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May 4, 2020

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Petition of PECO Energy Company for Approval of its Default Service Program for the Period from June 1, 2020 Through May 31, 2025 – Docket No. P-2020-3019290

Dear Secretary Chiavetta:

On behalf of NRG Energy, Inc., Direct Energy Services LLC, Interstate Gas Supply Inc., d/b/a IGS Energy, Vistra Energy Corp., Shipley Choice LLC, ENGIE Resources LLC and WGL Energy Services, Inc. (collectively, the “Electric Supplier Coalition”), enclosed for electronic filing please find a Prehearing Conference Memorandum with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

*Karen O. Moury*  
Karen O. Moury

KOM/lww  
Enclosure

cc: Cert. of Service w/enc.

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the Electric Supplier Coalition's Prehearing Conference Memorandum upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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Dated: May 4, 2020

*Karen O. Moury*

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Karen O. Moury

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :  
Approval of Its Default Service Program :  
for the Period From June 1, 2021 Through : Docket No. P-2020-3019290  
May 31, 2025 :

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**PREHEARING MEMORANDUM  
OF ELECTRIC SUPPLIER COALITION**

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Pursuant to 52 Pa. Code § 5.222 and the Prehearing Order of Administrative Law Judge (“ALJ”) Vero dated April 21, 2020, NRG Energy, Inc., Direct Energy Services LLC, Interstate Gas Supply, Inc. d/b/a IGS Energy, Vistra Energy Corp., Shipley Choice LLC, ENGIE Resources LLC and WGL Energy Services, Inc. (collectively, the “Electric Supplier Coalition” or “Coalition”) submits this Prehearing Memorandum. On May 1, 2020, the Electric Supplier Coalition filed its Petition to Intervene in the Petition of PECO Energy Company (“PECO”) for Approval of Its Default Service Program for the Period From June 1, 2021 Through May 31, 2025 (“DSP V Petition”).

**I. SERVICE OF DOCUMENTS**

The Electric Supplier Coalition requests that all documents be served on:

Karen O. Moury, Esquire  
Deanne M. O’Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
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kmoury@eckertseamans.com  
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The Coalition also agrees to receive service of documents electronically in this proceeding. To the extent that materials are available electronically, it is requested that copies be served upon:

Karen Moury – kmoury@eckertseamans.com  
Deanne O’Dell – dodell@eckertseamans.com

**II. SETTLEMENT**

The Coalition is willing to participate in settlement discussions with any party to narrow or fully resolve the issues in this matter.

**III. PROPOSED PLAN AND SCHEDULE OF DISCOVERY**

The Coalition is amenable to working with the other parties in this matter to adopt a reasonable proposed plan and schedule of discovery. The Coalition does not have any proposals regarding discovery modifications. However, the Coalition has reviewed the proposed discovery modifications circulated by PECO and is agreeable to those proposals.

**IV. SCHEDULE FOR SUBMISSION OF TESTIMONY, HEARINGS AND BRIEFS**

The proposed procedural schedule circulated by PECO in advance of the prehearing conference is acceptable to the Coalition. To the extent necessary, the Coalition will cooperate with the other parties and the ALJ to facilitate a workable litigation schedule.

**V. WITNESSES**

The Coalition identifies the following witness:

Travis Kavulla, Vice President for Regulatory Affairs  
NRG Energy, Inc.  
804 Carnegie Center  
Princeton, NJ 08540

In addition, the Coalition reserves its right to identify additional witnesses or change the identity of its witnesses at any time upon appropriate notice to the Presiding Officer and the parties.

**VI. PRESENTLY IDENTIFIED ISSUES**

The Electric Supplier Coalition's members are either licensed electric generation suppliers or have affiliates or subsidiaries providing electric generation service in Pennsylvania, including in PECO's service territory. The Coalition has identified the following issues that should be examined in this proceeding:

- Whether the PECO's overall default service supply plan is consistent with the Public Utility Code and Commission regulations.
- The effectiveness of PECO's default service plan to promote retail market development for the benefit of consumers in PECO's service territories.
- The appropriateness of PECO's proposal to solicit new ten-year contracts for Solar Alternative Energy Credits.
- Whether PECO's proposed rate design and tariffs for default generation service contain all of the cost components incurred to provide default service as required by the Public Utility Code, the Commission's regulations and the Commission's policy statement relating to default service.
- The appropriateness of PECO's proposed continuation of the existing Standard Offer Program.
- The adequacy of PECO's proposed plan for shopping by low income customers.
- Whether it is reasonable for PECO to continue recovering Network Integration Transmission Services costs only from default service customers.
- Whether additional retail market enhancements are warranted.

At this time, the Coalition continues to evaluate its position on and will refine its position based on further study of the proposals, review of discovery and additional input from other

parties. The Coalition reserves the right to address other issues identified through its continued review and analysis of the filing or raised by other parties.

Respectfully submitted,

*Karen O. Moury*

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Date: May 4, 2020

Attorneys for Electric Supplier Coalition