



September 12, 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: **Request of Energy Center Harrisburg LLC Under Sections 2102(a) and 2102(b) of the Pennsylvania Public Utility Code for Approval of an Agreement with an Affiliated Entity; Docket No. G-2025-3056347**

**Request for Approval of Affiliated Interest Agreement between Energy Center Harrisburg LLC and Harrisburg Cooling LLC; ENERGY CENTER HARRISBURG LLC RESPONSE TO DATA REQUEST TUS-4**

Dear Secretary Homsher:

Enclosed for eFiling with the Pennsylvania Public Utility Commission in the above-referenced matter is Energy Center Harrisburg LLC's response to Data Request TUS-4.

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

A handwritten signature in blue ink, appearing to read "David P. Zambito", written over a light blue circular stamp or watermark.

Counsel for **Energy Center Harrisburg LLC and Harrisburg Cooling LLC**

DPZ:kmg

Enclosure

cc: Lee Yalcin (*Bureau of Technical Utility Services*)

**Request of Energy Center Harrisburg LLC Under Sections 2102(a) and 2102(b) of  
the Pennsylvania Public Utility Code for Approval of an Agreement with an  
Affiliated Entity, Harrisburg Cooling LLC  
Docket No. G-2025-3056347**

**Response of Energy Center Harrisburg LLC to Data Request TUS-4**

**Respondent: Keith L. Li, Consultant  
Energy Center Harrisburg LLC**

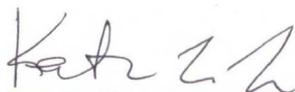
**TUS-4.** Reference Energy Center Harrisburg LLC’s response to TUS-1, Plant Maintenance costs stating: “... inflated amounts were charged to Energy Center Paxton and Harrisburg Cooling due to an error that used the annual amount on a monthly basis. Therefore, the monthly allocation cost was \$3,150 for Energy Center Paxton when it should have been \$262, and \$5,040 to Harrisburg Cooling when it should have been \$682.” Please provide the calculation for Harrisburg Cooling’s annual \$5,040 since the monthly \$682 x 12 months totals \$8,184. If a different number of months or methodology was used, kindly specify.

**RESPONSE:** The Plant Maintenance costs calculation for Harrisburg Cooling should have been a monthly allocation \$420, not \$682.  $\$420 \times 12$  months totals \$5,040, thereby providing the correct annual allocation that was the inflated amount charged to Harrisburg Cooling LLC. The incorrect value of \$682 that was previously referenced in Energy Center Harrisburg LLC’s response to TUS-1 was based on adding the value of the monthly allocation that should have been charged to Energy Center Paxton LLC with the value of the monthly allocation that should have been charged to Harrisburg Cooling LLC, i.e.,  $\$262 + \$420 = \$682$ .

**VERIFICATION**

I, Keith L. Li, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: September 12, 2025



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Keith L. Li  
Consultant  
Energy Center Harrisburg LLC