

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE  
555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
(800) 684-6560

 @pa\_oca  
 /pennoca  
FAX (717) 783-7152  
consumer@paoca.org  
www.oca.pa.gov

May 3, 2024

**Via Electronic Mail Only**

David B. MacGregor  
Michael W. Hassell  
Megan Rulli  
Post & Schell, P.C.  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101-1601  
dmacgregor@postschell.com  
mhassell@postschell.com  
mrulli@postschell.com

Re: Petition of PPL Electric Utilities Corporation  
For Approval of a Default Service Program  
And Procurement Plan for the Period June 1,  
2025 Through May 31, 2029

Docket No. P-2024-3047290

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set 4, in the above-referenced proceeding.

In accordance with the discovery modifications ordered during the Prehearing Conference on April 26, 2024, we request PPL Electric Utilities Corporation provide verified answers to these inquiries within ten (10) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed.

We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

David B. MacGregor  
Michael W. Hassell  
Megan Rulli  
May 3, 2024  
Page 2

OCAPPLDSP2024@paoca.org

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,



Christy M. Appleby  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
cappleby@paoca.org

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service Only)  
Certificate of Service

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities Corporation :  
For Approval of a Default Service Program And :  
Procurement Plan for the Period June 1, 2025 : Docket No. P-2024-3047290  
Through May 31, 2029 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to PPL Electric Utilities Corporation, Set 4, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below. This document was filed electronically on the Commission’s electronic filing system.

Dated this 3<sup>rd</sup> day of May, 2024.

SERVICE BY E-MAIL ONLY

David B. MacGregor  
Michael W. Hassell  
Megan Rulli  
Post & Schell, P.C.  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101-1601  
dmacgregor@postschell.com  
mhassell@postschell.com  
mrulli@postschell.com  
*Counsel for PPL Electric*

Rebecca Lyttle, Esquire  
Sharon E. Webb, Esquire  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor Harrisburg,  
Pennsylvania 17101  
relyttle@pa.gov  
swebb@pa.gov  
*Counsel for OSBA*

Elizabeth R. Marx, Esquire  
John W. Sweet, Esquire  
Ria Pereira, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
emarxpulp@palegalaid.net  
*Counsel for CAUSE-PA*

Kimberly A. Klock  
Michael J. Shafer  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
kklock@pplweb.com  
mjshafer@pplweb.com  
*Counsel for PPL Electric*

Allison Kaster, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
akaster@pa.gov  
*Counsel for I&E*

Adeolu A. Bakare, Esquire  
Harrison Ryan Block, Esquire  
McNees, Wallace & Nurick  
P.O. Box 1166  
100 Pine Street  
Harrisburg, PA 17108-1166  
abakare@mcneeslaw.com  
[rblock@mcneeslaw.com](mailto:rblock@mcneeslaw.com)  
*Counsel for PPLICA*

SERVICE BY E-MAIL ONLY (continued)


Karen O. Moury, Esquire  
Deanne M. O'Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
Harrisburg, PA 17101  
kmoury@eckertseamans.com  
dodell@eckertseamans.com  
*Counsel for RESA*

Clifford B. Levine, Esquire  
Dentons Cohen & Grigsby  
625 Liberty Ave.  
Pittsburgh, PA 15222-3152  
Clifford.levine@dentons.com  
*Counsel for Shell Energy North America, LP*

Lauren M. Burge, Esquire  
Eckert Seamans Cherin & Mellott, LLC 600 Grant  
Street, 44<sup>th</sup> Floor  
Pittsburgh, PA 15219  
lburge@eckertseamans.com  
*Counsel for RESA and NRG*

David C. Berger, Esquire  
NORRIS McLAUGHLIN, P.A.  
515 W. Hamilton Street Suite 502  
Allentown, PA 1810  
dberger@norris-law.com  
*Counsel for Calpine Retail Holdings, LLC*

Rebecca E. Kennedy  
Dentons Cohen & Grigsby  
1900 K Street, NW  
Washington, DC 20006  
Rebecca.Kennedy@dentons.com  
*Counsel for Shell Energy North America, LP*

  
Christy M. Appleby  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
cappleby@paoca.org

Emily A. Farren  
Assistant Consumer Advocate  
efarren@paoca.org

*Counsel for:*  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
717-783-5048

Dated: May 3, 2024