Pennsylvania Public Utility Commission
v.
PECO Energy Company – Electric Division
Docket No. R-2018-3000164

Responses of the Bureau of Investigation and Enforcement
to PECO Energy Company- Electric Division – Set II
Witness: Joseph Kubas

Docket No. R-2015-2468056*

*Pa. P.U.C. v. UGI Utilities, Inc. – Gas Division,
Docket No. R-2015-2519438*

If the position taken by I&E in testimony in any (or all) of
the foregoing proceedings was different from the position
taken by Mr. Kubas in this case, explain in detail all of the
reasons on which Mr. Kubas relied or intends to rely for
as the basis for the change in I&E’s position.

Response: I&E did not take a position on the application of the FPFTY in any
of these proceedings. This lack of a position in testimony should not
be construed as I&E support for the use of end of year balances in
the FPFTY since the passage of Act 11. Upon further review of the
impact on the revenue, expenses, return on equity, and rates, I&E
decided to address the application of the FPFTY in cases to remove
the uncertainty surrounding these issues.
PECO-I&E-II-22. Refer to I&E Statement No. 3, page 12, lines 1-13. Please state the position with respect to end of FPFTY rate base taken by I&E in the testimony submitted by it in each of the following base rate proceedings:


