



Todd S. Stewart
717.703.0800
tsstewart@hmslegal.com

Regulation is a maze. We can show you the way!

501 Corporate Circle, Suite 302, Harrisburg, PA 17110 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

October 28, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Interstate Gas Supply, LLC; Docket Nos. A-2011-2228643; Utility Code: 1113238;
**AMENDED RESPONSE OF INTERSTATE GAS SUPPLY, LLC TO DATA
REQUEST OF THE STAFF**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Amended Data Response of Interstate Gas Supply, LLC d/b/a IGS Energy to the Data Request No. 1 of the Staff in the above-referenced matter.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Todd S. Stewart", is written over a large, stylized blue scribble.

Todd S. Stewart
*Counsel for Interstate Gas Supply, LLC d/b/a
IGS Energy*

TSS/jld

Enclosure

cc: Jeff McCracken, Bureau of Technical Utility Services (via email – jmccracken@pa.gov)
Lauren Wolfe (via email – lauren.wolfe@igs.com)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA FIRST-CLASS MAIL

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
1 UGI Drive
Denver, PA 17517

Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101

Duquesne Light Company
Regulatory Affairs
411 Seventh Street, MD 16-4
Pittsburg, PA 15219

Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

Pike County Light & Power Company
Vice President-Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

Office of Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

Citizens Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Department of Revenue
Bureau of Compliance
PO Box 281230
Harrisburg, PA 17128-1230

PECO Energy Company
Manager Energy Acquisition
2301 Market Street
Philadelphia, PA 19101-8699

West Penn Power d/b/a Allegheny Power
Legal Department
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Wellsboro Electric Company
Attn: EGS Coordinator
33 Austin Street
PO Box 138
Wellsboro, PA 16901

FirstEnergy
Legal Department
2800 Pottsville Pike
Reading, PA 19612

VIA ELECTRONIC MAIL

Carol Scanlon
Peoples Natural Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
Carol.Scanlon@peoples-gas.com

Carol Scanlon
Peoples Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
Carol.Scanlon@peoples-gas.com

Joanne E. Maciok
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6363 Main Street
Williamsville, NY 14221
maciokij@natfuel.com

Mr. Ryan Reeves, Director Supply
Transportation & Control
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122
pgwchoicesupply@pgworks.com

Columbia Gas of PA, Inc.
Transport Support Services
290 W. Nationwide Blvd.
Columbus, OH 43215
transportevaluations@nisource.com

Sherry Epler
UGI Utilities, Inc. – Gas Division
1 UGI Drive
Denver, PA 17517
sepler@ugi.com

Ed Rogers
Valley Energy Inc.
523 South Keystone Avenue
Sayre, PA 18840-0340
erogers@ctenterprises.org

Carlos Thillet
Manager, Gas Supply and Transportation
PECO
2301 Market Street, S9-2
Philadelphia, PA 19103
Carlos.thillet@exeloncorp.com



Todd S. Stewart

DATED: October 28, 2024

**AMENDED RESPONSE OF INTERSTATE GAS SUPPLY, LLC
TO DATA REQUEST NO. 1
OF THE STAFF**

Docket No. A-2011-2228643

1. Reference Application, Section 6.a and 6.b, Certificate of Service – Applicant is required to provide a Certificate of Service showing proof of service of this amendment (template attached) on the five statutory agencies and all electric distribution companies in which the licensee is licensed to operate. Please provide this documentation.

RESPONSE:

Attached is a copy of the amended filing made by IGS at this docket on September 5, 2024, seeking to change its name and an amended Certificate of Service indicating that the filing has been served on all required parties.

Provided by: Counsel



Regulation is a maze. We can show you the way!

