

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :  
for Approval of its Act 129 Phase II : M-2012-2334388  
Energy Efficiency and Conservation Plan :

**PREHEARING MEMORANDUM OF THE COALITION FOR AFFORDABLE UTILITY  
SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA**

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Memorandum pursuant to the November 29, 2012 Prehearing Conference Order issued by Administrative Law Judge Dennis Buckley

**I. Background**

On November 15, 2012, PPL Electric Utilities Corporation (“PPL” or the “Company”) filed a Petition for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan (“Phase II EE&C Plan” or “Plan”) with the Pennsylvania Public Utility Commission (Commission) in compliance with 66 Pa.C.S. § 2806.1(b) (relating to energy efficiency and conservation programs.) In accordance with the Energy Efficiency and Conservation Program Implementation Order, entered on August 3, 2012, at Docket Nos. M-2008-2069887 and M-2012-2289411, the Commission directed that responsive pleadings along with comments and recommendations are to be filed with the Commission within 20 days of the publication of notice in the *Pennsylvania Bulletin*. Notice of PPL’s filing of its proposed Phase II EE&C Plan was published in the *Pennsylvania Bulletin* on December 1, 2012. 42 Pa.B. 7372. Concurrent with this prehearing memorandum, CAUSE-PA filed a Petition to Intervene.

**II. Issues to be Presented**

CAUSE-PA intends to address, among other issues, whether the proposed Phase II EE&C Plan ensures that the low income population, as defined in the Act, is correctly targeted; whether those low income customers obtain a share of the total energy savings that is in accord with the Commission's August 3, 2012 Order; and whether the measures employed, and methods of coordination and education are appropriate and comport with and satisfy the requirements of Act 129 and Commission Orders

**III. Witnesses and Testimony**

CAUSE-PA intends to present the following witness to testify in this matter, but reserves the right to call additional witnesses as may be warranted upon proper notice to Your Honor and the parties:

Thu B. Tran, Esq.  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
(215) 981-3777  
[ttran@clsphila.org](mailto:ttran@clsphila.org)

Ms.. Tran will address the issues identified above and any other issues that may arise in the course of this proceeding.

**IV. Proposed Schedule**

CAUSE-PA has reviewed the schedule proposed by ALJ Buckley in his November 28, 2012 Prehearing Order and has only one minor suggested change. The Prehearing Order lists Main Briefs due on January 26, 2012. This is a Saturday. CAUSE-PA suggests that Main Briefs should be due on Monday, January 28, 2012.

**V. Public Input Hearings**

CAUSE-PA does not oppose the scheduling of public input hearing but is not presently requesting that one be scheduled.

**VI. Settlement**

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement early in the process.

**VII. Service on CAUSE-PA**

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. Electronic service and one hard copy of all documents should be served on CAUSE-PA as follows:

Patrick M. Cicero, Esq.  
Harry S. Geller, Esq.  
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Respectfully submitted,

**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



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December 6, 2012

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Petition of PPL Electric Utilities Corporation :  
for Approval of its Act 129 Phase II : M-2012-2334388  
Energy Efficiency and Conservation Plan :

**CERTIFICATE OF SERVICE**

I hereby certify that on **December 6, 2012** I have served copies of the **Prehearing Memorandum of CAUSE-PA**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**FIRST-CLASS MAIL & E-MAIL**

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Respectfully submitted,



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Patrick M. Cicero

Dated: December 6, 2012