



August 28, 2025

VIA E-FILE

David P. Zambito

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Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor North
Filing Room
Harrisburg, PA 17120

Re: **Pennsylvania Public Utility Commission v. Energy Center Harrisburg LLC;
Docket No. R-2025-3055959**

**Response to Complaint of the Office of Consumer Advocate;
Formal Complaint Docket No. C-2025-3056995**

Dear Secretary Homsher:

Energy Center Harrisburg LLC ("ECH") is in receipt of the Formal Complaint filed by the Office of Consumer Advocate ("OCA") dated August 20, 2025, and served on ECH by the Secretarial Letter dated August 22, 2025, in the above-referenced proceeding. Pursuant to 52 Pa. Code § 5.61(d), in Commission-instituted rate proceedings, "an answer is not required except as may be directed by the Commission or the presiding officer." Accordingly, ECH does not intend to submit an answer to the Office of Consumer Advocate's Formal Complaint unless so directed. To the extent that an answer is required, ECH denies OCA's averments that ECH's base rate proposal is unjust, unreasonable, or otherwise contrary to the public interest.

If you have any questions regarding this filing, please direct them to me. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR

By: David P. Zambito
Counsel for **Energy Center Harrisburg LLC**

DPZ:kmg

cc: Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ENERGY CENTER HARRISBURG LLC :
(GENERAL RATE INCREASE FILED : Docket No. R-2025-3055959
PURSUANT TO 66 PA. C.S. § 1308, :
INCLUDING RESPONSES TO 52 PA. : Formal Complaint Docket No.
CODE § 53.52) : C-2025-3056995

CERTIFICATE OF SERVICE

I hereby certify that I have this day, **August 28, 2025**, served a true copy of the foregoing Letter in Response to the Formal Complaint of the Office of Consumer Advocate, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL

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