

BURKE VULLO REILLY ROBERTS

ATTORNEYS AT LAW

1460 Wyoming Avenue
Forty Fort, PA 18704
Phone (570) 288-6441 + Fax (570) 288-4598

*Formerly Burke & Burke
Thomas F. Burke, Sr. (1932-1972)*

www.bvrrlaw.com

JOSEPH L. VULLO
jlvullo@bvrrlaw.com

January 4, 2021

via Electronic Filing

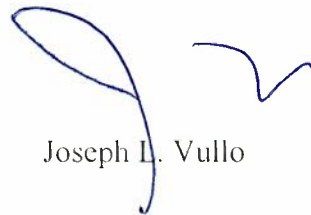
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Joint Petition for Consolidation of Proceedings and Approval of Phase IV
Energy Efficiency and Conservation Plan of Metropolitan Edison Company,
Pennsylvania Electric Company, Pennsylvania Power Company, and West
Penn Power Company
Docket Nos.: M-2020-3020820, M-2020-3020821, M2020-3020822, and
M-2020-3020823

Dear Secretary Chiavetta:

Please accept for filing the Community Action Association of Pennsylvania's Prehearing Memorandum in the above-referenced matter. A copy of this filing was served in accordance with the attached Certificate of Service.

Respectfully submitted,



Joseph L. Vullo

JLV/jar
encl.

cc: All Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition for Consolidation of Proceedings	:	Docket Nos.	M-2020-3020820
And Approval of the Phase IV Energy Efficiency	:		M-2020-3020821
And Conservation Plan of Metropolitan Edison	:		M-2020-3020822
Company, Pennsylvania Electric Company,	:		M-2020-3020823
Pennsylvania Power Company, and West Penn	:		
Power Company	:		

**COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA'S
PREHEARING MEMORANDUM**

I. HISTORY

The Community Action Association of Pennsylvania (CAAP) intervened in this matter by Petition to Intervene filed on December 21, 2020. CAAP is a statewide association representing Pennsylvania's community action agencies that provide anti-poverty planning and community development activities for low-income communities and services to individuals and families. CAAP has intervened in prior matters before the Pennsylvania Public Utility Commission for the purpose of addressing a company's universal service programs and Act 129 Plans. CAAP intervened in this particular matter to examine the Companies' proposed plans, particularly the low-income components of those plans. CAAP reserves the right to address other issues raised by the Companies' requests.

II. ISSUES TO BE PRESENTED BY CAAP

1. CAAP reserves the right to address all portions of the Companies' Plans but its main purpose is to address that portion of the Plans that addresses low-income customers.
2. Whether the Companies' plans serve the substantial public interest in ensuring that low-income customers receive the consumption reduction benefits as required under Act 129 and the Phase IV Implementation Order.

3. Such other additional issues as may arise during the discovery process.

III. WITNESSES

CEO will present the testimony of Susan A. Moore, Executive Director of CAAP, to address the issues above-described.

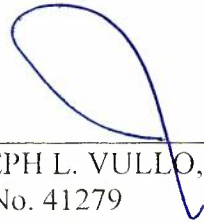
IV. PROPOSED SCHEDULE

CAAP will work with the other parties for an agreed upon schedule to be presented to the Administrative Law Judge.

V. SETTLEMENT

CAAP will be open to settlement discussions as this matter proceeds.

Respectfully submitted,



JOSEPH L. VULLO, ESQUIRE
I.D. No. 41279
jlvullo@bvrrlaw.com
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
Attorney for Community Action Association
of Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition for Consolidation of Proceedings	:	Docket Nos.	M-2020-3020820
And Approval of the Phase IV Energy Efficiency	:		M-2020-3020821
And Conservation Plan of Metropolitan Edison	:		M-2020-3020822
Company, Pennsylvania Electric Company,	:		M-2020-3020823
Pennsylvania Power Company, and West Penn	:		
Power Company	:		

CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Community Action Association of Pennsylvania's Prehearing Memorandum upon the following participants this 4th day of January, 2021 via electronic mail:

John L. Munsch
FirstEnergy Service Company
800 Cabin Hill Drive
Greensburg, PA 15601
jmunsch@firstenergycorp.com

Christy Appleby
Darryl A. Lawrence
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
cappleby@paoca.org

David B. MacGregor
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

Devin T. Ryan
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dryan@postschell.com

Erin Fure
Sharon E. Webb
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
efure@pa.gov
swebb@pa.gov

Sarah C. Stoner
Daniel Clearfield
Deanne M. O'Dell
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
sstoner@eckertseamans.com
dclearfield@eckertseamans.com
dodell@eckertseamans.com

Susan E. Bruce, Esquire
Charis Mincavage, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108
sbruce@mneeeslaw.com
cmincavage@mneeeslaw.com
vkandrikas@mneeeslaw.com

Thomas J. Sniscak, Esquire
William E. Lehman, Esquire
Hawke, McKeona & Sniscak, LLP
100 North 10th Street
P.O. Box 1778
Harrisburg, PA 17105-1778
tjsniscak@hmslegal.com
welehman@hmslegal.com

Derrick Price Williamson
Barry A. Naum
Spilman, Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

John W. Sweet, Esquire
Elizabeth R. Marx, Esquire
Ria M. Pereira, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net



JOSEPH L. VULLO, ESQUIRE
I.D. No. 41279
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@bvrrlaw.com
Attorney for Community Action Association
of Pennsylvania