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

May 16, 2024

Via Electronic Email

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

Re: Pennsylvania Public Utility Commission

٧.

PECO Energy Co. - Gas Division Docket No. R-2024-3046932

Dear Counsel,

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set 11, in this matter.

We request that PECO Energy Company – Gas Division 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.

Kenneth M. Kulak, Esquire Mark A. Lazaroff, Esquire Brooke E. McGlinn, Esquire Catherine G. Vasudevan, Esquire May 16, 2024 Page 2

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

OCAGASPECO2024@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,

Erin L. Gannon Senior Assistant Consumer Advocate PA Attorney I.D. # 83487 EGannon@paoca.org

Enclosures:

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

Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission

•

٧.

Docket No. R-2024-3046932

PECO Energy Company - Gas Division

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to PECO Energy Company – Gas Division, Set 11, 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.

Dated this 16th day of May 2024.

SERVICE BY E-MAIL ONLY

*Confidential Version will be provided to PECO Energy Co. only

Carrie B. Wright, Esquire

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

Anthony E. Gay

Jack R. Garfinkle

Brandon J. Pierce Adesola K. Adegbesan

PECO Energy Company

2301 Market Street

Philadelphia, PA 19103

anthony.gay@exeloncorp.com jack.garfinkle@exeloncorp.com

brandon.pierce@exeloncorp.com

adesola.adegbesan@exeloncorp.com

Counsel for PECO Energy Co. - Gas

Steven C. Gray, Esq. Rebecca Lyttle, Esq.

Office of Small Business Advocate

Forum Place

555 Walnut Street, 1st Floor

Harrisburg, PA 17101

sgray@pa.gov

relyttle@pa.gov

Counsel for OSBA

Kenneth M. Kulak

Mark A. Lazaroff

Brooke E. McGlinn

Catherine G. Vasudevan

Morgan, Lewis & Bockius LLP

2222 Market Street

Philadelphia, PA 19103

ken.kulak@morganlewis.com

mark. lazar of f@morgan lew is. com

brooke.mcglinn@morganlewis.com

catherine.vasudevan@morganlewis.com

Counsel for PECO Energy Company

SERVICE BY E-MAIL ONLY

Alan McCarthy 705 E. Barnard St. West Chester, PA 19382 alanmccarthy25@hotmail.com

Charlotte E. Edelstein
Joline R. Price
Vikram A. Patel
Robert W. Ballenger
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
cedelstein@clsphila.org
jprice@clsphila.org
vpatel@clsphila.org
rballenger@clsphila.org
Counsel for CAUSE-PA

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.

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

Representative Christina Sappey 698 Unionville Rd. Kennett Square, PA 19348 RepSappey@pahouse.net

Charles T. Joyce
Samuel E. Shopp
SPEAR WILDERMAN, P.C.
230 South Broad Street, Ste. 1650
Philadelphia, Pennsylvania 19102
ctjoyce@spearwilderman.com
sshopp@spearwilderman.com
Counsel for Local 614 of the International
Brotherhood of Electrical Works

Nicholas J. Enoch LUBIN & ENOCH, P.C. 349 North 4th Avenue Phoenix, Arizona 85003-1505 nick@lubinandenoch.com Counsel for Local 614 of the International Brotherhood of Electrical Works

1s/ Erin L. Gannon

Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
EGannon@paoca.org

Gina L. Miller
Barrett C. Sheridan
Jacob D. Guthrie
Assistant Consumer Advocates
OCAGASPECO2024@paoca.org

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

Dated: May 16, 2024