



COMMONWEALTH OF PENNSYLVANIA

May 15, 2024

**E-FILED**

The Honorable Eranda Vero  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

The Honorable Arlene Ashton  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

**Re: Petition of PECO Energy Company for Approval of Its Default Service Plan for the Period from June 1, 2025 through May 31, 2029 (“DSP VI Petition”) / Docket Number: P-2024-3046008**

Dear Judge Vero and Judge Ashton:

Enclosed please find the Rebuttal Testimony of Mark D. Ewen, labelled **OSBA Statement No. 1-R**, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

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

Sincerely,

*/s/ Rebecca Lyttle*

Rebecca Lyttle  
Assistant Small Business Advocate  
Attorney ID No. 201399

*Enclosures*

cc: PA PUC Secretary Rosemary Chiavetta (Cover Letter & Certificate of Service only)  
Mark D. Ewen  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PECO Energy Company for : Docket Number: P-2024-3046008**  
**Approval of Its Default Service Plan for :**  
**the Period from June 1, 2025 through May :**  
**31, 2029 (“DSP VI Petition”) :**

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Eranda Vero  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
[evero@pa.gov](mailto:evero@pa.gov)

The Honorable Arlene Ashton  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
[aashton@pa.gov](mailto:aashton@pa.gov)

Barrett Sheridan, Esquire  
Andrew J. Zerby, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101  
[OCA2024PECODSP@paoca.org](mailto:OCA2024PECODSP@paoca.org)

Elizabeth J. Sher, Esquire  
Alexander Judd, Esquire  
Sophia Browning, Esquire  
Day Pitney, LLP  
One Jefferson Road  
Parsippany, NJ 07054-2891  
[esher@daypitney.com](mailto:esher@daypitney.com)  
[ajudd@daypitney.com](mailto:ajudd@daypitney.com)  
[sbrowning@daypitney.com](mailto:sbrowning@daypitney.com)

Allison Kaster, Esquire  
Director  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Daniela Rakhlina-Powsner, Esquire  
Robert W. Ballenger, Esquire  
Joline R. Price, Esquire  
Vikram A. Patel, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
[drakhlinapowsner@clsphila.org](mailto:drakhlinapowsner@clsphila.org)  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[vpatel@clsphila.org](mailto:vpatel@clsphila.org)

John F. Lushis, Jr., Esquire  
Norris McLaughlin, P.A.  
515 W. Hamilton Street, Suite 502  
Allentown, PA 18101  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)

Karen O. Moury, Esquire  
Deanne M. O'Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8th Floor  
Harrisburg, PA 17101  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)

Lauren M. Burge, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
600 Grant Street, 44th Floor  
Pittsburgh, PA 15219  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)

Charis Mincavage, Esquire  
Adeolu A. Bakare, Esquire  
McNees, Wallace & Nurick LLC  
100 Pine Street  
Harrisburg, PA 17108-1166  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)

Devin McDougall, Esquire  
Earthjustice  
1617 John F. Kennedy Blvd., Suite 2020  
Philadelphia, PA 19103  
[dmcDougall@earthjustice.org](mailto:dmcDougall@earthjustice.org)

Brandon J. Pierce, Esquire  
Assistant General Counsel  
PECO Energy Company  
2301 Market Street/S23-1  
Philadelphia, PA 19103  
[Brandon.Pierce@exeloncorp.com](mailto:Brandon.Pierce@exeloncorp.com)

Kenneth M. Kulak, Esquire  
Mark A. Lazaroff, Esquire  
Catherine G. Vasudevan, Esquire  
Brooke E. McGlinn, Esquire  
Morgan, Lewis & Bockius LLP  
2222 Market Street  
Philadelphia, PA 19103-3007  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)

Elizabeth R. Marx, Esquire  
John Sweet, Esquire  
Ria Pereira, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)  
[jsweet@pautilitylawproject.org](mailto:jsweet@pautilitylawproject.org)  
[rpereira@pautilitylawproject.org](mailto:rpereira@pautilitylawproject.org)

DATE: May 15, 2024

Respectfully submitted,

*/s/ Rebecca Lyttle*

---

Rebecca Lyttle  
Assistant Small Business Advocate  
Attorney ID # 201399