Todd S. Stewart
717.703.0806
tsstewart@hmslegal.com

501 Corporate Circle, Suite 302, Harrisburg, PA 17110 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

September 5, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (Filing Room)
Harrisburg, PA 17120

RE: Interstate Gas Supply, LLC; Docket Nos. A-125051; A-2011-2228643;
**AMENDED NOTICE OF MATERIAL CHANGE AND REQUEST FOR
NAME CHANGE**

Dear Secretary Chiavetta:

The purpose of this letter is to amend the notice of material change and request for change, provided to the Commission on August 23, 2024.¹ The initial filing requested to change the name of Interstate Gas Supply, Inc, to Interstate Gas Supply, LLC. The notice referenced that IGS is a licensed Natural Gas Supplier as well as a licensed Electric Generation Supplier but noted only the docket of the Natural Gas Supplier Licensed in the caption. This letter addresses that oversight to include the dockets for each. This request is to change the information provided to the Commission in Interstate Gas Supply, Inc.'s initial Application for Electric Generation Supplier ("EGS") and Natural Gas Supplier ("NGS") licenses, and any subsequent notifications, and to include IGS' electric and Gas supplier license information to ensure that the corporate form and name for both entities is changed. IGS' initial notice informed the Commission that the corporate form of IGS had changed from that of a corporation, with the designation "Inc." to a limited liability company, with the designation "LLC". The change of that designation as part of its corporate name will be the only noticeable change. As a consequence of the change in form, IGS requests that the Commission change its name on all Commission records and issue new supplier

¹ Pursuant to the requirements of 52 Pa. Code § 62.105.

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
September 5, 2024
Page 2

licenses with the new designation. An additional filing fee of \$350 for the electric license change has been paid electronically.

There have been no subsequent material changes to the corporate structure or operation of IGS relevant to its EGS or NGS licenses other than those noted herein. If there are questions concerning this notification, please direct them to the undersigned counsel.

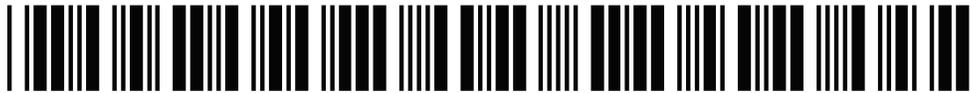
Very truly yours,



Todd S. Stewart
Counsel for Interstate Gas Supply, LLC

TSS/das
Enclosures

APPENDIX A



| DATE | DOCUMENT ID | DESCRIPTION | FILING | EXPED | CERT | COPY |
|------------|--------------|-------------------------------------|--------|--------|------|------|
| 12/30/2022 | 202236303532 | Conversion Within SOS Records (CVS) | 99.00 | 100.00 | 0.00 | 0.00 |

Receipt

This is not a bill. Please do not remit payment.

TAFT STETTINIUS & HOLLISTER LLP
200 PUBLIC SQUARE
STE 3500
CLEVELAND, OH 44114-2302

**STATE OF OHIO
CERTIFICATE**

Ohio Secretary of State, Frank LaRose
754636

It is hereby certified that the Secretary of State of Ohio has custody of the business records for
INTERSTATE GAS SUPPLY, LLC

and, that said business records show the filing and recording of:

Document(s)

Conversion Within SOS Records

CHANGE BUSINESS TYPE OH LLC

Document No(s):

202236303532

Effective Date: 01/01/2023



United States of America
State of Ohio
Office of the Secretary of State

Witness my hand and the seal of the
Secretary of State at Columbus, Ohio this
30th day of December, A.D. 2022.

Ohio Secretary of State

Form 700 Prescribed by:



Telephone: 877.767.3453

OhioSoS.gov | business@OhioSoS.gov

File online or for more information: OhioBusinessCentral.gov

Certificate for Conversion for Entities Converting Within or Off the Records of the Ohio Secretary of State

Filing Fee: \$99
Form Must Be Typed

(CHECK ONLY ONE (1) BOX)

(1) **Converting Within The Records of the Ohio Secretary of State**

(2) **Converting Off The Records of the Ohio Secretary of State** (187-VXX)

Name of the converting entity

INTERSTATE GAS SUPPLY, INC.

