

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 24, 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
v.
PECO Energy Co. - Gas Division
Docket No. R-2024-3046932

Dear Counsel,

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Sets 15 and 16, in this matter.

In accordance with the discovery modifications set forth in the Prehearing Order issued on May 22, 2024, 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 24, 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,

/s/ Erin L. Gannon

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 :
v. : 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, Sets 15-16, 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 24th day of May 2024.

SERVICE BY E-MAIL 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

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

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

Kenneth M. Kulak
Mark A. Lazaroff
Brooke E. McGlenn
Catherine G. Vasudevan
Morgan, Lewis & Bockius LLP
2222 Market Street
Philadelphia, PA 19103
ken.kulak@morganlewis.com
mark.lazaroff@morganlewis.com
brooke.mcglenn@morganlewis.com
catherine.vasudevan@morganlewis.com
Counsel for PECO Energy Company

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

SERVICE BY E-MAIL ONLY

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

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*

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

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*

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.

/s/ Erin L. Gannon

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

Gina L. Miller
Senior Assistant Consumer Advocate
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 24, 2024