



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

January 4, 2024

***Via Electronic Mail***

Honorable John M. Coogan  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120  
[jcoogan@pa.gov](mailto:jcoogan@pa.gov)

Re: Pennsylvania Public Utility Commission,  
Bureau of Investigation and Enforcement v.  
Planet Energy (Pennsylvania) Corp.  
d/b/a RiteRate Energy d/b/a Value Plus Energy  
Docket No. C-2023-3041126  
**Pre-Served Rebuttal Testimony  
of the Bureau of Investigation and Enforcement**

Dear Judge Coogan:

Enclosed please find the following **Pre-Served Rebuttal Testimony of the Bureau of Investigation and Enforcement's (I&E) witness:**

**I&E Statement No. 2-R – Daniel Mumford**

Copies have been served on the parties of record in accordance with the Certificate of Service. If you have any questions, please contact the undersigned.

Sincerely,

Michael L. Swindler  
Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 43319  
(717) 783-6369  
[mwindler@pa.gov](mailto:mwindler@pa.gov)

MLS/jfm  
Enclosures

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only – via e-file*)  
Daniel Mumford, Director OCMO (*via email- [dmumford@pa.gov](mailto:dmumford@pa.gov)*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2023-3041126
	:	
Planet Energy (Pennsylvania) Corp.	:	
d/b/a RiteRate Energy	:	
d/b/a Value Plus Energy	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing **Pre-Served Rebuttal Testimony of the Bureau of Investigation and Enforcement** dated January 4, 2024, upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**Service by Electronic Mail Only**

Jordan Small  
Vice President  
Regulatory Affairs & Compliance  
Planet Energy (Pennsylvania) Corp.  
1691 Michigan Avenue, Suite 425  
Miami Beach, Florida 33139  
[jsmall@planetenergy.ca](mailto:jsmall@planetenergy.ca)

Jayne Risk, Esq.  
Brian J. Doyle, Esq.  
DLA Piper LLP  
One Liberty Place  
1650 Market Street, Suite 5000  
Philadelphia, PA 19103-7300  
[jayne.risk@us.dlapiper.com](mailto:jayne.risk@us.dlapiper.com)  
[brian.boyle@us.dlapiper.com](mailto:brian.boyle@us.dlapiper.com)

Sharon E. Webb, Esq.  
Commonwealth of Pennsylvania  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor, Forum Place  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)

Christine M. Hoover, Esq.  
David T. Evrard, Esq.  
Christopher M. Andreoli, Esq.  
Commonwealth of Pennsylvania  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101  
[choover@paoca.org](mailto:choover@paoca.org)  
[devrard@paoca.org](mailto:devrard@paoca.org)  
[candreoli@paoca.org](mailto:candreoli@paoca.org)



---

Michael L. Swindler  
Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 43319  
(717) 783-6369  
[mwindler@pa.gov](mailto:mwindler@pa.gov)