Jurisdiction of Formation

OHIO

Charter/Registration Number

754636

The converting entity is a:
(Check Only (1) One Box)

Domestic Nonprofit Corporation

Domestic For-Profit Corporation

Foreign Nonprofit Corporation

Foreign For-Profit Corporation

Domestic Limited Liability Company

Foreign Limited Liability Company

Partnership

Domestic Limited Partnership

Foreign Limited Partnership

Domestic Limited Liability Partnership

Foreign Limited Liability Partnership

The converting entity hereby states that it has complied with all laws in the jurisdiction under which it exists and that those laws permit the conversion.

Name of the converted entity

Jurisdiction of Formation

The converted entity is a:
(Check Only (1) One Box)

Domestic For-Profit Corporation
 Domestic Professional Association
 If Domestic For-Profit Corporation **OR** Domestic Professional Association, please indicate total number of shares

Foreign Nonprofit Corporation
 Foreign For-Profit Corporation
 Domestic Limited Liability Company
 Foreign Limited Liability Company

Partnership
 Domestic Limited Partnership
 Foreign Limited Partnership
 Domestic Limited Liability Partnership
 Foreign Limited Liability Partnership

Effective Date **(Optional)** (The conversion is effective upon the filing of this certificate or on a later date specified in the certificate)

Name and address of the person or entity that will provide a copy of the declaration of conversion upon written request.

Name

Mailing Address

City State Zip Code

Required information that must accompany conversion certificate if box 2 is checked

If the converting entity is a domestic or foreign entity that will not be licensed in Ohio, provide the name and address of the statutory agent upon whom any process, notice or demand may be served.

Name of Statutory Agent

Mailing Address

City State ZIP Code

See instructions for additional filing requirements if

- (1) the conversion creates a new domestic entity,
- (2) the converted entity is a foreign entity that desires to transact business in Ohio; or
- (3) if a domestic corporation or foreign corporation licensed in Ohio is the converting entity.

By signing and submitting this form to the Ohio Secretary of State, the undersigned hereby certifies that he or she has the requisite authority to execute this document.

Required

Must be signed by an authorized representative.

/s/ Amy Gilmore

Signature

By (if applicable)

Amy Gilmore, Chief Financial Officer

Print Name

Signature

By (if applicable)

Print Name

Signature

By (if applicable)

Print Name

Complete the information in this section.

AFFIDAVIT

In lieu of dissolution releases from various governmental authorities.

Interstate Gas Supply, Inc. Name of Corporation

The undersigned, being first duly sworn, declares that on the dates indicated below, each of the named state governmental agencies was advised IN WRITING of the scheduled date of filing of the Certificate and was advised IN WRITING of the acknowledgement by the corporation of the applicability of the provisions of section 1701.95 of the ORC.

| | |
|---|--|
| <p>Agency Ohio Bureau of Workers' Compensation 30 W. Spring Street Columbus, Ohio 43215</p> <p>Date Notified (MM/DD/YYYY) 12/29/2022</p> <p><small>* Only required for domestic for-profit corporations</small></p> | <p>Agency Ohio Job & Family Services Status and Liability Section Data Correspondence Control Fax: 614-752-4811 Phone: 614-466-2319</p> <p>Overnight Address: P.O. Box 182413 Columbus, OH 43218-2413</p> <p>Regular Address: P.O. Box 182413 Columbus, OH 43218-2413</p> |
| <p>Agency Ohio Department of Taxation Taxpayer Services/Tax Release Unit P.O. Box 182382 Columbus, OH 43218-2382 Dissolution@tax.state.oh.us</p> <p>Date Notified (MM/DD/YYYY) <input type="text"/></p> <p><small>* Complete this date notified field only if the corporation is a domestic non-profit corporation or foreign corporation. * Note: Domestic for-profit corporations must submit with this filing a Certificate of Tax Clearance issued by the Ohio Department of Taxation.</small></p> | <p><input type="checkbox"/> The corporation is not required to pay or the department of taxation has not assessed any personal property tax.</p> |

Note: This affidavit must be signed by one or more persons executing the certificate or by an officer of the corporation.

