



City of Philadelphia

LAW DEPARTMENT
One Parkway
1515 Arch Street
17th Floor
Philadelphia, PA 19102

September 12, 2024

VIA ELECTRONIC MAIL

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

RE: Pennsylvania Public Utility Commission v.
PECO Energy Company (Electric);
Docket No. R-2024-3046931

City of Philadelphia and Philadelphia Energy Authority
Letter Re: Not Filing Reply Brief

Your Honors:

Please consider this letter notice that the City of Philadelphia and Philadelphia Energy Authority will not be submitting a Reply Brief in the above-captioned matter. Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact me at the below email address.

Respectfully submitted,

/s/Laura Antinucci
Laura Antinucci
Counsel for the CITY
Philadelphia Law Department
1515 Arch Street, 16th Floor
Philadelphia, PA 19102
Laura.Antinucci@phila.gov

cc: Rosemary Chiavetta, Secretary (via electronic filing Letter and COS only)
Athena Devillar, Legal Assistant (via electronic mail – sdevillar@pa.gov)
Per Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3046931, <i>et al.</i>
	:	
PECO Energy Company	:	
- Electric Division	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this 12th day of September 2024, served a true copy of the Letter Re: Not Filing Reply Brief of the City of Philadelphia and Philadelphia Energy Authority on the parties, listed below in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

Served via Electronic Mail Only

Anthony E. Gay, Esq.
Jack R. Garfinkle, Esq.
Jennedy S. Johnson, Esq.
Caroline Choi, Esq.
PECO Energy Company
2301 Market Street Philadelphia, PA 19103
anthony.gay@exeloncorp.com
jack.garfinkle@exeloncorp.com
jennedy.johnson@exeloncorp.com
caroline.choi@exeloncorp.com
(*Counsel for PECO Energy Co.*)

Kenneth M. Kulak, Esq.
Mark A. Lazaroff, Esq.
Brooke E. McGlinn, Esq.
Catherine G. Vasudevan, Esq.
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 Co.*)

Sharon E. Webb, Esq.
Rebecca Lyttle, Esq.
Office of Small Business Advocate
Forum Place 555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov
relyttle@pa.gov
(*Counsel for Office of Small Business Advocate*)

Erin L. Gannon, Esq.
Gina L. Miller, Esq.
Jacob D. Guthrie, Esq.
Barrett C. Sheridan, Esq.
Office of Consumer Advocate Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
egannon@paoca.org
gmiller@paoca.org
jguthrie@paoca.org
bsheridan@paoca.org
OCAELECPECO2024@paoca.org
(*Counsel for Office of Consumer Advocate*)

Carrie B. Wright, Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street Harrisburg, PA 17120
carwright@pa.gov
(Counsel for Bureau of Investigation and Enforcement)

Charles T. Joyce
Samuel E. Shopp
SPEAR WILDERMAN, P.C.
230 South Broad Street, Ste. 1650
Philadelphia, PA 19102
ctjoyce@spearwilderman.com
sshopp@spearwilderman.com
(Counsel for IBEW Local 614)

Nicholas J. Enoch
LUBIN & ENOCH, P.C.
349 North 4th Avenue Phoenix, Arizona
85003-1505
nick@lubinandenoch.com
(Counsel for IBEW Local 614)

Vikram A. Patel, Esq.
vpatel@clsphila.org
Charlotte E. Edelstein, Esq.
cedelstein@clsphila.org
Joline R. Price, Esq.
jprice@clsphila.org
Robert W. Ballenger, Esq.,
rballenger@clsphila.org
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
(Counsel for TURN and CAUSE PA)

Derrick Price Williamson
Barry A. Naum
Steven W. Lee
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050 Phone: (717)

795-2740 Fax: (717) 795-2743
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
slee@spilmanlaw.com
(Counsel for Walmart)

BICKY CORMAN LAW, PLLC
1250 Connecticut Ave., NW, Suite 700
bcorman@bickycormanlaw.com
(Counsel for EVgo)

William A. Lesser, Esq.
Cozen O'Connor
3 WTC 175 Greenwich Street, 55th Floor
New York, NY 10007
wlesser@cozen.com
(Counsel for Electrify America, LLC)

Alan M. Seltzer
John F. Povilaitis
Buchanan Ingersoll & Rooney PC
409 N. Second Street, Suite 500 Harrisburg,
PA 17101
alan.seltzer@bipc.com
john.povilaitis@bipc.com
(Counsel for Constellation Energy
Generation, LLC and Constellation
NewEnergy, Inc.)

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

Phillip D. Demanchick, Jr., Esq.
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
pddemanchick@hmslegal.com
(Counsel for Grays Ferry Cogeneration
Partnership and Vicinty Energy
Philadelphia, Inc.)

Dated: September 12, 2024

/s/Laura Antinucci
Laura Antinucci, Esq.
PA Attorney I.D. #327217
James Kellett, Esq.
PA Attorney I.D. #319663
Counsel for the CITY
Philadelphia Law Department
1515 Arch Street, 16th Floor
Philadelphia, PA 19102

Baird Brown
PA Attorney I.D. #32749
Counsel for PEA
eco(n)law LLC
230 S. Broad Street
Philadelphia, PA 19102