

**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 8, 2017 Prehearing Conference Order issued by Administrative Law Judge Benjamin J. Myers.

**I. Background**

On March 17, 2016, the Commission issued an Opinion and Order at this docket which approved, in part, PPL Electric Utilities Corporation’s (PPL or the Company) Act 129 Phase III Energy Efficiency and Conservation Plan, as modified by a Joint Petition for Approval of Partial Settlement. CAUSE-PA was an active party to the underlying proceeding,<sup>1</sup> and was a signatory to the Joint Petition for Approval of Partial Settlement.

On June 6, 2017, PPL Electric Utilities Corp. (PPL or the Company) filed at this docket a Petition for Approval of Changes to its Act 129 Phase III Energy Efficiency and Conservation Plan (Petition). Comments to PPL’s proposed amendments were filed by the Office of

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<sup>1</sup> CAUSE-PA’s intervention at this docket was granted by Administrative Law Judge Susan D. Colwell on January 7, 2016. (Jan. 7, 2016 Scheduling Order).

Consumer Advocate (OCA), PP&L Industrial Customer Alliance (PPLICA), the Keystone Energy Efficiency Alliance (KEEA), and the Pennsylvania Energy Efficiency for All Coalition (PA-EEFA), and Reply Comments were filed by PPLICA and PPL. On October 26, 2017, the Commission issued an Opinion and Order, which approved PPL's proposals, in part, but referred the following proposed Plan change to the Office of Administrative Law Judge for hearings and a recommended decision:

Allow for Enhanced Incentives for Localized Energy efficiency or Demand Reduction to be Offered as a Pilot under the Appliance Recycling, Energy Efficient Home, Demand Response and Nonresidential Energy Efficiency Programs.

(Oct. 26 Opinion and Order at 42, ¶ 3.a). Pursuant to the October 26, 2017 Order, ALJ Myers issued a Prehearing Conference Order on December 8, 2017, and set a prehearing conference for February 7, 2018.

## **II. Issues to be Presented**

As an active party in this proceeding, and a signatory party to the Joint Petition for Approval of Partial Settlement, CAUSE-PA has a critical interest in ensuring that PPL's Act 129 Phase III Plan is not modified in a way which would harm low income households. Our participation in this proceeding is narrowly focused to protect that interest and, more specifically, to ensure that decisions made through the course of this proceeding will not negatively impact the adequacy and accessibility of Act 129 energy efficiency programming to low income consumers in PPL's service territory.

**III. Witnesses and Testimony**

At this time, CAUSE-PA has not identified a witness to provide testimony on its behalf in this proceeding, but reserves the right to identify a witness if warranted through the course of the proceeding, upon proper notice to Your Honor and the parties.

**IV. Proposed Schedule**

CAUSE-PA is prepared to work with the parties to identify a mutually agreeable schedule that is also acceptable to ALJ Myers.

**V. Settlement**

CAUSE-PA is prepared to work with the parties to achieve a settlement in this proceeding, and notes that active settlement discussions are underway.

**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:

Elizabeth R. Marx, Esq.  
Patrick M. Cicero, Esq.  
Kadeem Morris, Esq.  
**PENNSYLVANIA UTILITY LAW PROJECT**  
118 Locust Street  
Harrisburg, PA 17102  
Telephone: 717-236-9486  
Facsimile: 717-233-4088  
E-mail: [pulp@palegalaid.net](mailto:pulp@palegalaid.net)

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



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Elizabeth R. Marx – PA ID 309014  
Patrick M. Cicero – PA ID 89039  
Kadeem Morris – PA ID 324702  
118 Locust Street  
Harrisburg, PA 17101  
Tel.: 717-236-9486  
Fax: 717-233-4088  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

January 31, 2018

**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**

**Honorable Benjamin Myers**  
Administrative Law Judge  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[benmyers@pa.gov](mailto:benmyers@pa.gov)

**Kimberly A. Klock, Esq.**  
**Amy Hirkakis, Esq.**  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
Phone: 610-774-4254  
Fax: 610-774-6726  
[kklock@pplweb.com](mailto:kklock@pplweb.com)  
[ahirakis@pplweb.com](mailto:ahirakis@pplweb.com)

**David B. MacGregor, Esq.**  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Phone: 215-587-1197  
Fax: 215-320-4879  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)

**Sarah C. Stoner, Esq.**  
**Carl Shultz, Esq.**  
Eckert Seamans Cherin & Mellott  
213 Market Street, 8<sup>th</sup> Fl.  
Harrisburg, PA 17101  
[sstoner@eckertseamans.com](mailto:sstoner@eckertseamans.com)  
[cshultz@eckertseamans.com](mailto:cshultz@eckertseamans.com)

**Devin T. Ryan, Esq.**  
Post & Schell, P.C.  
17 North Second Street 12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-612-6052  
Fax: 717-731-1985  
[dryan@postschell.com](mailto:dryan@postschell.com)

**Elizabeth Rose Triscari, Esq.**  
Office of Small Business Advocate  
300 N. 2<sup>nd</sup> Street, Ste 202  
Harrisburg, PA 17101  
[etriscari@pa.gov](mailto:etriscari@pa.gov)

**Joseph L. Vullo, Esq.**  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jvullo@aol.com](mailto:jvullo@aol.com)

**Lauren M. Burge Esq.**  
Office of Consumer Advocate  
555 Walnut Street,  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[lburge@paoca.org](mailto:lburge@paoca.org)

**Pamela C. Polacek, Esq.**  
**Alessandra L. Hylander, Esq.**  
McNees, Wallace & Nurick, LLC  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108-1166  
[ppolacek@mwn.com](mailto:ppolacek@mwn.com)  
[ahylander@mcneeslaw.com](mailto:ahylander@mcneeslaw.com)

**Derrick P. Williamson, Esq.**  
**Barry A. Naum, Esq.**  
Spilman Thomas & Battle  
1100 Bent Creek Blvd., Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)

**Micah R. Bucy, Esq.**  
**Judith D. Cassel, Esq.**  
Hawke McKeon and Sniscak, LLP  
100 N. Tenth Street  
Harrisburg, PA 17101  
[jdcassel@hmslegal.com](mailto:jdcassel@hmslegal.com)  
[mrbcy@hmslegal.com](mailto:mrbcy@hmslegal.com)

**Scott Debroff, Esq.**  
Clark Hill PLC  
301 Grant Street, 14<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[sdebroff@clarkhill.com](mailto:sdebroff@clarkhill.com)

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



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Elizabeth R. Marx  
PA ID 309014  
118 Locust Street  
Harrisburg, PA 17101  
717-236-9486  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

**January 31, 2018**