



August 23, 2023

**William Lesser**

Direct Phone 212-453-3808  
Direct Fax 646-588-1450  
wlesser@cozen.com

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

**Re: Petition of PECO Energy Company for Expedited Approval to Extend the Electric Vehicle DCFC Pilot Rider by 18 Months  
Docket No. P-2023-3039439**

Dear Secretary Chiavetta:

This firm represents Electrify America, LLC (“Electrify America”). The purpose of this correspondence is to advise the Pennsylvania Public Utility Commission (“Commission” or “PUC”) that Electrify America withdraws its Petition to Intervene filed April 19, 2023 (“Petition”) in the above-captioned proceeding (a copy of the now-withdrawn Petition is attached hereto as Exhibit A). The basis for Electrify America’s withdrawal is that PECO advised Electrify America that its Petition would result in a contested case, and in order to avoid initiating a contested case, Electrify America is revoking its submission. As stated in the Petition, Electrify America does not protest or otherwise object to an extension of PECO’s DCFC Pilot Rider, and Electrify America never intended to initiate a contested case. Accordingly, and for the avoidance of doubt, Electrify America supports the PUC’s approval of PECO’s Petition to Extend its Electric Vehicle DCFC Pilot Rider by 18 Months.

Electrify America looks forward to continued collaboration and participation with other stakeholders to promote a supportive utility environment for electric vehicle (“EV”) charging in Pennsylvania. Electrify America’s investment in Pennsylvania depends in part on sustainable economics for the private market of EV infrastructure. Utility rates and incentives should be structured to support infrastructure development in order to best align with Commonwealth public policy and ensure the financial sustainability of EV infrastructure operation. Incentivizing EV infrastructure and structuring particular rates for public charging stations are critical steps to allow the Commonwealth to realize its transportation electrification goals.<sup>1</sup>

Traditional demand charges pose a significant barrier to achieving transportation electrification goals. This is because demand charges are often one of the most significant cost

---

<sup>1</sup> See Pennsylvania Department of Environmental Protection, *Electric Vehicles in PA*, available at <https://www.dep.pa.gov/Business/Energy/OfficeofPollutionPrevention/ElectricVehicles/Pages/default.aspx> (stating that the Pennsylvania Department of Environmental Protection “acknowledges the significant role that electric vehicles (EV) will play in Pennsylvania’s transportation future” and finding that “boosting consumer confidence in EVs with a strategic rollout of EV charging stations to meet the projected demand” is vital “to support a regional clean transportation network”).

factors in direct current fast charging (“DCFC”) station operation, determining whether charging companies have the financial capacity to generate a return on investment and open new locations. Demand charges are a critical barrier to the widespread electrification of the transportation sector. These charges, assessed on peak energy consumption during a billing period rather than quantity of electricity used, pose a special economic challenge for high-power, low-utilization uses such as DC fast charging. Demand charge credits have the potential to provide relief to encourage the private market for DCFC stations. Electrify America and some stakeholders have recommended in the Commission’s Policy Statement proceeding, that “the Commission should explicitly address rate design alternatives to demand rates in a policy statement on EV charging rate design.”<sup>2</sup>

*In a separate or future PUC proceeding*, Electrify America would recommend adjustments to PECO’s tariff regarding the demand charge credits offered by PECO through its Pilot Rider. Modifications to the tariff would ensure that PECO’s demand charge credit program fully addresses the barrier that demand charges impose on public DCFC stations. Principally, Electrify America suggests tariff language billing practices that ensure certainty and reduce volatility, as predictable rates and costs for operation allow charging companies to sustainably manage their charging stations.<sup>3</sup> PECO’s discretion to adjust or modify demand credits introduces surprises to charging companies, making it difficult to plan or otherwise anticipate increased costs. As discussed above and in Electrify America’s Petition, the reduction of burdensome demand charges is key to the economic success of the private market of charging companies, and any discretion or alteration of these vital credits has the potential to introduce unwarranted volatility and counterproductive forces to charging companies. Further, PECO bases contract demand provisions on nameplate capacity. Many charging stations are anticipating faster-charging EVs that automakers are bringing to market, in addition to requirements for funding pursuant to the National Electric Vehicle Infrastructure Standards and Requirements (“NEVI”). These high-powered EV charging stations have more limited opportunities to receive demand charge relief if contract demand provisions are based on nameplate capacity. There have also been issues regarding the appropriate Procurement Class assignment and Generation Capacity Tags for Peak Load Contribution (PLC) assigned to new DCFC station accounts. The Procurement Class assignments directly affect whether new stations are able to receive the intended benefits of PECO’s program. Generally speaking, by focusing on actual measured demand, Electrify America would be better positioned to realize the intended benefits of DCFC-specific rates or available demand credits. Ultimately, the goal of Electrify America and other charging companies is to ensure predictable billing practices that reduces volatility from demand charges or unnecessary discretion by the electric distribution companies in administering DCFC-specific programs.

