



September 9, 2020

VIA E-FILE

The Honorable F. Joseph Brady
Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
fbrady@pa.gov

Re: Petition of Philadelphia Gas Works for Approval of Demand Side Management Plan for FY 2014-2016, 52 Pa. Code § 62.4 – Request for Waivers

Docket P-2014-2459362

Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)

Dear Judge Brady,

Please find the attached Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania, which was filed electronically with the Commission this morning.

Respectfully,

A handwritten signature in blue ink that reads "Elizabeth R. Marx".

Elizabeth R. Marx, Esq.
Counsel for CAUSE-PA

CC: Parties of Record – Certificate of Service
Secretary Rosemary Chiavetta

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Philadelphia Gas Works for Approval :
of Demand Side Management Plan for FY 2014-2016, : Docket No. P-2014-2459362
52 Pa. Code § 62.4 – Request for Waivers :

**PREHEARING MEMORANDUM
OF THE COALITION FOR AFFORDABLE UTILITY SERVICES
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

On September 2, 2020, The Honorable F. Joseph Brady, Administrative Law Judge, issues a Prehearing Conference Order setting a telephonic prehearing conference for September 10, 2020 at 10 a.m. in the above captioned matter, and requiring the submission of a prehearing conference memorandum on or before noon on Wednesday, September 9, 2020. In response, the Coalition for Affordable Utility Services and Energy Efficiency (CAUSE-PA), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Conference Memorandum.

I. Background

On May 7, 2020, Philadelphia Gas Works (PGW) filed a Demand-Side Management Program (DSM) Implementation Plan for Fiscal Years 2021-2023. PGW filed this DSM Implementation Plan at its 2014 Docket (captioned above), through which PGW's prior DSM Plan for 2016-2020 was reviewed and approved. CAUSE-PA was an active party in the above captioned docket with regard to the review and approval of PGW's DSM Plan for 2016-2020.

On August 31, 2020, a Telephonic Prehearing Conference Notice was issued setting a prehearing conference in this matter for Thursday, September 9, 2020 at 10:00 am before ALJ Brady. On September 1, 2020, a second Telephonic Prehearing Conference Notice was issued rescheduling the Prehearing Conference in this matter to September 10, 2020 at 10:00 am.

On September 2, 2020, CAUSE-PA filed a Petition to Intervene requesting that it be granted full, active party status in the Commission's review of PGW's DSP Implementation Plan for Fiscal Years 2021-2023.

II. Issues to be Presented

CAUSE-PA preliminarily reviewed PGW's Petition and Plan and has identified a number of issues presented by the filing which potentially affect its members. CAUSE-PA anticipates that additional issues may arise as a more comprehensive review of the Petition and Plan is undertaken, stakeholder collaborative meetings continue, discovery is conducted, and testimony is provided and reviewed. However, among the issues identified by CAUSE-PA include:

1. Whether PGW's proposal to phase out its current multifamily programming and institute a new program design and incentive structure will provide an appropriate level of benefits to properly incentivize adoption of energy efficiency measures in this traditionally underserved housing type.
2. Whether PGW has proposed an appropriate and equitable program budget to ensure that PGW customers will be able to reasonably access programming under the DSM Implementation Plan.
3. Whether PGW must offer a proportionate level of programming within its voluntary DSM for PGW's low income consumers.¹

III. Witnesses and Testimony

CAUSE-PA is working to identify an expert witness for this case, and will provide prompt notice to Your Honor and the parties upon identification.

¹ See 66 Pa. C.S. § 2806.1(b)(i)(G).

IV. Proposed Schedule

CAUSE-PA is supportive of the proposed timeframe for initial settlement discussions and for subsequent litigation that we understand will be included in PGW's Prehearing Memorandum. CAUSE-PA believes it is important to set aside sufficient time for careful review and analysis of PGW's DSM Implementation Plan by interested parties and the Commission.

PGW's Plan is detailed, and includes a number of substantial changes to its existing programs that may significantly alter the type and availability of energy efficiency programs to PGW customers. PGW's DSM II proceeding, at this same docket, raised a number of contentious and fully litigated issues. In this proceeding, PGW is proposing modifications to the design and delivery of its DSM programs which may have a substantial impact on the accessibility of programming for a number of customer groups. It is important that sufficient time be afforded for this proceeding to allow for the parties to fully review PGW's newly proposed DSM Implementation Plan and determine whether its proposed changes will disrupt or change the balance previously struck by the Commission in PGW's prior DSM Plan.

V. Service on CAUSE-PA

CAUSE-PA is represented in this proceeding by:

John W. Sweet, Esquire
Elizabeth R. Marx, Esquire
Ria M. Pereira, Esq
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118 Locust Street
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Counsel for CAUSE-PA consents to the service of documents by electronic mail to pulp@palegalaid.net, as provided in 52 Pa. Code § 1.54(b)(3).

VI. Discovery

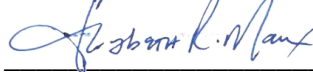
CAUSE-PA is not proposing any discovery modifications at this time.

VII. 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.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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Date: September 9, 2020

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Philadelphia Gas Works for Approval :
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Certificate of Service

I hereby certify that I have this day served copies of the **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54, as modified by the Commission’s March 20 Emergency Order, in the manner and upon the persons listed below.

VIA EMAIL

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