

---

Megan E. Rulli

mrulli@postschell.com  
717-612-6012 Direct  
717-731-1985 Direct Fax  
File #: 203590

June 7, 2024

**VIA EMAIL**

Deanne M. O'Dell, Esquire  
Karen O. Moury, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101

**Re: Petition of PPL Electric Utilities Corporation for Approval of Its Default Service Program for the Period from June 1, 2025 through May 31, 2029  
Docket No. P-2024-3047290**

---

Dear Counsel:

Attached please find the discovery requests on behalf of PPL Electric Utilities Corporation directed to the Retail Energy Supply Association ("RESA"), Set II, in the above-referenced proceeding. Copies are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/kl  
Attachment

cc: Rosemary Chiavetta, Secretary (*letter and Certificate of Service only*)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA E-MAIL

Christy Appleby, Esquire  
Emily A. Farren, Esquire  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[efarren@paoca.org](mailto:efarren@paoca.org)  
[OCAPPLDSP2024@paoca.org](mailto:OCAPPLDSP2024@paoca.org)

Allison Kaster, Prosecutor  
PA Public Utility Commission  
Bureau of Investigation & Enforcement  
400 North Street, 2<sup>nd</sup> Floor West  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[akaster@pa.gov](mailto:akaster@pa.gov)

Sharon Webb, Esquire  
Rebecca Lyttle, Esquire  
Office of Small Business Advocate  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

Adeolu A. Bakare, Esquire  
Harrison Ryan Block, Esquire  
McNees, Wallace & Nurick  
P.O. Box 1166  
100 Pine Street  
Harrisburg, PA 17108-1166  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[rblock@mcneeslaw.com](mailto:rblock@mcneeslaw.com)  
*Counsel for PPLICA*

Elizabeth R. Marx, Esquire  
John W. Sweet, Esquire  
Ria M. Pereira, Esquire  
Lauren N. Berman, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
*Counsel for CAUSE-PA*

John F. Lushis, Jr., Esquire  
Norris McLaughlin P.A.  
515 West Hamilton Street, Suite 502  
Allentown, PA 18101  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)  
*Counsel for Calpine Retail  
Holdings LLC*

Deanne M. O'Dell, Esquire  
Karen O. Moury, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
*Counsel for Intervenor RESA*

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

Deanne M. O'Dell, Esquire  
Karen O. Moury, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
*Counsel for Intervenor NRG Energy, Inc.*

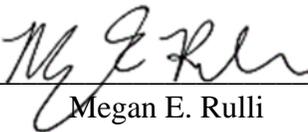
Lauren M. Burge, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
600 Grant Street, 44th Floor  
Pittsburgh, PA 15219  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)  
*Counsel for Intervenor NRG Energy, Inc*

Mark Ewen  
Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[mde@indecon.com](mailto:mde@indecon.com)  
*Consultant for OSBA*

Date: June 7, 2024

Clifford B. Levine, Esquire  
Dentons Cohen & Grigsby  
624 Liberty Avenue  
Pittsburgh, PA 15222-3152  
[Clifford.levine@dentons.com](mailto:Clifford.levine@dentons.com)  
*Counsel for Intervenor Shell Energy North  
America (US), L.P.*

Rebecca E. Kennedy, Esquire  
Dentons US LLP  
1900 K Street, NW  
Washington, DC 20006  
[Rebecca.kennedy@dentons.com](mailto:Rebecca.kennedy@dentons.com)  
*Counsel for Intervenor Shell Energy North  
America (US), L.P.*

  
\_\_\_\_\_  
Megan E. Rulli