

# Morgan Lewis

**Kenneth M. Kulak**

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

May 30, 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-captioned matter is the **Certificate of Service** evidencing service of **PECO Energy Company's Responses to the Interrogatories of the Office of Consumer Advocate, Set XI, Question Nos. 12, 16, 25, and 28.**

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

If you have any questions regarding this filing, please contact me directly at 215.953.5384.

Very truly yours,



Kenneth M. Kulak

KMK/tp  
Enclosures

c: Per 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, 5<sup>th</sup> Floor  
555 Walnut Street  
Harrisburg, PA 17101-1923  
[OCAGASPECO2024@paoca.org](mailto: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](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto: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](mailto: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](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[bkhuri@mcneeslaw.com](mailto: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](mailto:tsstewart@hmslegal.com)  
*Counsel for the Southeastern  
Pennsylvania Transportation  
Authority (SEPTA)*

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

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

Nicholas J. Enoch  
Lubin & Enoch, P.C.  
349 North 4<sup>th</sup> Avenue  
Phoenix, AZ 85003-1505  
[nick@lubinandenoch.com](mailto:nick@lubinandenoch.com)  
*Counsel for 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](mailto:dwilliamson@spilmanlaw.com)  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)  
[slee@spilmanlaw.com](mailto:slee@spilmanlaw.com)  
*Counsel for Walmart Inc.*

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](mailto:cedelstein@clsphila.org)  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[vpatel@clsphila.org](mailto:vpatel@clsphila.org)  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
*Counsel for Coalition for Affordable  
Utility Services and Energy Efficiency in  
Pennsylvania ("CAUSE-PA")*

Alan McCarthy  
705 East Barnard Street  
West Chester, PA 19382  
[alanmccarthy25@hotmail.com](mailto:alanmccarthy25@hotmail.com)  
*Pro Se*

Christina Sappey  
State Representative  
698 Unionville Road  
Kennett Square, PA 19348  
[repsappey@pahouse.net](mailto:repsappey@pahouse.net)  
*Pro Se*

## CONSULTANTS / WITNESSES

John DeFever  
Larkin & Associates, PLLC  
15728 Farmington Road  
Livonia, MI 48154  
[OCAGASPECO2024@paoca.org](mailto:OCAGASPECO2024@paoca.org)  
*Witness for OCA*

David Garrett  
Resolve Utility Consulting PLLC  
101 Park Avenue, Suite 1125  
Oklahoma City, OK 73102  
[OCAGASPECO2024@paoca.org](mailto:OCAGASPECO2024@paoca.org)  
*Witness for OCA*

Nicholas A. DeMarco  
Regulatory Analyst  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor – Forum Place  
Harrisburg, PA 17101-1923  
[OCAGASPECO2024@paoca.org](mailto:OCAGASPECO2024@paoca.org)  
*Witness for OCA*

Anthony Spadaccio  
[aspadaccio@pa.gov](mailto:aspadaccio@pa.gov)  
*Witness for BI&E*

Ethan Cline  
[etcline@pa.gov](mailto:etcline@pa.gov)  
*Witness for BI&E*

Robert D. Knecht  
Industrial Economics, Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)  
*Consultant for OSBA*

Clarence Johnson  
CJ Energy  
3707 Robinson Avenue  
Austin, TX 78722  
[OCAGASPECO2024@paoca.org](mailto:OCAGASPECO2024@paoca.org)  
*Witness for OCA*

Roger Colton  
Fisher, Sheehan, & Colton  
34 Warwick Road  
Belmont, MA 02478  
[OCAGASPECO2024@paoca.org](mailto:OCAGASPECO2024@paoca.org)  
*Witness for OCA*

Ron Nelson  
Volt-Watt Consulting LLC  
1311 SE 53<sup>rd</sup> Avenue  
Portland, OR 97215  
[OCAGASPECO2024@paoca.org](mailto:OCAGASPECO2024@paoca.org)  
*Witness for OCA*

Christopher Keller  
[chrkeller@pa.gov](mailto:chrkeller@pa.gov)  
*Witness for BI&E*

Martin Salamonski  
[msalamonsk@pa.gov](mailto: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](mailto:jcp@jpollockinc.com)  
[bsl@jpollockinc.com](mailto:bsl@jpollockinc.com)  
*Consultants for PAIEUG*

Elizabeth Marx  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)  
*Witness for CAUSE-PA*

James L. Crist  
Lumen Group, Inc.  
4226 Yarmouth Drive, Suite 101  
Allison Park, PA 15101  
[jlcrist@aol.com](mailto:jlcrist@aol.com)  
*Witness for SEPTA*

James Glenn  
IBEW Local 614  
4613 West Chester Pike, Upper Level  
Newtown Square, PA 19073  
[jamesglenn@614ibew.com](mailto: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](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)

Dated: May 30, 2024

*Counsel for PECO Energy Company*

DB1/ 147850426.1