)  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)

Elizabeth R. Marx, Esquire  
Lauren N. Berman, Esquire  
Ria M. Pereira, Esquire  
John W. Sweet, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

Todd S. Stewart, Esquire  
Hawke McKeon & Sniscak, LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.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)

John F. Lushis, Jr., Esquire  
David Berger, Esquire  
Norris McLaughlin, P.A.  
515 W. 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)

Robert D. Knecht  
Industrial Economics, Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)

Serhan Ogur  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway, Suite 300  
Columbia, MD 21044  
[sogur@exeterassociates.com](mailto:sogur@exeterassociates.com)


Colleen P. Kartychak, Esquire  
John White, Esquire  
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)

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

James Laskey, Esquire  
Norris McLaughlin, P.A.  
400 Crossing Blvd., 8th Floor  
Bridgewater, PA 08807  
[jlasky@norris-law.com](mailto:jlasky@norris-law.com)

Barbara R. Alexander  
Barbara Alexander Consulting, LLC  
83 Wedgewood Drive  
Winthrop, ME 04364  
[barbalexand@gmail.com](mailto:barbalexand@gmail.com)

Dated: 3/30/22

By:   
A. MICHAEL GIANANTONIO, ESQUIRE  
Counsel for Petitioners John Bevec and Sunrise  
Energy, LLC