



COMMONWEALTH OF PENNSYLVANIA

August 2, 2024

The Honorable Darlene Heep  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

The Honorable Marta Guhl  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

**Re: Pennsylvania Public Utility Commission v. PECO Energy Company –  
Electric Division / Docket No. R-2024-3046931**

Dear Judge Heep and Judge Guhl:

Enclosed please find the Surrebuttal Testimony of Kevin C. Higgins, labelled OSBA Statement No. 1-S, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Sharon E. Webb*

Sharon E. Webb  
Assistant Small Business Advocate  
Attorney ID No. 73995

*Enclosures*

cc: PA PUC, Secretary, Rosemary Chiavetta (Cover Letter and Certificate of Service Only)  
Kevin C. Higgins  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission** :  
 :  
 v. : **Docket No. R-2024-3046931**  
 :  
**PECO Energy Company– Electric Division** :

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Darlene Heep  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
[dheep@pa.gov](mailto:dheep@pa.gov)  
[sdelvillar@pa.gov](mailto:sdelvillar@pa.gov)

The Honorable Marta Guhl  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
[mguhl@pa.gov](mailto:mguhl@pa.gov)

Carrie B. Wright, Esquire  
Bureau of Investigation & Enforcement  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[carwright@pa.gov](mailto:carwright@pa.gov)

Anthony E. Gay, Esquire  
Jack R. Garfinkle, Esquire  
Adesola K Adegbesan, Esquire  
Richard Webster, Esquire  
Caroline S. Choi, Esquire  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103  
[anthony.gay@exeloncorp.com](mailto:anthony.gay@exeloncorp.com)  
[jack.garfinkle@exeloncorp.com](mailto:jack.garfinkle@exeloncorp.com)  
[adesola.adegbesan@exeloncorp.com](mailto:adesola.adegbesan@exeloncorp.com)  
[dick.webster@exeloncorp.com](mailto:dick.webster@exeloncorp.com)  
[caroline.choi@exeloncorp.com](mailto:caroline.choi@exeloncorp.com)

Erin L. Gannon, Esquire  
Gina L. Miller, Esquire  
Barret Sheridan, Esquire  
Jacob D. Guthrie, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923  
[OCAelecPECO2024@paoca.org](mailto:OCAelecPECO2024@paoca.org)

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](mailto:ken.kulak@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)

Charlotte E. Edelstein, Esquire  
Joline R. Price, Esquire  
Vikram A. Patel, Esquire  
Robert W. Ballenger, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
[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)

Charles T. Joyce, Esquire  
Samuel E. Shopp, Esquire  
SPEAR WILDERMAN, P.C.  
230 South Broad Street  
Suite 1650  
Philadelphia, PA 19102s  
[ctjoyce@spearwilderman.com](mailto:ctjoyce@spearwilderman.com)  
[sshopp@spearwilderman.com](mailto:sshopp@spearwilderman.com)

Nicholas J. Enoch, Esquire  
LUBIN & ENOCH, P.C.  
349 North 4th Avenue  
Phoenix, AZ 85003  
[nick@lubinandenoch.com](mailto:nick@lubinandenoch.com)

Charis Mincavage, Esquire  
Adeolu A. Bakare, Esquire  
Brigid Landy Khuri, Esquire  
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)

Robert A. Weishaar, Jr., Esquire  
McNees Wallace & Nurick, LLC  
1200 G Street, NW, Suite 800  
Washington, DC 20005  
[rweishaa@mw.com](mailto:rweishaa@mw.com)

Steven Wing-Kern Lee, Esquire  
Barry A. Naum, Esquire  
Derrick P. Williamson, Esquire  
Spilman, Thomas & Battle, PLLC  
1100 Bent Creek Blvd.  
Suite 101  
Mechanicsburg, PA 17050  
[SLee@Spilmanlaw.com](mailto:SLee@Spilmanlaw.com)  
[BNaum@Spilmanlaw.com](mailto:BNaum@Spilmanlaw.com)  
[DWilliamson@spilmanlaw.com](mailto:DWilliamson@spilmanlaw.com)

Alan McCarthy  
705 E Barnard Street  
West Chester, PA 19382  
[Alanmccarthy25@hotmail.com](mailto:Alanmccarthy25@hotmail.com)

Laura Antinucci, Esquire  
Philadelphia Law Dept  
1515 Arch Street  
16<sup>th</sup> Floor  
Philadelphia, PA 19102  
[Laura.antinucci@phila.gov](mailto:Laura.antinucci@phila.gov)

Bernice I. Corman, Esquire  
Bicky Corman Law  
1250 Connecticut Avenue  
NW #700  
Washington, DC 20036  
[bcorman@bickycormanlaw.com](mailto:bcorman@bickycormanlaw.com)

Todd S. Stewart, Esquire  
Phillip D. Demanchick, Jr.  
Hawke McKeon & Sniscak, LLP  
100 N. Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
[pddemanchick@hmslegal.com](mailto:pddemanchick@hmslegal.com)

William Lesser, Esquire  
Cozen O'Connor  
3 WTC  
175 Greenwich Street, 55<sup>th</sup> Floor  
New York, NY 10007  
[wlesser@cozen.com](mailto:wlesser@cozen.com)

Jonathan Nase, Esquire  
David P. Zambito, Esquire  
Cozen O'Connor  
17 North Second Street  
Suite 1410  
Harrisburg, PA 17101  
[jnase@cozen.com](mailto:jnase@cozen.com)  
[dzambito@cozen.com](mailto:dzambito@cozen.com)

C. Baird Brown, Esquire  
ECO(N)LAW LLC  
230 S Broad Street  
17<sup>th</sup> Floor  
Philadelphia, PA 19102  
[baird@eco-n-law.net](mailto:baird@eco-n-law.net)

Alan Seltzer, Esquire  
John F. Polvilaitis, Esquire  
Buchanan Ingersoll & Rooney  
409 N Second Street, Suite 500  
Harrisburg, PA 17101-1357  
[Alan.seltzer@bipc.com](mailto:Alan.seltzer@bipc.com)  
[John.povilaitis@bipc.com](mailto:John.povilaitis@bipc.com)

Stephen Bright, Esquire  
Electrify America, LLC  
1950 Opportunity Way  
Suite 1500  
Reston, VA 20190  
[Steve.Bright@electrifyamerica.com](mailto:Steve.Bright@electrifyamerica.com)

DATE: August 2, 2024

/s/ Sharon E. Webb

Sharon E. Webb  
Assistant Small Business Advocate  
Attorney I.D. No. 73995