Again, and for the avoidance of doubt, Electrify America withdraws its Petition for the purpose of avoiding the initiation of a contested case. Electrify America agrees that these recommendations and issues identified above should be addressed in a separate PUC proceeding,

---

<sup>2</sup> Pennsylvania Public Utility Commission, *Recommendations of the Electric Vehicle Charging Rate Design Working Group*, Docket No. P-2022-3030743, at p. 17 (March 29, 2023). The Commission has since granted the request to initiate a proceeding that will result in the issuance of a Policy Statement on electric utility rate design for EV charging in Pennsylvania.

<sup>3</sup> PECO’s tariff provides it with discretion to modify demand credits under the DCFC Pilot Rider, which leads to surprise changes and does not afford charging companies the ability to accurately predict operation costs. *See* PECO Tariff PUC No. 7, Original Page 84.

August 23, 2023

Page 3

---

or as part of a Commonwealth-wide proceeding to establish a consistent framework for DCFC rate structures. A strong private market of charging companies will allow the Commonwealth to achieve its transportation electrification policy goals.

Electrify America appreciates the efforts undertaken by the Commission and all involved stakeholders seeking to increase EV and DCFC infrastructure and promote greater EV adoption. Therefore, Electrify America respectfully withdraws its Petition.

Sincerely,

COZEN O'CONNOR



By: William Lesser (PA ID # 332951)

WL

cc: Service List

# EXHIBIT A

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY           :**  
**FOR EXPEDITED APPROVAL TO EXTEND       :**     **Docket No. P-2023-3039439**  
**THE ELECTRIC VEHICLE DCFC PILOT         :**  
**RIDER BY 18 MONTHS                         :**

---

**NOTICE TO PLEAD**

---

You are hereby advised that, pursuant to 52 Pa. Code § 5.66, you may respond to the enclosed Petition to Intervene of Electrify America, LLC within twenty (20) days after the date of service. Your answer should be filed with the Secretary of the Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120. A copy should also be served on the undersigned counsel.

Dated: April 19, 2023

Respectfully submitted,



---

William A. Lesser, Esq. (I.D. # 332951)  
Cozen O'Connor  
3 WTC  
175 Greenwich Street, 55th Floor  
New York, NY 10007  
Telephone: (212) 453-3808  
Facsimile: (646) 588-1450  
E-mail: wlesser@cozen.com  
*Counsel for Electrify America, LLC*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY           :**  
**FOR EXPEDITED APPROVAL TO EXTEND       :**     **Docket No. P-2023-3039439**  
**THE ELECTRIC VEHICLE DCFC PILOT         :**  
**RIDER BY 18 MONTHS                         :**

---

**ELECTRIFY AMERICA, LLC’S PETITION TO INTERVENE**

---

AND NOW COMES Electrify America, LLC (“Electrify America”), pursuant to 52 Pa. Code §§ 5.71-5.76, to file this Petition to Intervene in the above-referenced proceeding (the “DCFC Pilot Rider Extension Proceeding”). Electrify America operates Direct Current Fast Charging (“DCFC”) stations within the service territory of PECO Energy Company (“PECO”), and accordingly Electrify America is directly impacted by PECO’s DCFC Pilot Rider and has an interest in the above-captioned proceeding. More broadly, as one of the leading companies in electric vehicle (“EV”) public charging stations, Electrify America has a direct interest in the adoption and proliferation of EVs and in the success of the private market of charging companies that is necessary to achieve transportation electrification goals. Electrify America does not protest or otherwise object to an extension of PECO’s DCFC Pilot Rider. However, Electrify America provides certain recommendations to the Commission to improve the program, namely that (i) contract demand should not be set at nameplate capacity, which limits the ability of charging companies to benefit from demand charge credits; (ii) initial Procurement Class assignments and corresponding Generation Capacity Tags for Peak Load Contribution should reflect the current Procurement Class 3 as set forth in PECO’s Default Service Plan as opposed to a legacy Procurement Class 4; and (iii) PECO’s reservation of rights to modify and reduce demand credit values without advance notice or further participation introduces too much volatility that

undermines that efficacy of such demand charge credits for DCFC charging companies. Consequently, Electrify America has an interest that may be directly impacted by the DCFC Pilot Rider Extension Proceeding, which is not adequately represented by existing participants, and as to which Electrify America may be bound by the action of the Pennsylvania Public Utility Commission (“Commission” or “PUC”) in this proceeding.

In support whereof, Electrify America states:

1. Electrify America, the largest open DCFC network in the United States, is investing more than \$2 billion over ten years on Zero Emissions Vehicle (“ZEV”) infrastructure, education and awareness. This investment will enable millions of Americans to discover the benefits of electric driving and support the build-out of a nationwide network of ultra-fast community and highway chargers that are convenient and reliable. Electrify America expects to have more than 1,800 total charging stations with over 10,000 chargers in the United States and Canada by 2026. To date, Electrify America has built a coast-to-coast network of DCFC stations across over 780 locations and with over 3,330 individual DC fast chargers in total, including 21 locations with 86 individual DC fast chargers in Pennsylvania. Within PECO’s service territory, Electrify America currently operates 9 stations with 38 individual DC fast chargers. The chargers range from 150 kW to 350 kW of power based on anticipated needs and use cases, as well as available real estate and power. The ultra-fast 350 kW chargers are the most powerful public chargers on the market today, capable of recharging speeds close to gasoline fueling.

2. Electrify America anticipates further expansion in Pennsylvania, particularly given the presence of major highway corridors, metropolitan areas, and the expected influx of \$171 million dollars in Federal funding through the National Electric Vehicle Infrastructure (“NEVI”)

Formula Program.<sup>1</sup> Electrify America is uniquely situated as a non-proprietary charging network capable of providing up to 350 kW to capable vehicles in Pennsylvania, and more broadly is one of few charging networks statewide providing the fastest and most customer-friendly refueling speeds. Faster refueling speeds are widely recognized as instrumental in allowing the Commonwealth (and country) to realize its EV adoption and transportation electrification goals.

3. In Pennsylvania, the Department of Environmental Protection “acknowledges the significant role that electric vehicles (EV) will play in Pennsylvania’s transportation future” and finds that “boosting consumer confidence in EVs with a strategic rollout of EV charging stations to meet the projected demand” is vital “to support a regional clean transportation network.”<sup>2</sup> The Pennsylvania Electric Vehicle Roadmap provides that “having more charging stations available in workplace and public locations will go a long way to help current electric vehicle owners maximize their vehicle’s capabilities and decrease range anxiety for people considering an electric vehicle purchase.”<sup>3</sup> This is in line with Federal policy under recent infrastructure law investments and executive orders to develop a national network of 500,000 EV chargers along highways and in communities.<sup>4</sup> Public policy for the Commonwealth and the United States strongly support a nationwide buildout of public fast charging stations in order to confront the climate crisis through transportation electrification.

---

<sup>1</sup> PA PUC Docket P-2023-3039439, PECO Petition for Expedited Approval to Extend the Electric Vehicle DCFC Pilot Rider by 18 Months, p. 3.

<sup>2</sup> Pennsylvania Department of Environmental Protection, *Electric Vehicles in PA*, <https://www.dep.pa.gov/Business/Energy/OfficeofPollutionPrevention/ElectricVehicles/Pages/default.aspx>

<sup>3</sup> Pennsylvania Department of Environmental Protection, *Pennsylvania Electric Vehicle Roadmap: 2021 Update*, at p. 6, <https://files.dep.state.pa.us/Energy/OfficeofPollutionPrevention/StateEnergyProgram/PAElectricVehRoadmapBookletDEP5334.pdf>

<sup>4</sup> Fact Sheet, *Biden-Harris Administration Announces New Standards and Major Progress for a Made-in-America National Network of Electric Vehicle Chargers* (Feb. 15, 2023), <https://www.whitehouse.gov/briefing-room/statements-releases/2023/02/15/fact-sheet-biden-harris-administration-announces-new-standards-and-major-progress-for-a-made-in-america-national-network-of-electric-vehicle-chargers/>

4. Proceedings before the Commission have focused on the Commission’s potential to develop a Policy Statement on electric utility rate design for EV charging. *See* Docket No. P-2022-3030743. Electrify America has participated in a working group to provide joint stakeholder recommendations on an EV policy statement to the Commission, which were filed with the Commission in the form of a working group report on March 29, 2023.<sup>5</sup> In the working group report, Electrify America and a broad group of stakeholders recommend, among other things, that “the Commission should explicitly address rate design alternatives to demand rates in a policy statement on EV charging rate design” (p. 17). Electrify America looks forward to participating in future opportunities in this proceeding and with the working group, and Electrify America applauds the Commission, Staff, and other stakeholders for their work in developing a Policy Statement to promote EV infrastructure and electric utility rate design for EV charging.

5. Electrify America’s investment in Pennsylvania depends in part on sustainable economics for the private market of ZEV infrastructure. Utility rates and incentives should be structured to support infrastructure development in order to best align with Commonwealth public policy and ensure the financial sustainability of continued ZEV infrastructure operation. Incentivizing ZEV infrastructure and structuring particular rates for public charging stations are critical steps to allow the Commonwealth to realize its transportation electrification goals.

6. Traditional demand charges pose a significant barrier to achieving transportation electrification goals. This is because demand charges are often one of the most significant cost factors in DCFC station operation, determining whether charging companies have the financial capacity to generate a return on investment and open new locations. The burden presented by demand charges is greater for higher capacity DCFC, such as those operated by Electrify America,

---

<sup>5</sup> Pennsylvania Public Utility Commission, *Recommendations of the Electric Vehicle Charging Rate Design Working Group*, <https://www.puc.pa.gov/pcdocs/1779404.pdf>

which allow for faster refueling speeds and are considered to be essential for greater EV adoption. PECO’s Petition recognizes that meaningful demand charge relief is key to supporting “the Commonwealth’s ongoing efforts to incentivize DCFC development.”<sup>6</sup> Demand credits offered by PECO through its EV-FC Rider have the potential to provide such relief to encourage the private market for DCFC stations.

7. Electrify America supports an extension of the DCFC Pilot Rider, but respectfully requests that this proceeding provide an opportunity for the Commission to reconsider and correct certain suboptimal program elements.

8. Electrify America is supportive of an 18-month extension of the DCFC Pilot Rider, as requested by PECO. However, in the interest of a supportive utility environment to enable the private market of charging companies to succeed, Electrify America requests that the Commission reconsider the following elements of the program:

- a. Contract demand provisions that limit the ability of high-powered EV charging stations to receive demand credits;
- b. Conflict between the tariff language and actual practices regarding the assignment of Procurement Classes for new sites and the impact on initial Generation Capacity Tags for Peak Load Contribution (PLC); and
- c. Broad discretion left to PECO that has resulted in inconsistent assignments for contract demand, initial PLC tags, and surprise revisions to eligible demand credit amounts.

9. First, contract demand provisions should not be based on nameplate capacity, which limits the ability of customer-friendly, high-powered EV charging stations to receive demand

---

<sup>6</sup> PA PUC Docket P-2023-3039439, PECO Petition for Expedited Approval to Extend the Electric Vehicle DCFC Pilot Rider by 18 Months, p. 4.

charge relief. Many Electrify America stations have chargers that can furnish EV charging power of 350 kW and Electrify America is sizing DCFC stations in anticipation of the faster charging EVs that automakers are bringing to market.<sup>7</sup> The result is that Electrify America stations often have nameplate capacities of 1,000 kilowatts (kW) or higher. PECO’s tariffs for General Service (GS) and High Tension Power (HT) both have provisions where the minimum monthly billing demand is 40% of the contract demand and the DCFC Pilot Rider incorporates this provision by reference.<sup>8</sup> In instances where PECO has set the contract demand at station nameplate kW, the result is that Electrify America is often subject to minimum billed demands of 40% of station nameplate – which if applied, is greater than actual station peak loads for EV charging services and precludes the ability to benefit from the demand charge credits available through the DCFC Pilot Rider. Electrify America proposes that this issue could be remedied through policies that (i) set DCFC station contract demands at values less than station nameplate kW<sup>9</sup> or (ii) a waiver of the minimum billed demand of 40% of contract demand provision for DCFC stations enrolled in the DCFC Pilot Rider.

10. Second, Procurement Class assignments for new stations should align with PECO’s current Default Service Plan as opposed to a legacy Procurement Class that leads to inconsistencies and exposes charging companies to higher demand charge costs. The service contract for the DCFC Pilot Rider for new DCFC stations requires PECO to specify the Procurement Class for the account. In practice, this has led to controversies regarding the appropriate Procurement Class

---

<sup>7</sup> The trend towards high power charging requirements for DCFC stations is expected to accelerate given the requirement that DCFC stations receiving NEVI funds be able to deliver 150 kW of charging power at all times. *See* National Electric Vehicle Infrastructure Standards and Requirements, Final Rule, 88 Fed. Reg. 12724 (Feb. 28, 2023), § 680.106(d)

<sup>8</sup> PECO Tariff PA PUC No. 7, Original Page 84 states: “At no time will the billing demand be less than the minimum demand applicable under the provisions of the applicable Base Rate” in the Rate Impact section.

<sup>9</sup> For example, an engineering estimate of DCFC station peak demand could be estimated based on assumptions regarding high power EV charging sessions that may occur simultaneously.

assignment and Generation Capacity Tags for Peak Load Contribution (PLC) assigned to new DCFC station accounts. Electrify America identifies the following issues with current practices in regard to assignment of Procurement Class and PLC Tags:

- a. The service contract includes provisions for Procurement Class 4, which functionally no longer exists. PECO's tariff, Rules and Regulations Section 22.1(f), no longer includes Procurement Class 4, which was consolidated with Procurement Class 3 in PECO's fourth Default Service Plan (DSP IV) approved by the Commission in Docket No. P-2016-2534980 on December 8, 2016. PECO's DSP V, approved by the Commission in Docket No. P-2020-3019290, continues the consolidation of Procurement Classes 3 and 4. Both the 2016 and 2020 Default Service Plans waived 52 Pa. Code §§ 69.1805 and 54.187, requiring a separate procurement category for customers with peak loads greater than 500 kW under the statutory provision allowing Default Service Plans to propose alternative divisions of customers by registered peak load.
- b. The service contract states that customers assigned to Procurement Classes 2 and 3 will receive PLC tags equal to the average PLC for the customer's rate class, but PLC tags for Procurement Class 4 can be based on the customer's estimated load which has led to inconsistencies and in some cases attempts to set initial PLC's at station nameplate kW. This practice is inconsistent with Section 22.1(f) of the Rules and Regulations section of the PECO tariff which states that "*A new customer in a new facility shall be assigned to a procurement class based upon an engineering estimate of the customer's diversified peak demand.*"

Electrify America suggests that Procurement Class assignments for new DCFC stations should not be subject to arbitrary assignment and should be defaulted to Procurement Class 3 to allow new stations to receive the intended benefits of this program. These benefits to date have not been properly or fully realized due to PECO's discretionary actions that assign an incorrect high Procurement Class that remains in place for an extended period before resetting downwards—a key period when the benefits of the program are meant to help operating economics as utilization for the new stations slowly materializes. The current inconsistency between PECO's filed tariff and the service contract that has been incorporated into the Pilot Rider should be resolved.

11. Third, PECO's discretion to modify demand credits leads to surprise changes and does not afford charging companies the ability to accurately predict operation costs. PECO's tariff<sup>10</sup> affords the company considerable discretion to adjust and reduce the applicable demand credit value that is a key element of PECO's program and necessary to the success of the private market of charging companies. PECO's adjustments to the demand credit value, per the operative tariff, currently occur without oversight, without an ability to participate or protest such changes, and without any definable time schedule. PECO's "reservation of rights," in practice, allows PECO to expose charging companies to burdensome demand charges and introduces significant volatility to the economics of these charging stations, making it difficult to plan or otherwise anticipate increased costs. Electrify America suggests that the Commission eliminate or change this language to temper PECO's ability to modify demand credits during the pendency of this interim program. This will reduce surprises for charging companies, who are seeking to establish predictable rates and costs for operation.

---

<sup>10</sup> PECO Tariff PA PUC No. 7, Original Page 84.

12. Electrify America urges the Commission to consider these issues in this proceeding because DCFC station operators should be encouraged to build stations that are responsive to the needs of EV drivers who require fast charging and are capable of accommodating the next generation of high charging power EVs that automakers will bring to market in the next few years. The features of the PECO's DCFC Rate Pilot discussed above are at cross-purposes with these objectives.

13. Electrify America is encouraged by the progress made to-date to incentivize EV adoption and DCFC deployment in Pennsylvania and in PECO's service territory. An extension to the DCFC Pilot program, with certain adjustments made as described above, will provide a better utility environment for the private market of charging companies to succeed and will allow for more data to inform future studies and rate-making proposals. A strong private market for ZEV and DCFC infrastructure will additionally avoid utility owned and operated charging stations, which often involve higher costs to utility ratepayers.

14. Electrify America appreciates the efforts made by PECO and the Commission to encourage greater EV adoption in Pennsylvania. However, Electrify America recommends that the Commission implement tariff modifications to ensure that the program is successful and achieves its desired objectives. Minor changes to contract demand settings, Procurement Class and PLC tag assignments, and PECO's discretion to modify demand credits will ensure a more successful program for charging companies that will enable more stations to be opened.

15. Electrify America's counsel in this matter is reflected in the signature block below. Counsel for Electrify America will accept electronic service in this proceeding on behalf of the Company and will not require hard-paper copies of filed documents.

16. As explained in detail above, the Commission's disposition of PECO's Petition will impact the rates and services provided to Electrify America by PECO.

17. Consistent with 52 Pa. Code § 5.72(b), Electrify America has an interest that may be directly affected by this proceeding and that is not represented by any other party of record. Consequently, Electrify America should be granted intervenor status in this proceeding.

WHEREFORE, Electrify America respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide Electrify America with full party status in this proceeding.

Dated: April 19, 2023

Respectfully submitted,



---

William A. Lesser, Esq. (I.D. # 332951)  
Cozen O'Connor  
3 WTC  
175 Greenwich Street, 55th Floor  
New York, NY 10007  
Telephone: (212) 453-3808  
Facsimile: (646) 588-1450  
E-mail: wlesser@cozen.com  
*Counsel for Electrify America, LLC*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY        :**  
**FOR EXPEDITED APPROVAL TO EXTEND        :**     **Docket No. P-2023-3039439**  
**THE ELECTRIC VEHICLE DCFC PILOT         :**  
**RIDER BY 18 MONTHS                         :**

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served copies of **Electrify America LLC's Letter to Withdraw its Petition to Intervene** on the persons listed below, in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54.

Dated: August 23, 2023

Respectfully submitted,



---

William A. Lesser, Esq. (PA I.D. # 332951)  
Cozen O'Connor  
3 WTC  
175 Greenwich Street, 55th Floor  
New York, NY 10007  
Telephone: (212) 453-3808  
Facsimile: (646) 588-1450  
E-mail: wlesser@cozen.com  
*Counsel for Electrify America, LLC*

**Via Electronic Mail**

Nakea S. Hurdle  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place – First Floor 555 Walnut  
Street Harrisburg, PA 17101  
nhurdle@pa.gov  
*Counsel for OSBA*

Carrie B. Wright  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street Harrisburg, PA 17120  
carwright@pa.gov  
*Counsel for I&E*

Kenneth M. Kulak  
Catherine G. Vasudevan  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
ken.kulak@morganlewis.com  
catherine.vasudevan@morganlewis.com  
*Counsel for PECO Energy Company*

Joseph L. Vullo  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
jlvullo@bvrrlaw.com  
*Counsel for Communication Action  
Association of PA*

Mark Belland  
O'Brien, Belland, & Bushinsky, LLC  
500-506 North 6th Street  
Philadelphia, PA 19123  
mbelland@obbblaw.com  
*Counsel for LIUNA*

Mark C. Hammond  
Land Air Water Legal Solutions, LLC  
1000 Westlakes Dr., Suite 150  
Berwyn, PA 19312  
mhammond@landairwater.com  
*Counsel for Tesla*

