

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :
Approval of its Act 129 Phase III : **Docket No. M-2015-2515691**
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 23, 2015 Prehearing Conference Order issued by Administrative Law Judges Angela T. Jones and Darlene Davis Heep.

I. Background

On November 30, 2015, PECO Energy Company (“PECO” 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 PECO’s Plan in the Pennsylvania Bulletin on December 12, 2015, 45 Pa.B. 7078, in which the Commission reiterated the directive in its Implementation Order 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. On January 4, 2016, CAUSE-PA filed a Letter in Lieu of Comments or Recommendations that outlined its concerns about the Plan, and that indicated that CAUSE-PA would be participating in the litigated portion of the proceeding in the form of submitting testimony.

II. Issues to be Presented

CAUSE-PA will address whether the PECO's proposed Phase III Plan appropriately meets the standards set by the Commission as well as the statutory requirements contained in Act 129. Specifically, CAUSE-PA will address the following:

- Whether PECO's proposed programs and identified measures within those programs satisfy the requirements of Act 129 and Commission Orders.
- Whether projected savings come from specific low-income programs or low-income verified participants in multifamily housing programs, and whether the Companies' multi-family housing programs are sufficiently designed to reach and impact low income households regardless of whether they reside in multifamily buildings that are individually-metered/tenant paid or master-metered/owner-paid.
- Whether PECO's Plan properly focuses on direct-install measures for low-income customers as required by the Commission's Implementation Order.
- Whether PECO's Plan provides for measures that have provide long-lasting savings that will positively impact the high energy burden borne by low-income customers.
- Whether the delivery of measures to low-income households is appropriately coordinated with other low income bill assistance and energy efficiency and conservation programming operating within PECO's service territory.

- Whether the delivery of plan measures is appropriately coordinated between Conservation Service Providers (CSPs) serving low-income populations.

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
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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 23, 2015 Prehearing Order with the following suggestions, that have been discussed and agreed to by the active parties to the proceeding.

- January 4 – Other Parties’ Comments
- January 12 – Prehearing Conference / Initial Settlement Discussion
- January 21 – Other Parties’ Direct Testimony
- January 29 – Rebuttal Testimony
- February 2 – Hearing
- February 12 – Main Brief
- February 22 – Reply Comments / Revised Plan
- February 24 – Certification of the Record

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:

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Respectfully submitted,
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January 8, 2016

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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