



COMMONWEALTH OF PENNSYLVANIA

October 7, 2025

David P. Zambito, Esquire  
William A. Lesser, Esquire  
Cozen O'Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101

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

Dear Counsel:

Enclosed please find **CONFIDENTIAL** Interrogatories and Requests for Production of Documents, **Set I**, propounded on Energy Center Harrisburg, LLC (“ECH”), on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

We respectfully request that you provide verified answers to these inquiries within fifteen (15) days of service. Additionally, please serve one copy on OSBA’s consultant, Kevin Higgins, as indicated below:

Kevin C. Higgins  
Principal, Energy Strategies  
111 East Broadway, Suite 1200  
Salt Lake City, UT 84111  
[KHiggins@energystrat.com](mailto:KHiggins@energystrat.com)

Copies of these Interrogatories will be served upon all parties, as indicated on the attached Certificate of Service. Additionally, this Certificate of Service has been electronically filed with Secretary Homsher of the Pennsylvania Public Utility Commission, as required by 52 Pa. Code § 5.341(b). If you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Steven C. Gray*

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney I.D. No. 77538

*Enclosures*

cc: PA PUC Secretary Matthew L. Homsher (Cover Letter & Certificate of Service Only)  
Kevin Higgins  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	<b>Docket No. R-2025-3055959</b>
	:	
v.	:	
	:	
	:	
<b>Energy Center Harrisburg, LLC</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

David P. Zambito, Esquire  
William A. Lesser, Esquire  
Cozen O'Connor  
17 North Second Street  
Suite 1410  
Harrisburg, PA 17101  
[dzambito@cozen.com](mailto:dzambito@cozen.com)  
[wlesser@cozen.com](mailto:wlesser@cozen.com)

Christy Appleby, Esquire  
Harrison Breitman, Esquire  
PA Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101-1923  
[ECH2025BRC@paoca.org](mailto:ECH2025BRC@paoca.org)

Date: October 7, 2025

/s/ Steven C. Gray  
Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney I.D. No. 77538