Signature Title

Name

Mailing Address

City State ZIP Code

Seal



Sworn to and subscribed in my presence on this date (MM/DD/YYYY)

Notary Public

Date Commission Expires (MM/DD/YYYY)

AFFIDAVIT OF PERSONAL PROPERTY

State of

County of

Name of Officer

Title of Officer

of
Name of Corporation

and that this affidavit is made in compliance with Ohio Revised Code Section

That above-named corporation: (Check one (1) of the following)

- Has no personal property in any county in Ohio
- Is the type required to pay personal property taxes to state authorities only
- Has personal property in the following county (ies)

County

County

County

Signature

Title

Sworn to and subscribed in my presence on this date (MM/DD/YYYY)



Notary Public

Date Commission Expires (MM/DD/YYYY)

Form 610 Prescribed by:



Telephone: 877.767.3453

OhioSoS.gov | business@OhioSoS.gov

File online or for more information: OhioBusinessCentral.gov

Articles of Organization for a Domestic Limited Liability Company

Filing Fee: \$99

Form Must Be Typed

115-LCA

Name of Limited Liability Company

(Name must include one of the following words or abbreviations: "limited liability company", "limited", "LLC", "L.L.C.", "Ltd.", or "Ltd".)

Optional: Effective Date (MM/DD/YYYY)

Effective Time

Pursuant to Ohio Revised Code Section 1706.16(D), a limited liability company is formed when the articles of organization are filed by the secretary of state or at any later date or time specified in the articles of organization. Pursuant to Ohio Revised Code Section 1706.172(D), articles of organization delivered to the Ohio Secretary of State for filing may specify an effective time and a delayed effective date of not more than ninety days following the date of receipt by the Secretary of State. Articles of organization are effective as provided in Ohio Revised Code Section 1706.172(D).

Optional: Purpose

Original Appointment of Statutory Agent

The undersigned authorized member(s), manager(s) or representative(s) of

Interstate Gas Supply, LLC

(Name of Limited Liability Company)

hereby appoint the following to be Statutory Agent upon whom any process, notice or demand required or permitted by statute to be served upon the limited liability company may be served. The complete address of the agent is:

Taft Service Solutions Corp.

(Name of Statutory Agent)

425 Walnut St., Suite 1800

(Mailing Address)

Cincinnati

(Mailing City)

Ohio

(Mailing State)

45202

(Mailing ZIP Code)

Acceptance of Appointment

The Undersigned, Taft Service Solutions Corp., named herein as the
(Name of Statutory Agent)

Statutory agent for Interstate Gas Supply, LLC
(Name of Limited Liability Company)

hereby acknowledges and accepts the appointment of statutory agent for said limited liability company.

Statutory Agent Signature David Tavolier, Assistant Secretary
(Individual Agent's Signature / Signature on Behalf of Business Serving as Agent)

If applicable, attach a statement as provided in division (B)(3) of section 1706.761 of the Ohio Revised Code to state that the LLC may have one or more series of assets subject to limitations.

By signing and submitting this form to the Ohio Secretary of State, the undersigned hereby certifies that he or she has the requisite authority to execute this document.

Required

Articles of Organization shall be signed by at least one person.

If the person is an individual, then he or she must sign on the "signature" line and print his or her name in the "Print Name" Box.

If the person is a business entity, please print the name of the entity in the "Signature" box and an authorized representative of the business must sign in the "By" box and print his or her name and title or authority in the "Print Name Box."

/s/ Amy Gilmore

Signature

By (if applicable)

Amy Gilmore, Chief Financial Officer

Print Name

Signature

By (if applicable)

Print Name

Signature

By (if applicable)

Print Name



PO Box 182382
Columbus, OH 43218-2382
tax.ohio.gov



CARYN KAUFMAN
TAFT STETTINIUS HOLLISTER LLP
41 SOUTH HIGH ST STE 1800
COLUMBUS, OH 43215
USA

December 14, 2022
Contact ID: 7183830823

RE: Certificate of Tax Clearance
Entity Name: Interstate Gas Supply, Inc.
Ohio Charter #: 00754636
Certificate Issue Date: 12/14/2022

Up to and including the certificate issue date, all taxes administered by the Tax Commissioner have been filed and paid in full.

This certificate does not preclude the Department from issuing a bill and/or assessment, for any tax returns and/or tax liabilities and fees becoming due, after the certificate issue date. Also, this certificate does not preclude the Department from examining or auditing any period.

This Certificate of Tax Clearance is valid for thirty (30) days after issuance. The Ohio Secretary of State requires it to be submitted with their prescribed forms.

A handwritten signature in black ink, appearing to read "Jeffrey A. McClain".

Jeffrey A. McClain
Tax Commissioner

If responding to this notice, please use one of the following options:

- **Electronically:** Online Notice Response Service (ONRS) at gateway.ohio.gov or tax.ohio.gov/ONRS
- **Email:** Dissolution@tax.state.oh.us
- **eFax:** 1-206-984-0378
- **Mail:** Ohio Department of Taxation, PO Box 182382, Columbus, OH 43218-2382

Please contact the Department with any questions.

Tax Release Unit
Phone: 1-855-995-4422
TTY/TDD: 1-800-750-0750

APPENDIX B



Pennsylvania Department of State
Bureau of Corporations and Charitable Organizations
PO Box 8722 | Harrisburg, PA 17105-8722
T: 717.787.1057
dos.pa.gov/BusinessCharities

February 27, 2023

CT Corporation System
600 NORTH SECOND STREET, SUITE 401
HARRISBURG, PA 17101

Entity Name: Interstate Gas Supply, LLC
Amendment Date: February 27, 2023
Amendment Number: 0012890278
Amendment Type: Transfer of Foreign Registration

The Bureau of Corporations and Charitable Organizations is happy to send your filed document. The Bureau is here to serve you and we would like to thank you for doing business in Pennsylvania.

Beginning in 2024, annual reports are required for all domestic filing entities, limited liability general partnerships and registered foreign associations. More information will be forthcoming from the Bureau. However, to ensure that you receive notice of how and when to make annual reports, keep all information on file with the Bureau up-to-date, particularly registered office address.



0012890278



COMMONWEALTH OF PENNSYLVANIA
 Department of State
 Bureau of Corporations and Charitable Organizations
 PO Box 8722
 Harrisburg, Pennsylvania 17105-8722
TRANSFER OF FOREIGN REGISTRATION
 Fee: \$70

