

# Morgan Lewis

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August 11, 2022

## **VIA eFILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v.  
PECO Energy Company – Gas Division  
Docket No. R-2022-3031113**

Dear Secretary Chiavetta:

Enclosed for filing in the above-captioned proceedings is the **Joint Stipulation for Admission of Testimony and Exhibits** ("Joint Stipulation"). The Joint Stipulation will be served on presiding Administrative Law Judge F. Joseph Brady, and all parties of record as indicated on the Certificate of Service.

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

Very truly yours,



Kenneth M. Kulak

KMK/tp  
Enclosures

c: Per Certificate of Service (w/encls.)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY  
COMMISSION**

v.

**PECO ENERGY COMPANY –  
GAS DIVISION**

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**DOCKET NO. R-2022-3031113**

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of the **Joint Stipulation for Admission of Testimony and Exhibits** on the persons listed below in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA ELECTRONIC MAIL**

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Dated: August 11, 2022

*Counsel for PECO Energy Company*

DB1/ 132189232.1

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION</b>	:	
	:	
v.	:	<b>DOCKET NO. R-2022-3031113</b>
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<b>PECO ENERGY COMPANY – GAS DIVISION</b>	:	
	:	

**JOINT STIPULATION  
FOR ADMISSION OF TESTIMONY AND EXHIBITS**

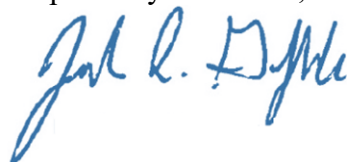
The undersigned, being all of the parties to this proceeding: (1) stipulate the authenticity of the statements and exhibits listed in Attachment 1 to this Stipulation (the “Listed Statements and Exhibits”), which were previously served upon all parties in this proceeding and upon presiding Administrative Law Judge F. Joseph Brady; (2) acknowledge and agree that they waive cross-examination of the witnesses whose testimony is included in the Listed Statements and Exhibits<sup>1</sup>; and (3) further stipulate that the Listed Statements and Exhibits should be admitted into the record in this case.

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<sup>1</sup> Cross-examination has not been waived with regard to any oral rejoinder that may be provided at hearings.

Stipulated and agreed this 11th day of August, 2022.

Respectfully submitted,



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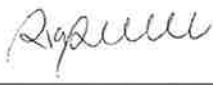
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**BEFORE THE  
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**PECO ENERGY COMPANY –  
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**DOCKET NO. R-2022-3031113**

**ATTACHMENT 1**

**TO**

**JOINT STIPULATION FOR ADMISSION OF  
TESTIMONY AND EXHIBITS**

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**DOCKET NO. R-2022-3031113**

**PECO ENERGY COMPANY**

<b>Document Identifier</b>	<b>Document Description</b>
PECO Statement No. 1:	Direct Testimony of Ronald A. Bradley (Public & Confidential Versions)
• PECO Exhibit RAB-1:	Number of Incoming Leak Tickets for Grade 1, 2A and 2B Leaks – 2015-2021
• PECO Exhibit RAB-2:	Percent of First Responder Calls Responded to in 1 Hour or Less
PECO Statement No. 1-R:	Rebuttal Testimony of Ronald A. Bradley (Public & Confidential Versions)
• PECO Exhibit RAB-3 Confidential:	Revised Confidential Attachment IE-GS-18(a)
• PECO Exhibit RAB-4 Confidential:	Revised Confidential Attachment IE-GS-3(b)
• PECO Exhibit RAB-5:	Total Damages due to Mapping Errors and Poor Records
PECO Statement No. 2:	Direct Testimony of Robert J. Stefani
• PECO Exhibit RJS-1:	Business Services Company Operations & Maintenance Costs
PECO Statement No. 2-R:	Rebuttal Testimony of Robert J. Stefani
• PECO Exhibit RJS-1:	Segal Medical Trend Projections, 2020

