

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of its Act 129 Phase III : M-2015-2515642
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 December 18, 2015 Prehearing Conference Order issued by Administrative Law Judge Susan D. Colwell.

I. Background

On November 30, 2015, PPL Electric Utilities Corporation (“PPL” or the “Company”) filed a Petition for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan (“Phase III Plan” or “Plan”) with the Pennsylvania Public Utility Commission (“Commission” or “PUC”) in compliance with 66 Pa. C.S. § 2806.1(b) (relating to energy efficiency and conservation programs) and in accordance with the Commission’s Energy Efficiency and Conservation Program Implementation Order, entered on June 19, 2015, at Docket No. M-2014-2424864 (“Phase III Implementation Order”). The Commission published a Notice of PPL’s Plan in the Pennsylvania Bulletin on December 12, 2015, 45 Pa.B. 7078, which directed that “responsive pleadings, along with comments and recommendations are to be filed with the Commission within 20 days” of the published notice.

On December 17, CAUSE-PA submitted a Petition to Intervene in the instant proceeding. And, concurrent with the filing of this Prehearing Memorandum (December 31, 2015), CAUSE-PA filed a Letter in Lieu of Comments in compliance with the Notice published in the Pennsylvania Bulletin which indicates that it will provide more detailed recommendations and comments in the form of testimony through the litigated proceeding at this docket.

II. Issues to be Presented

CAUSE-PA intends to address the following issue through the presentation of expert witness testimony and evidence for the record in this proceeding: Whether the proposed Phase III EE&C Plan appropriately targets the low income sector. In addressing this overarching issue, CAUSE-PA intends to raise the following sub-issues:

- a. Whether the low income population will obtain a share of the total energy savings that is in accord with Act 129 and the Commission's Implementation Order.
- b. Whether PPL's proposed low income sector programs and identified measures within those programs comport with and satisfy the requirements of Act 129 and Commission Orders.
- c. Whether PPL's proposed low income sector programs provide for measures that have long-lasting savings that will positively impact the high energy burden borne by low-income customers.
- d. Whether PPL's proposed low income sector programs adequately focus on direct installation as required by the Commission's Phase III Implementation Order.
- e. Whether the delivery of measures to the low income population is appropriately coordinated with other low income bill assistance and energy efficiency and conservation programming which operate within the PPL service territory.
- f. Whether PPL's EE&C Plan appropriately leverages its Act 129 Smart Meter rollout to promote and execute programming in a least cost manner.

- g. Whether the proposed multifamily building component of PPL's Plan is sufficiently calibrated to reach the low income population which resides in multifamily buildings.

In addition to these specific issues, CAUSE-PA reserves the right to raise additional issues that may arise as more data and information becomes available throughout the course of this proceeding.

III. Witnesses and Testimony

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

Mitchell Miller
Mitch Miller Consulting LLC
60 Geisel Road
Harrisburg, PA 17112
717-903-2196
Mitchmiller77@hotmail.com

Mr. Miller will address the issues identified above, as well as other issues that may arise in the course of this proceeding.

IV. Proposed Schedule

CAUSE-PA accepts the schedule contained within the December 18, 2015 Prehearing Order, and has worked with the parties to reach consensus on other important dates. As of the date of this Prehearing Memorandum, it is CAUSE-PA's understanding that the following schedule is in accord with Your Honor's Order and agreed to by the parties:

January 4 – Other Parties' Comments
January 5 – Prehearing Conference / Initial Settlement Discussion
January 12 – Other Parties' Direct Testimony

- January 14 – Settlement Discussion
- January 25 – Rebuttal Testimony
- January 29 – Hearing (Harrisburg)
- February 15 – Main Brief
- February 18 – Reply Comments / Revised Plan
- February 19 – Certification of the Record

V. Settlement

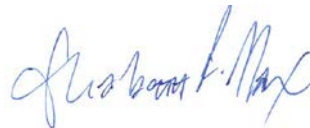
CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement early in the process.

VI. 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:

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Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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December 31, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on this day 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).

VIA EMAIL and/or FIRST CLASS MAIL

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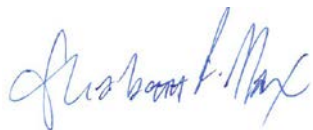
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