Pennsylvania Department of State

-FILED-

Amendment #: 0012890278
 Date Filed: 2/27/2023

B0539-2845 02/27/2023 7:55 AM Received by Pennsylvania Department of State

| | | |
|--|---|------------|
| DSCB:15- 418 (rev. 2/2017) | | |
| In compliance with the requirements of the applicable provisions of <u>15 Pa.C.S. § 418</u> (relating to transfer of registration), the undersigned registered foreign association hereby states that: | | |
| Current Foreign Business Type | | |
| File Number | 0002907789 | |
| Current Name | INTERSTATE GAS SUPPLY, INC. | |
| Filing Type | Foreign Business Corporation | |
| Current Jurisdiction | OHIO | |
| Filing Type After Transfer | | |
| Select the type of association after the merger or conversion | Foreign Limited Liability Company | |
| Type of limited liability company | Limited Liability Company | |
| Home Jurisdiction After Transfer | | |
| Jurisdiction of Formation | OHIO | |
| Effective Date | | |
| The filing shall be effective when filed with the Department of State | | |
| Name After Transfer | | |
| The full and proper name of the foreign association as registered in its home jurisdiction is | Interstate Gas Supply, LLC | |
| Business name in PennsylvaniaA3 | Interstate Gas Supply, LLC | |
| The street address of the association's principal office. | | |
| Current Principal Office Address | None | |
| The mailing address of the association's principal office. | | |
| Current Mailing Address | None | |
| Home Jurisdiction Addresses | | |
| Select one | The association's home jurisdiction does not require the association to maintain a street and mailing address in that jurisdiction. | |
| Current Registered Office or Commercial Registered Office Provider | | |
| Search for Commercial Registered Office Provider (CROP) | CT Corporation System Commercial Registered Office Provider | |
| Venue and Publication County | Dauphin | |
| Electronic Signature | | |
| IN TESTIMONY WHEREOF, the undersigned registered foreign association has caused this Transfer of Foreign Registration to be signed by a duly authorized representative of the surviving or converted association | | |
| Full Name | Title | Date |
| Scott White | Authorized Person | 02/27/2023 |

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA FIRST-CLASS MAIL

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
1 UGI Drive
Denver, PA 17517

Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101

Duquesne Light Company
Regulatory Affairs
411 Seventh Street, MD 16-4
Pittsburg, PA 15219

Pennsylvania Public Utility Commission
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Commonwealth Keystone Building
400 North Street, 2 West
Harrisburg, PA 17120

Pike County Light & Power Company
Vice President-Energy Supply
Corning Natural Gas Holding Corporation
330 West William Street
Corning, NY 14830

Office of Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

Citizens Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Department of Revenue
Bureau of Compliance
PO Box 281230
Harrisburg, PA 17128-1230

PECO Energy Company
Manager Energy Acquisition
2301 Market Street
Philadelphia, PA 19101-8699

West Penn Power d/b/a Allegheny Power
Legal Department
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Wellsboro Electric Company
Attn: EGS Coordinator
33 Austin Street
PO Box 138
Wellsboro, PA 16901

FirstEnergy
Legal Department
2800 Pottsville Pike
Reading, PA 19612

VIA ELECTRONIC MAIL

Carol Scanlon
Peoples Natural Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
Carol.Scanlon@peoples-gas.com

Carol Scanlon
Peoples Gas Company LLC
375 North Shore Drive
Pittsburgh, PA 15212
Carol.Scanlon@peoples-gas.com

Joanne E. Maciok
National Fuel Gas Distribution Corp.
6363 Main Street
Williamsville, NY 14221
maciokij@natfuel.com

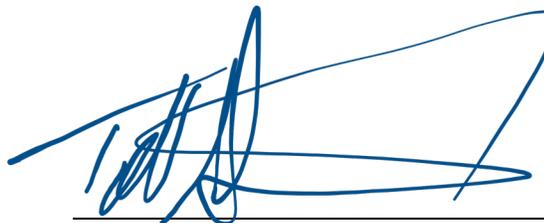
Mr. Ryan Reeves, Director Supply
Transportation & Control
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122
pgwchoicesupply@pgworks.com

Columbia Gas of PA, Inc.
Transport Support Services
290 W. Nationwide Blvd.
Columbus, OH 43215
transportevaluations@nisource.com

Sherry Epler
UGI Utilities, Inc. – Gas Division
1 UGI Drive
Denver, PA 17517
sepler@ugi.com

Ed Rogers
Valley Energy Inc.
523 South Keystone Avenue
Sayre, PA 18840-0340
erogers@ctenterprises.org

Carlos Thillet
Manager, Gas Supply and Transportation
PECO
2301 Market Street, S9-2
Philadelphia, PA 19103
Carlos.thillet@exeloncorp.com



Todd S. Stewart

DATED: October 25, 2024