



December 2, 2024

VIA EMAIL

The Honorable Eranda Vero
The Honorable Arlene Ashton
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street
Suite 4063
Philadelphia, PA 19107

Re: Petition of PECO Energy Company for Approval of Its Default Service Plan for the Period from June 1, 2025 Through May 31, 2029, Docket No. P-2024-3046008

Dear Judge Vero and Judge Ashton,

Please find enclosed Answer of the Energy Justice Advocates. Should you have any questions, please do not hesitate to contact me. Thank you.

Respectfully submitted,

/s/ Devin McDougall

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Supervising Senior Attorney

Earthjustice

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Counsel for the Energy Justice Advocates

cc:

Certificate of Service (w/ encl.) (via email)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for
Approval of Its Default Service Plan for the
Period from June 1, 2025 Through May 31,
2029

Docket No. P-2024-3046008

CERTIFICATE OF SERVICE

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

Service By Email Only

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Dated: December 2, 2024

/s/ Devin McDougall

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**ANSWER OF THE ENERGY JUSTICE ADVOCATES
IN SUPPORT OF THE PETITIONS
OF CAUSE-PA/TURN AND THE OFFICE OF CONSUMER ADVOCATE**

I. INTRODUCTION

Pursuant to 52 Pa. Code § 5.572(e), POWER Interfaith (“POWER”), Vote Solar, Clean Air Council, Sierra Club, Physicians for Social Responsibility, and PennEnvironment (the “Energy Justice Advocates”), by and through their counsel, submit this Answer (“Answer”) in Support of the Petitions for Reconsideration and/or Clarification (“Petitions”) that were filed by the Office of Consumer Advocate (“OCA”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania and the Tenant Union Representative Network (together, “CAUSE-PA/TURN”) in the above-captioned proceeding (the “Proceeding”) of the Pennsylvania Public Utility Commission (the “Commission”).

II. ANSWER

The Petitions request that the Commission reconsider the portion of its final order (“Order”) in this Proceeding that rejected the provisions of the Joint Petition for Non-Unanimous Settlement (the “Joint Petition”) in this Proceeding (to which the Energy Justice Advocates were a party) that revise PECO’s Standard Offer Program (“SOP”) and request that the Commission clarify various aspects of the Order relating to the SOP.

The Energy Justice Advocates strongly support the Petitions. The revisions of the SOP included in the Joint Petition are designed to protect consumers and mitigate affordability concerns raised by CAUSE-PA/TURN and OCA in this Proceeding. Protecting affordability is a key component of energy justice and is integrally related to the concerns raised in this Proceeding by the Energy Justice Advocates relating to an equitable transition to clean energy. The carefully-crafted terms of the Joint Petition, including the SOP revisions, strike the right balance between advancing affordability and consumer protection and maintaining the operation of the competitive market.

III. CONCLUSION

WHEREFORE, the Energy Justice Advocates respectfully request that the Commission grant the Petitions.

Dated: December 2, 2024

Respectfully submitted,
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