Charis Mincavage  
Adeolu A. Bakare  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
*Counsel for PAIEUG*

Aron Beatty  
Christy Appleby  
Barrett Sheridan  
Office of Consumer Advocate  
5th Floor Forum Place  
555 Walnut Street  
Harrisburg PA 17101-1923  
[abeatty@paoca.org](mailto:abeatty@paoca.org)  
[bsheridan@paoca.org](mailto:bsheridan@paoca.org)  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
*Counsel for OCA*

Karen O. Moury  
Deanne M. O'Dell  
Sarah C. Stoner  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street – 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[sstoner@eckertseamans.com](mailto:sstoner@eckertseamans.com)  
*Counsel for RESA and NRG*

John F. Lushis, Jr.,  
Norris McLaughlin, P.A.  
Suite 502  
515 West Hamilton Street  
Allentown, PA 18101  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)  
*Counsel for Calpine Retail Holdings, LLC*

Elizabeth R. Marx  
John W. Sweet  
Ria M. Pereira  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
*Counsel for CAUSE-PA*

Joline R. Price  
Robert W. Ballenger  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
*Counsel for TURN*

Cody T. Murphey  
Eckert Seamans Cherin & Mellott, LLC  
919 East Main Street – Suite 1300  
Richmond, VA 23219  
[cmurphey@eckertseamans.com](mailto:cmurphey@eckertseamans.com)  
*Counsel for RESA and NRG*

James Laskey  
Norris McLaughlin, P.A.  
400 Crossing Boulevard – 8<sup>th</sup> Floor  
Bridgewater, NJ 08807  
[jlasky@norris-law.com](mailto:jlasky@norris-law.com)  
*Counsel for Calpine Retail Holdings, LLC*

Devin McDougall  
Earthjustice  
Suite 2020  
1617 John F. Kennedy Boulevard  
Philadelphia, PA 19103  
[dmcdougall@earthjustice.org](mailto:dmcdougall@earthjustice.org)  
*Counsel for Clean Energy Advocates*

Rebecca Barker  
Earthjustice  
Suite 1400  
311 South Wacker Drive  
Chicago, IL 60606  
[rbarker@earthjustice.org](mailto:rbarker@earthjustice.org)  
*Counsel for Clean Energy Advocates*

David P. Zambito  
Jonathan P. Nase  
Cozen O'Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101-1236  
[dzambito@cozen.com](mailto:dzambito@cozen.com)  
[jnase@cozen.com](mailto:jnase@cozen.com)  
*Counsel for UPENN*

Scott Dunbar  
Keyes & Fox LLP  
1580 Lincoln Street, Suite 1105  
Denver, CO 80203  
[sdunbar@keyesfox.com](mailto:sdunbar@keyesfox.com)  
*Counsel for ChargePoint, Inc.*

Robert A. Weishaar, Jr.  
McNees Wallace & Nurick LLC  
8490 Progress Drive  
Frederick, MD 21701  
[bweishaar@mcneeslaw.com](mailto:bweishaar@mcneeslaw.com)  
*Counsel for Amtrak*

Derrick Price Williamson  
Barry A. Naum  
Spilman Thomas & Battle, PLLC 1100 Bent  
Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)  
*Counsel for ArcelorMittal*

Scott J. Rubin  
333 Oak Lane  
Bloomsburg, PA 17815-2036  
[scott.j.rubin@gmail.com](mailto:scott.j.rubin@gmail.com)  
*Counsel for IBEW*

Charles T. Joyce  
Spear Wilderman, P.C.  
230 South Broad Street, Suite 1400  
Philadelphia, PA 19102  
[ctjoyce@spearwilderman.com](mailto:ctjoyce@spearwilderman.com)  
*Counsel for IBEW*

Donald R. Wagner  
Linda R. Evers  
Michael A. Gruin  
Stevens & Lee  
111 N. Sixth Street  
Reading, PA 19601  
[donald.wagner@stevenslee.com](mailto:donald.wagner@stevenslee.com)  
[linda.evers@stevenslee.com](mailto:linda.evers@stevenslee.com)  
[michael.gruin@stevenslee.com](mailto:michael.gruin@stevenslee.com)  
*Counsel for Walmart Inc.*

Derrick Price Williamson  
Barry A. Naum  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)  
*Counsel for Walmart Inc.*