

Morgan Lewis

Kenneth M. Kulak

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

May 9, 2024

VIA eFILING

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

**Re: Pennsylvania Public Utility Commission v.
PECO Energy Company - Gas Division
Docket No. R-2024-3046932**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced matter is the **Certificate of Service** evidencing service of **PECO Energy Company's Responses to the following Interrogatories of the Office of Consumer Advocate**:

1. Set VI, Question Nos. 1 and 35
2. Set VII, Question No. 16

Copies have been served in accordance with the enclosed Certificate of Service.

If you have any questions, please contact me directly at 215.963.5384.

Very truly yours,



Kenneth M. Kulak

KMK/ap

Enclosures

c: Certificate of Service (w/encls.)

Morgan, Lewis & Bockius LLP

2222 Market Street
Philadelphia, PA 19103-3007
United States

T +1.215.963.5000
F +1.215.963.5001

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC
UTILITY COMMISSION**

v.

**PECO ENERGY COMPANY –
GAS DIVISION**

:
:
:
:
:
:
:

DOCKET NO. R-2024-3046932

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the foregoing documents on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

Erin L. Gannon
Barrett C. Sheridan
Gina L. Miller
Jacob D. Guthrie
Consumer Advocate
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1923
OCAGASPECO2024@paoca.org
Counsel for Office of Consumer Advocate (“OCA”)

Steven C. Gray
Rebecca Lyttle
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov
relyttle@pa.gov
Counsel for Office of Small Business Advocate (“OSBA”)

Carrie B. Wright
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
carwright@pa.gov
Counsel for Bureau of Investigation & Enforcement (“BI&E”)

Charis Mincavage
Adeolu A. Bakare
Brigid Landy Khuri
McNees Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17108-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
bkhuri@mcneeslaw.com
Counsel for Philadelphia Area Industrial Energy Users Group (“PAIEUG”)

Todd S. Stewart
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
*Counsel for the Southeastern
Pennsylvania Transportation
Authority (SEPTA)*

Charles T. Joyce
Spear Wilderman, P.C.
230 South Broad Street, Suite 1650
Philadelphia, PA 19102
ctjoyce@spearwilderman.com
*Counsel for Local 614 of the International
Brotherhood of Electrical Workers,
AFL-CIO (“IBEW Local 614”)*

Derrick Price Williamson
Barry A. Naum
Steven W. Lee
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
slee@spilmanlaw.com
Counsel for Walmart Inc.

Alan McCarthy
705 East Barnard Street
West Chester, PA 19382
alanmccarthy25@hotmail.com
Pro Se

David P. Zambito
Jonathan P. Nase
Cozen O’Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
dzambito@cozen.com
jnase@cozen.com
*Counsel for The Trustees of the University
of Pennsylvania and The Hospital at the
University of Pennsylvania (“UPENN”)*

Nicholas J. Enoch
Lubin & Enoch, P.C.
349 North 4th Avenue
Phoenix, AZ 85003-1505
nick@lubinandenoch.com
Counsel for IBEW Local 614

Charlotte E. Edelstein
Joline R. Price
Vikram A. Patel
Robert W. Ballenger
Community Legal Services, Inc.
1410 West Erie Avenue
Philadelphia, PA 19140
cedelstein@clsphila.org
jprice@clsphila.org
vpatel@clsphila.org
rballenger@clsphila.org
*Counsel for Coalition for Affordable
Utility Services and Energy Efficiency in
Pennsylvania (“CAUSE-PA”)*

Christina Sappey
State Representative
698 Unionville Road
Kennett Square, PA 19348
repsappey@pahouse.net
Pro Se

CONSULTANTS / WITNESSES

John DeFever
Larkin & Associates, PLLC
15728 Farmington Road
Livonia, MI 48154
OCAGASPECO2024@paoca.org
Witness for OCA

David Garrett
Resolve Utility Consulting PLLC
101 Park Avenue, Suite 1125
Oklahoma City, OK 73102
OCAGASPECO2024@paoca.org
Witness for OCA

Nicholas A. DeMarco
Regulatory Analyst
Office of Consumer Advocate
555 Walnut Street
5th Floor – Forum Place
Harrisburg, PA 17101-1923
OCAGASPECO2024@paoca.org
Witness for OCA

Anthony Spadaccio
aspadaccio@pa.gov
Witness for BI&E

Ethan Cline
etcline@pa.gov
Witness for BI&E

Robert D. Knecht
Industrial Economics, Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
rdk@indecon.com
Consultant for OSBA

Clarence Johnson
CJ Energy
3707 Robinson Avenue
Austin, TX 78722
OCAGASPECO2024@paoca.org
Witness for OCA

Roger Colton
Fisher, Sheehan, & Colton
34 Warwick Road
Belmont, MA 02478
OCAGASPECO2024@paoca.org
Witness for OCA

Ron Nelson
Volt-Watt Consulting LLC
1311 SE 53rd Avenue
Portland, OR 97215
OCAGASPECO2024@paoca.org
Witness for OCA

Christopher Keller
chrkeller@pa.gov
Witness for BI&E

Martin Salamonski
msalamonsk@pa.gov
Witness for BI&E

Jeffrey Pollock
Billie S. LaConte
J. Pollock, Inc.
14323 South Outer 40 Road
Suite 206N
Town and Country, MO 63017
jcp@jpollockinc.com
bsl@jpollockinc.com
Consultants for PAIEUG

Elizabeth Marx
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
emarx@pautilitylawproject.org
Witness for CAUSE-PA

James Glenn
IBEW Local 614
4613 West Chester Pike, Upper Level
Newtown Square, PA 19073
jamesglenn@614ibew.com
Witness for IBEW Local 614



Kenneth M. Kulak (Pa. No. 75509)
Mark A. Lazaroff (Pa. No. 315407)
Catherine G. Vasudevan (Pa. No. 210254)
Brooke E. McGlinn (Pa. No. 204918)
Morgan, Lewis & Bockius LLP
2222 Market Street
Philadelphia, PA 19103-3007
215.963.5384 (bus)
215.963.5001 (fax)
ken.kulak@morganlewis.com
mark.lazaroff@morganlewis.com
catherine.vasudevan@morganlewis.com
brooke.mcglinn@morganlewis.com

Dated: May 9, 2024

Counsel for PECO Energy Company

DB1/ 147258171.1