

# Morgan Lewis

**Kenneth M. Kulak**

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

July 29, 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-referenced matter is the **Certificate of Service** evidencing service of **PECO Energy Company's Responses to the following Interrogatories**:

**1. Office of Consumer Advocate, Set XIX, Question Nos. 1-11**

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/ap

Enclosures

c: 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

# Morgan Lewis

**Kenneth M. Kulak**

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

July 29, 2024

**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

**Re: Pennsylvania Public Utility Commission v.  
PECO Energy Company - Gas Division  
Docket No. R-2024-3046932**

Dear Counsel:

Enclosed please find in the above-referenced matter **PECO Energy Company's Responses to the Interrogatories of the Office of Consumer Advocate, Set XIX, Question Nos. 1-11.**

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

Very truly yours,



Kenneth M. Kulak

KMK/ap  
Enclosures

c: 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 forgoing 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  
Rebecca Kimmel  
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)  
[rkimmel@mcneeslaw.com](mailto:rkimmel@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)*

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")*

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.*

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

\*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")*

Nicholas J. Enoch  
Lubin & Enoch, P.C.  
349 North 4<sup>th</sup> Avenue  
Phoenix, AZ 85003-1505  
[nick@lubinandenoach.com](mailto:nick@lubinandenoach.com)  
*Counsel for IBEW Local 614*

\*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")*

## 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  
\*Mark Ewen  
Industrial Economics, Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[rdk@indecon.com](mailto:rdk@indecon.com)  
[mewen@indecon.com](mailto:mewen@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 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*

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



---

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: July 29, 2024

*Counsel for PECO Energy Company*