

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 please find, in the above-referenced matter the **Certificate of Service** evidencing service upon the parties of record of the **Objections of PECO Energy Company to the Interrogatories of Local 614 of the International Brotherhood of Electrical Workers, AFL-CIO**.

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.)

**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 **Objections of PECO Energy Company to the Interrogatories of Local 614 of the International Brotherhood of Electrical Workers, AFL-CIO** on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

*The Honorable Marta Guhl
Administrative Law Judge
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
801 Market Street, Suite 4063
Philadelphia, PA 19107
mguhl@pa.gov

*The Honorable Darlene Heep
Administrative Law Judge
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
801 Market Street, Suite 4063
Philadelphia, PA 19107
dheep@pa.gov

*Erin L. Gannon
*Barrett C. Sheridan
*Gina L. Miller
*Jacob D. Guthrie
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1923
egannon@paoca.org
bsheridan@paoca.org
[gmiller@paoca.org](mailto:gmilller@paoca.org)
jguthrie@paoca.org
OCAGASPECO2024@paoca.org
*Counsel for Office of Consumer
Advocate (“OCA”)*

*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
*Counsel for Bureau of Investigation
& Enforcement (“BI&E”)*

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

*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)*

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”)*

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.

*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”)*

*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”)*

Nicholas J. Enoch
Lubin & Enoch, P.C.
349 North 4th Avenue
Phoenix, AZ 85003-1505
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
jprice@clsphila.org
vpatel@clsphila.org
rballenger@clsphila.org
Counsel for Coalition for Affordable

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
johndefever@yahoo.com
Witness for OCA

*Clarence Johnson
CJ Energy
3707 Robinson Avenue
Austin, TX 78722
cjenergyconsult@att.net
Witness for OCA

*David Garrett
Resolve Utility Consulting PLLC
101 Park Avenue, Suite 1125
Oklahoma City, OK 73102
dgarrett@resolveuc.com
Witness for OCA

*Roger Colton
Fisher, Sheehan, & Colton
34 Warwick Road
Belmont, MA 02478
roger@fcsonline.com
Witness for OCA

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

*Ron Nelson
Volt-Watt Consulting LLC
1311 SE 53rd Avenue
Portland, OR 97215
ron.nelson@voltwattconsulting.com
Witness for OCA

*Anthony Spadaccio
aspadaccio@pa.gov
Witness for BI&E

*Christopher Keller
chrkeller@pa.gov
Witness for BI&E

*Ethan Cline
etcline@pa.gov
Witness for BI&E

*Martin Salamonski
msalamonsk@pa.gov
Witness for BI&E

Robert D. Knecht
*Mark Ewen
Industrial Economics, Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
rdk@indecon.com
mewen@indecon.com
Consultant for OSBA

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 CAUSE-PA

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

Dated: July 29, 2024

Counsel for PECO Energy Company