

Morgan Lewis

Kenneth M. Kulak

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

June 11, 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 - Electric Division
Docket No. R-2024-3046931**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced matter is the **Certificate of Service** evidencing service of **PECO Energy Company's Responses to the following Interrogatories**:

1. **Tenant Union Representative Network and Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania, Set III, Question Nos. 8, 23, 25-28 and 30**

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

If you have any questions, please contact me directly at 215.963.5384.

Very truly yours,



Kenneth M. Kulak

KMK/nt

Enclosure

c: Certificate of Service (w/encls.)

Morgan, Lewis & Bockius LLP

2222 Market Street
Philadelphia, PA 19103-3007
United States

DB1/ 148139928.1

 +1.215.963.5000
 +1.215.963.5001

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC
UTILITY COMMISSION**

v.

**PECO ENERGY COMPANY –
ELECTRIC DIVISION**

:
:
:
:
:
:
:

DOCKET NO. R-2024-3046931

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, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1923
OCAELECPECO2024@paoca.org
*Counsel for Office of Consumer
Advocate (“OCA”)*

*Carrie B. Wright
Prosecutor
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
carwright@pa.gov
*Counsel for Bureau of Investigation
& Enforcement*

*Sharon E. Webb
*Rebecca Lyttle
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov
relyttle@pa.gov
*Counsel for Office of Small Business
Advocate (“OSBA”)*

*Charis Mincavage
*Adeolu A. Bakare
*Brigid Landy Khuri
Rebecca Kimmel
McNees Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17108-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
bkhuri@mcneeslaw.com
rkimmel@mcneeslaw.com
*Counsel for Philadelphia Area Industrial
Energy Users Group (“PAIEUG”)*

*Robert A. Weishaar, Jr.
McNees Wallace & Nurick LLC
1200 G Street, NW, Suite 800
Washington, DC 20005
bweishaar@mcneeslaw.com
*Counsel for The National Railroad
Passenger Corporation ("Amtrak")*

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

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

*William Lesser
Cozen O'Connor
3 WTC
175 Greenwich Street, 55th Floor
New York, NY 10007
wlesser@cozen.com
Counsel for Electrify America, LLC

*Kenneth R. Stark
McNees Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17101
kstark@mcneeslaw.com
Counsel for Amtrak

Nicholas J. Enoch
Lubin & Enoch, P.C.
349 North 4th Avenue
Phoenix, AZ 85003-1505
nick@lubinandenoach.com
Counsel for IBEW Local 614

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

*Stephen Bright
*Jigar Shah
*Rhiannon Davis
Electrify America, LLC
1950 Opportunity Way, Suite 1500
Reston, VA 20190
steve.bright@electrifyamerica.com
jigar.shah@electrifyamerica.com
rhiannon.davis@electrifyamerica.com
Counsel for Electrify America, LLC

* Alan M. Seltzer
* John F. Povilaitis
Buchanan Ingersoll & Rooney PC
409 North Second Street, Suite 500
Harrisburg, PA 17101
alan.seltzer@bipc.com
john.povilaitis@bipc.com
*Counsel for Constellation Energy Generation,
LLC and Constellation NewEnergy, 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
jprice@clsphila.org
vpatel@clsphila.org
rballenger@clsphila.org
*Counsel for Tenant Union Representative
Network and Coalition for Affordable
Utility Services and Energy Efficiency in
Pennsylvania ("TURN and CAUSE-PA")*

* Laura Antinucci
* James Kellett
Philadelphia Law Department
1515 Arch Street, 16th Floor
Philadelphia, PA 19102
laura.antinucci@phila.gov
james.kellett@phila.gov
*Counsel for The City of Philadelphia and
Philadelphia Energy Authority
("City and PEA")*

* Phillip D. Demanchick Jr.
Hawke McKeon & Sniscak, LLP
100 North 10th Street
Harrisburg, PA 17101
pddemanchick@hmslegal.com
*Counsel for Grays Ferry Cogeneration
Partnership and Vicinity Energy
Philadelphia, Inc.*

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.

Bernice I. Corman
Bicky Corman Law, PLLC
1250 Connecticut Avenue, NW, Suite 700
Washington, DC 20036
bcorman@bickycormanlaw.com
Counsel for EVgo Services LLC

* C. Baird Brown
eco(n)law, LLC
230 South Broad Street, 17th Floor
Philadelphia, PA 19102
baird@eco-n-law.net
Counsel for PEA

Alan McCarthy
705 East Barnard Street
West Chester, PA 19382
alanmccarthy25@hotmail.com
Pro Se

CONSULTANTS / WITNESSES

*John DeFever
Larkin & Associates, PLLC
15728 Farmington Road
Livonia, MI 48154
OCAELECPECO2024@paoca.org
Witness for OCA

*David Garrett
Resolve Utility Consulting PLLC
101 Park Avenue, Suite 1125
Oklahoma City, OK 73102
OCAELECPECO2024@paoca.org
Witness for OCA

*Nicholas A. DeMarco
Regulatory Analyst
Office of Consumer Advocate
555 Walnut Street
5th Floor – Forum Place
Harrisburg, PA 17101-1923
OCAELECPECO2024@paoca.org
Witness for OCA

*Christine Wilson
cswilson@pa.gov
Witness for I&E

*Esyan Sakaya
esakaya@pa.gov
Witness for I&E

Kevin C. Higgins
Courtney Higgins
Energy Strategies
111 East Broadway, Suite 1200
Salt Lake City, UT 84111
khiggins@energystrat.com
chiggins@energystrat.com
Consultant for OSBA

*Clarence Johnson
CJ Energy
3707 Robinson Avenue
Austin, TX 78722
OCAELECPECO2024@paoca.org
Witness for OCA

*Roger Colton
Fisher, Sheehan, & Colton
34 Warwick Road
Belmont, MA 02478
OCAELECPECO2024@paoca.org
Witness for OCA

*Ron Nelson
Volt-Watt Consulting LLC
1311 SE 53rd Avenue
Portland, OR 97215
OCAELECPECO2024@paoca.org
Witness for OCA

*DC Patel
dupatel@pa.gov
Witness for I&E

*Benedict Tarr
btarr@pa.gov
Witness for I&E

Jeffrey Pollock
Billie S. LaConte
J. Pollock, Inc.
14323 South Outer 40 Road
Suite 206N
Town and Country, MO 63017
jcp@jpollockinc.com
bsl@jpollockinc.com
Consultants for PAIEUG

*Elizabeth Marx
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
emarx@pautilitylawproject.org
Witness for TURN and CAUSE-PA

*Dominic McGraw
dominic.mcgraw@phila.gov
Witness for City and PEA

Emily Schapira
eschapira@philaenergy.org
Witness for City and PEA

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

*Elizabeth Lankenau
elizabeth.lankenau@phila.gov
Witness for City and PEA

*Nidhi Krishen
nidhi.krishen@phila.gov
Witness for City and PEA

James Glenn
IBEW Local 614
4613 West Chester Pike, Upper Level
Newtown Square, PA 19073
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
mark.lazaroff@morganlewis.com
catherine.vasudevan@morganlewis.com
brooke.mcglinn@morganlewis.com

Dated: June 11, 2024

Counsel for PECO Energy Company