

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**

***Pa. P.U.C. v. Columbia Gas of Pennsylvania, Inc.,
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 FPPTY 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 FPPTY 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 FPPTY in cases to remove the uncertainty surrounding these issues.

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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 FPPTY rate base taken by I&E in the testimony submitted by it in each of the following base rate proceedings:

***Pa. P.U.C. v. Columbia Gas of Pennsylvania, Inc.,
Docket No. R-2012-2321748***

***Pa. P.U.C. v. Peoples TWP LLC, Docket No. R-2013-
2355886***

***Pa. P.U.C. v. Pennsylvania-American Water Co.,
Docket No. R-2013-2355276***

***Pa. P.U.C. v. Columbia Gas of Pennsylvania, Inc.,
Docket No. R-2014-2406274***

***Pa. P.U.C. v. Metropolitan Edison Co., Pennsylvania
Electric Co., Pennsylvania Power Co., and West
Penn Power Co., Docket Nos. Docket Nos. R-2014-
2428745, R-2014-2428743, R-2014-2428744, and R-
2014-2428742***

***Pa. P.U.C. v. PPL Electric Utilities Corp., Docket No.
R-2015-2469275***

***Pa. P.U.C. v. PECO Energy Company, Docket No.
2015-2468981***

***Pa. P.U.C. v. Metropolitan Edison Co., Pennsylvania
Electric Co., Pennsylvania Power Co., and West
Penn Power Co., Docket Nos. R-2016-2537349, R-
2016-2537352, R-2016-2537355, and R-2016-
2537359***