<ul style="list-style-type: none"> <li>• PECO Exhibit RJS-2:</li> </ul>	Willis Towers Watson Health Care Costs Trend, 2021
<ul style="list-style-type: none"> <li>• PECO Exhibit RJS-3:</li> </ul>	Research and Development Program Details
PECO Statement No. 3:	Direct Testimony of Michael J. Trzaska
<ul style="list-style-type: none"> <li>• PECO Exhibit MJT-1:</li> </ul>	Principal Accounting Exhibit - Fully Projected Future Test Year ended December 31, 2023
<ul style="list-style-type: none"> <li>• PECO Exhibit MJT-2:</li> </ul>	Principal Accounting Exhibit - Future Test Year ending December 31, 2022
<ul style="list-style-type: none"> <li>• PECO Exhibit MJT-3:</li> </ul>	Principal Accounting Exhibit - Historic Test Year ended December 31, 2021
PECO Statement No. 3-R:	Rebuttal Testimony of Michael J. Trzaska
<ul style="list-style-type: none"> <li>• PECO Exhibit MJT-1 Revised:</li> </ul>	Principal Accounting Exhibit - Fully Projected Future Test Year ended December 31, 2023
PECO Statement No. 4:	Direct Testimony of Caroline Fulginiti
<ul style="list-style-type: none"> <li>• PECO Exhibit CF-1:</li> </ul>	Annual Depreciation Accruals Related to Utility Plant in Service for 2021
<ul style="list-style-type: none"> <li>• PECO Exhibit CF-2:</li> </ul>	Estimated Annual Depreciation Accruals Related to Utility Plant in Service for 2022
<ul style="list-style-type: none"> <li>• PECO Exhibit CF-3:</li> </ul>	Estimated Annual Depreciation Accruals Related to Utility Plant in Service for 2023
<ul style="list-style-type: none"> <li>• PECO Exhibit CF-4:</li> </ul>	2018 Depreciation Study – Calculated Annual Depreciation Accruals Related to Gas Plant as of December 31, 2018
PECO Statement No. 5:	Direct Testimony of Paul R. Moul
<ul style="list-style-type: none"> <li>• PECO Exhibit PRM-1:</li> </ul>	Cost of Capital and Fair Rate of Return
PECO Statement No. 5-R:	Rebuttal Testimony of Paul R. Moul
<ul style="list-style-type: none"> <li>• PECO Exhibit PRM-2:</li> </ul>	Calculation of the Embedded Cost of Long-Term Debt - Actual at December 31, 2021



<ul style="list-style-type: none"> <li>• PECO Exhibit PRM-3:</li> </ul>	DCF Results
PECO Statement No. 6:	Direct Testimony of Jiang Ding
<ul style="list-style-type: none"> <li>• PECO Exhibit JD-1:</li> </ul>	Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Summary of Results
<ul style="list-style-type: none"> <li>• PECO Exhibit JD-2:</li> </ul>	Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Allocation By Rate Class
<ul style="list-style-type: none"> <li>• PECO Exhibit JD-3:</li> </ul>	Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Allocation By Functional Classification
<ul style="list-style-type: none"> <li>• PECO Exhibit JD-4:</li> </ul>	Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Unitized Functionally Classified Revenue Requirement
<ul style="list-style-type: none"> <li>• PECO Exhibit JD-5:</li> </ul>	Customer-Related Revenue Requirement and Customer Charge
<ul style="list-style-type: none"> <li>• PECO Exhibit JD-6:</li> </ul>	FPFTY 2023 - Cost of Service Study - External Allocation Factors
<ul style="list-style-type: none"> <li>• PECO Exhibit JD-7:</li> </ul>	Derivation of Peak Day Demand (NARUC Manual, p. 48)
PECO Statement No. 6-R:	Rebuttal Testimony of Jiang Ding
<ul style="list-style-type: none"> <li>• PECO Exhibit JD-1R:</li> </ul>	Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Summary of Results
<ul style="list-style-type: none"> <li>• PECO Exhibit JD-2R:</li> </ul>	Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Allocation by Rate Class
<ul style="list-style-type: none"> <li>• PECO Exhibit JD-3R:</li> </ul>	Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Allocation by Functional Classification
<ul style="list-style-type: none"> <li>• PECO Exhibit JD-4R:</li> </ul>	Gas Class Cost of Service Study for FPFTY Ended December 31, 2023 - Unitized Functionally Classified Revenue Requirement

- PECO Exhibit JD-5R: Customer-Related Revenue Requirement and Customer Charge Costs
  - PECO Exhibit JD-6R: FPFTY 2023 - Cost of Service Study - External Allocation Factors
  - PECO Exhibit JD-7R: Confidential: PECO GCOS Model\_Rebuttal
  - PECO Exhibit JD-8R: Response to Interrogatory PECO-OSBA-II-1
  - PECO Exhibit JD-9R: Actual Usage by Rate Class by Month from 2017 to 2021
  - PECO Exhibit JD-10R: PAIEUG Statement No. 1, Page 6, Table 1, TS-F Peak Day Throughput and the Sum of the Daily TCQ (Mcf)
  - PECO Exhibit JD-11R: Response to Interrogatory OCA-III-7
  - PECO Exhibit JD-12R: PECO's 1307(f) Filing, Section 15
  - PECO Exhibit JD-13R: TSF TCQ as of December 2020 (Mcf)
- PECO Statement No. 7:
- PECO Exhibit JAB-1: Proposed Revenue Allocation, and Rates of Return by Rate Class
  - PECO Exhibit JAB-2: Relevant Gas Service Tariff Pages (Redline to Show Changes)
  - PECO Exhibit JAB-3: Comparison of Residential Customer Charges for Pennsylvania Natural Gas Distribution Utilities
  - PECO Exhibit JAB-4: Proof of Revenues at Present and Proposed Rates – Residential (GR)
- PECO Statement No. 7-R:
- PECO Exhibit JAB-1 Revised: Proposed Revenue Allocation, and Rates of Return by Rate Class

• PECO Exhibit JAB-4 Revised:	Proof of Revenues at Present and Proposed Rates – Residential (GR)
• PECO Exhibit JAB-5:	Response to Interrogatory PECO-OCA-I-9
• PECO Exhibit JAB-6:	Response to Interrogatory PECO-OCA-I-11
• PECO Exhibit JAB-7:	Response to Interrogatory PECO-OCA-I-12
• PECO Exhibit JAB-8:	Response to Interrogatory PECO-OCA-I-10
• PECO Exhibit JAB-9:	Response to Interrogatory PECO-OSBA-IV-1
PECO Statement No. 8:	Direct Testimony of Benjamin S. Yin
• PECO Exhibit BSY-1:	Calculation of Theft Investigation Fee
• PECO Exhibit BSY-2:	Calculation of the Gas Procurement Charge (“GPC”)
• PECO Exhibit BSY-3:	Components and Calculation of the Merchant Function Charge (“MFC”)
• PECO Exhibit BSY-4:	Relevant Gas Supplier Coordination Tariff Pages (Including a Blackline to Show Proposed Changes)
PECO Statement No. 8-R:	Rebuttal Testimony of Benjamin S. Yin
• PECO Exhibit BSY-2R:	Annual Gas Procurement Charge (GPC) Calculation Effective January 1, 2023
• PECO Exhibit BSY-5:	Response to Interrogatory PECO-OCA-II-1
PECO Statement No. 9:	Direct Testimony Doreen L. Masalta
• PECO Exhibit DLM-1:	PECO Gas Utility EE&C Benchmarking
• PECO Exhibit DLM-2:	2021-2027 Breakdown of Participation, Savings and Spending
• PECO Exhibit DLM-3:	Program Year 2023 Forecast

PECO Statement No. 9-R:

- PECO Exhibit DLM-4:

PECO Statement No. 10:

PECO Statement No. 10-R:

