

June 21, 2023

Michael A. Podskoch Esq.  
Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigations & Enforcement  
Commonwealth Keystone Building  
400 North Street  
P.O. Box 3265  
Harrisburg, PA 17101

**RE: Pennsylvania PUC v. PECO Energy Company**  
**Docket No. R-2024-3048767**

Dear Mr. Podskoch:

Enclosed please find PECO's Responses to the Bureau of Investigation and Enforcement's Set I discovery requests, along with attachments. Should you have any questions, please let me know. Thank you.

Very truly yours,

Shane P. Simon

SPS  
Encls.

CC: per attached Certificate of Service  
Secretary Rosemary Chiavetta (*via e-filing*, Correspondence and COS only)

## **CERTIFICATE OF SERVICE**

I, Shane P. Simon, Esquire, hereby certify that I am on this day serving copies of PECO's Responses to I&E Set I Discovery Requests upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

**Via e-filing**

Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265  
[rchiavetta@pa.gov](mailto:rchiavetta@pa.gov)  
(Correspondence & COS Only)

**Via Electronic Mail**

Melanie J. El Atieh, Esq.  
Emily A. Farren, Esq.  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor  
Forum Place  
Harrisburg, PA 17101-1923  
[melatieh@paoca.org](mailto:melatieh@paoca.org)  
[efarren@paoca.org](mailto:efarren@paoca.org)

**Via Electronic Mail**

Jo-Anne S. Thompson, Esq.  
Adeolu A. Bakare, Esq.  
Charis Mincavage, Esq.  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[jthompson@mcneeslaw.com](mailto:jthompson@mcneeslaw.com)

**Via Electronic Mail**

Steven C. Gray, Esquire  
Senior Attorney  
Assistant Small Business Advocate  
Office of Small Business Advocate  
300 North 2nd Street  
Suite 202  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

**Via Electronic Mail**

Michael A. Podskoch Esq.  
Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigations & Enforcement  
Commonwealth Keystone Building  
400 North Street  
P.O. Box 3265  
Harrisburg, PA 17101

**Via Electronic Mail**

Jack R. Garfinkle, Esq.  
Adesola Adegbesan, Esq.  
PECO Energy Company  
2301 Market Street  
23rd Floor  
Philadelphia, PA 19103  
[Jack.Garfinkle@exeloncorp.com](mailto:Jack.Garfinkle@exeloncorp.com)  
[Adesola.Adegbesan@exeloncorp.com](mailto:Adesola.Adegbesan@exeloncorp.com)

Dated: June 21, 2024

By: /s/ Shane P. Simon  
Shane P. Simon, Esquire  
PA Attorney No.: 319643