



May 4, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: *Petition of PECO Energy Company for Approval of Its Default Service Plan for the Period from June 1, 2021 through May 31, 2025* (Docket No. P-2020-3019290)

Dear Secretary Chiavetta,

Enclosed for filing in the above-referenced proceeding, please find the Prehearing Memorandum of the Environmental Stakeholders. Should you have any questions, please contact dmcdougall@earthjustice.org. As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document. Thank you.

Sincerely,

/s/ Devin McDougall

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING MEMORANDUM OF
THE ENVIRONMENTAL STAKEHOLDERS**

On April 20, 2020, a Prehearing Conference Order was issued by the Honorable Eranda Vero, Administrative Law Judge. The Order specifies that the Prehearing Conference will be held on May 5, 2020 and will be telephonic only. In response, Clean Air Council, Sierra Club, and Philadelphia Solar Energy Association (the “Environmental Stakeholders”) hereby submit this Prehearing Memorandum.

I. Background

On March 13, 2020, PECO Energy Company (“PECO”) filed a Petition for Approval of the Default Service Programs for the period from June 1, 2021 through May 31, 2025, its fifth submission (“DSP V”). On May 1, 2020, the Environmental Stakeholders filed a Petition to Intervene in order to evaluate potential environmental and clean energy issues implicated by PECO’s proposed DSP V.

II. Issues to be Presented

Based upon their initial review of PECO’s proposed DSP V, the Environmental Stakeholders have identified the following issues:

- a. The proportion of renewable energy included in the proposed DSP V;
- b. The potential contribution of distributed solar as a means of increasing reliability within PECO’s service territory; and
- c. PECO’s use of time-of-use (“TOU”) rates and electric vehicle incentives.

The Environmental Stakeholders reserve the right to raise other issues as those may arise.

III. Witnesses

The Environmental Stakeholders have not identified a witness that they may call, but they reserve the right to call a witness or witnesses.

IV. Proposed Schedule

The Environmental Stakeholders will work with all parties to establish a reasonable schedule.

V. Settlement

The Environmental Stakeholders will engage in settlement discussions with any and all parties in an attempt to resolve or narrow the issues in this proceeding.

VI. Public Input Hearings

Due to the potential impact on all PECO ratepayers, including members of the Environmental Stakeholders, the Environmental Stakeholders request that at least two (2) public hearings be held in order to allow participation by PECO ratepayers. To ensure accessibility to ratepayers, the Environmental Stakeholders propose that one (1) public hearing be held in Philadelphia, and one (1) public hearing be held in a suburban location within PECO's service territory.

The types of energy procured by PECO will have a long-lasting effect on all those who live in PECO's service territory. In addition, allowing PECO ratepayers to fully utilize TOU rates will benefit ratepayers financially, and lessen the demand within PECO's service territory. The public's input in this proposal is critical and should be considered by the Commission in its decisionmaking.

VII. Service on the Environmental Stakeholders

Electronic service only of all documents should be served as follows:

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Logan Welde, Esq.
E-mail: lwelde@cleanair.org
Telephone: (215) 567-4004

WHEREFORE, the Environmental Stakeholders respectfully submit this Prehearing Memorandum.

Dated: May 4, 2020

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing electronically-filed document upon the parties, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Honorable Eranda Vero Administrative Law Judge Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor Harrisburg, PA 17120 evero@pa.gov	W. Craig Williams, Esquire Anthony Gay, Esquire Jack Garfinkle, Esquire Exelon Business Services Company 2301 Market Street, S23-1 Philadelphia, PA 19101-8699 craig.williams@exeloncorp.com Anthony.gay@exeloncorp.com Jack.garfinkle@exeloncorp.com
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Dated: May 4, 2020

/s/ Devin McDougall

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