PECO Witness Verifications

Rebuttal Testimony of Doreen L. Masalta

Response to Interrogatory PECO-I&E-I-5

Direct Testimony of Kelly Colarelli

Rebuttal Testimony of Kelly Colarelli

**BUREAU OF INVESTIGATION AND ENFORCEMENT**

Brian LaTorre

I&E Statement No. 1 (PROPRIETARY/Non-Proprietary)

I&E Exhibit No. 1 (PROPRIETARY/Non-Proprietary)

I&E Statement No. 1-R

I&E Exhibit No. 1-R

I&E Statement No. 1-SR

I&E Exhibit No. 1-SR

Anthony Spadaccio

I&E Statement No. 2

I&E Exhibit No. 2

I&E Statement No. 2-SR

Esyan A. Sakaya

I&E Statement No. 3

I&E Exhibit No. 3

I&E Statement No. 3-SR

I&E Exhibit No. 3-SR

Elena Bohzko

I&E Statement No. 4 (PROPRIETARY/Non-Proprietary)

I&E Exhibit No. 4 (PROPRIETARY/Non-Proprietary)

I&E Statement No. 4-SR (PROPRIETARY/Non-Proprietary)

**COALITION FOR AFFORDABLE UTILITY SERVICES AND  
ENERGY EFFICIENCY IN PENNSYLVANIA**

CAUSE-PA Statement 1, the Direct Testimony of Harry S. Geller, Esq.

- 56 pages of Written Testimony
- Appendix A, the Resume of Mr. Harry S. Geller
- Appendix B, Cited Interrogatory Responses
- Witness Verification

CAUSE-PA Statement 1-SR, the Surrebuttal Testimony of Harry S. Geller, Esq.

- 17 pages of Written Testimony
- Witness Verification

## OFFICE OF CONSUMER ADVOCATE

OCA Statement 1, Direct Testimony of Dante Mugrace (CONFIDENTIAL and PUBLIC versions)

- Attachment A (Schedules DM-1 through DM-22)
- Attachment B
- Attachment C

OCA Statement 1SR, Surrebuttal Testimony of Dante Mugrace

- Attachment A (Schedules SR-DM-1 through SR-DM-22)
- Attachment B

OCA Statement 2, Direct Testimony of David J. Garrett

- Appendix A
- Appendix B
- Exhibits DJG-1 through DJF-17

OCA Statement 2SR, Surrebuttal Testimony of David J. Garrett

OCA Statement 3, Direct Testimony of Karl Pavlovic

- Exhibits KRP-1 through KRP-2

OCA Statement 3SR, Surrebuttal Testimony of Karl R. Pavlovic

- Exhibits KRP-SR-1 through KRP-SR-2

OCA Statement 4, Direct Testimony of Roger D. Colton

- Appendix: Colton Abbreviated Vitae

OCA Statement 4R, Rebuttal Testimony of Roger D. Colton

OCA Statement 4SR, Surrebuttal Testimony of Roger D. Colton

## **OFFICE OF SMALL BUSINESS ADVOCATE**

Public and Confidential Versions of Direct Testimony and Exhibits of Robert D. Knecht, labeled OSBA Statement No. 1, with Exhibits RDK-1, RDK-2 and RDK-3

Rebuttal Testimony and Exhibit of Robert D. Knecht, labeled OSBA Statement No. 1-R, with Exhibits RDK-1R and RDK-2R

Surrebuttal Testimony and Exhibits of Robert D. Knecht, labeled OSBA Statement No. 1-S, with Exhibits RDK-1S and RDK-2S



**PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP**

PAIEUG Statement No. 1, Direct Testimony of Billie LaConte, including Exhibits BSL-1 through BSL-11;

PAIEUG Statement No. 1R, Rebuttal Testimony of Billie LaConte, including Exhibits BSL-1R through BSL-2R;

PAIEUG Statement No. 1S, Surrebuttal Testimony of Billie LaConte; and

Verification of Billie LaConte for the aforementioned Direct, Rebuttal, and Surrebuttal Testimonies.