

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

July 22, 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 the Interrogatories of the Office of Consumer Advocate, Set 20, 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 eight (8) 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. McGlenn, Esquire  
Catherine G. Vasudevan, Esquire  
July 22, 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](mailto: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 PECEO Energy Company – Gas Division, Set 20, 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 22<sup>nd</sup> day of July 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*

Anthony E. Gay  
Jack R. Garfinkle  
Adesola K. Adegbesan  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103  
anthony.gay@exeloncorp.com  
jack.garfinkle@exeloncorp.com  
adesola.adegbesan@exeloncorp.com  
*Counsel for PECO Energy Co. - Gas*

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

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*

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*

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.mcglinn@morganlewis.com  
catherine.vasudevan@morganlewis.com  
*Counsel for PECO Energy Company*

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.*

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  
emarx@pautilitylawproject.org  
*Counsel for CAUSE-PA*

Charis Mincavage, Esq.  
Adeolu A. Bakare, Esq.  
Brigid Landy Khuri, Esq.  
Rebecca Kimmel  
McNEES ALLACE & NURICK LLC  
100 Pine Steet  
Harrisburg, PA 17108-1166  
cmincavage@mcneeslaw.com  
abakare@mcneeslaw.com  
bkhuri@mcneeslaw.com  
kstark@mcneeslaw.com  
rkimmel@mcneeslaw.com

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*

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

/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: July 22, 2024