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January 6, 2021

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor (filing room)  
Harrisburg, PA 17120

Re: Petition of PPL Electric Utilities Corporation for Approval of Its Act 129 Phase IV Energy Efficiency and Conservative Plan; Docket No. M-2020-3020824;  
**PREHEARING CONFERENCE MEMORANDUM OF SUSTAINABLE ENERGY FUND OF CENTRAL EASTERN PENNSYLVANIA**

Dear Secretary Chiavetta:

Enclosed for electronic filing with the Commission is the Prehearing Conference Memorandum of Sustainable Energy Fund of Central Eastern Pennsylvania's ("SEF") in the above-referenced matter. Copies of the Petition have been served in accordance with the attached Certificate of Service.

If you should have any questions regarding this filing, please do not hesitate to contact our office.

Best regards,

*/s/ Judith D. Cassel*

Judith D. Cassel  
Micah R. Bucy  
*Counsel for The Sustainable Energy Fund of Central Eastern Pennsylvania*

JDC/MRB/das  
Enclosure

cc: Honorable Mark A. Hoyer (via email, [mhoyer@pa.gov](mailto:mhoyer@pa.gov))  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :  
Corporation for Approval of Its Act 129 :  
Phase IV Energy Efficiency and : Docket No. M-2020-3020824  
Conservation Plan :

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**PREHEARING CONFERENCE MEMORANDUM  
OF SUSTAINABLE ENERGY FUND  
OF CENTRAL EASTERN PENNSYLVANIA**

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The Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”), by and through its counsel, Hawke McKeon & Sniscak LLP, hereby submits its Prehearing Memorandum in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”).

**I. INTRODUCTION**

On November 30, 2020, PPL Electric Utilities Corporation (“PPL”), filed with the Commission its petition for the approval of its Act 129 Phase IV Energy Efficiency & Conservation Plan (“Phase IV Plan”). The Phase IV Plan was filed pursuant to Act 129 of 2008 (“Act 129”), P.L. 1592, 66 Pa.C.S. §2806.1 and 2806.2, and the Commission’s Implementation Order entered on June 18, 2020 at Docket No. M-2020-3015228.

On December 18, 2020, SEF filed a Petition to Intervene in this proceeding.

On December 30, 2020, a prehearing order in this proceeding was entered on the docket that scheduled a prehearing conference on January 7, 2021 at 10:00 a.m. and instructed parties to file a prehearing memorandum by 2:00 p.m. on January 6, 2021.

On January 2, 2021, a notice of the PPL Phase IV Plan was published in the Pennsylvania Bulletin, 51 Pa.B. 116, and established a January 22, 2021 due date for filing comments.

## **II. CONTACT INFORMATION**

The name, address and telephone number of SEF's attorneys (for purposes of the service list) is below. For purposes of the prehearing conference scheduled for January 7, 2021, Micah Bucy will be the primary speaker for SEF.

Judith D. Cassel, Attorney ID No. 209393  
Micah R. Bucy, Attorney ID No. 320196  
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## **II. ISSUES**

Although SEF is still evaluating PPL's Phase IV Plan and thus reserves its right to raise additional issues and respond to all matters raised by other parties, at this time SEF intends to address the following issues:

1. SEF intends to address the proposed kWh rebate for both Small and Large Commercial and Industrial Customers. SEF believes the rebate range should be more narrowly defined than the figures proposed by PPL's Phase IV Plan.

2. SEF intends to address the educational measures with respect to the Small and Large Commercial and Industrial Customers. SEF believes that a more substantive and detailed plan for educational outreach is necessary for these customer classes than what is provided for in PPL's Phase IV Plan.

3. SEF intends to address mechanisms to measure and record savings that are attained by the Government, Non-Profit, and Education customer class. Although SEF is aware that the Commission has not imposed a carveout for the GNE customer class in Phase IV, PPL is still

required to track, record, and file with the Commission in its annual report savings that are achieved by this customer class. SEF believes that PPL's Phase IV Plan needs to address the steps to ensure this information is accurately tracked and reported.

### **III. WITNESSES**

SEF anticipates that it will submit written testimony of John Costlow, President and Chief Executive Officer of SEF concerning the above issues. Additionally, as SEF is still evaluating PPL's Phase IV Plan, SEF reserves the right to submit evidence concerning additional issues and in response to matters raised by all parties.

### **IV. SCHEDULE AND DISCOVERY**

SEF will cooperate with the ALJ and the other parties to formulate a reasonable procedural schedule and discovery rules in accordance with the Commission's regulations and ALJ directives.

### **VI. SETTLEMENT**

SEF supports the settlement process and is amenable to meeting with PPL and the parties for the purpose of discussing settlement of the entire matter or stipulation of discrete issues.

Respectfully submitted,

/s/ Judith D. Cassel

Judith D. Cassel, ID No. 209393

Micah R. Bucy, ID No. 320196

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*Counsel for Sustainable Energy Fund of Central  
Eastern Pennsylvania*

Dated: January 6, 2021

**CERTIFICATE OF SERVICE**

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

**VIA ELECTRONIC MAIL ONLY**

<p>Devin T. Ryan Post &amp; Schell, P.C. 17 North Second Street, 12<sup>th</sup> Floor Harrisburg, PA 17101-1601 <a href="mailto:dryan@postschell.com">dryan@postschell.com</a> <i>Counsel for PPL Electric Utilities Corporation</i></p>	<p>David B. MacGregor Post &amp; Schell, P.C. Four Penn Center 1600 John F. Kennedy Boulevard Philadelphia, PA 19103-2808 <a href="mailto:dmacgregor@postschell.com">dmacgregor@postschell.com</a> <i>Counsel for PPL Electric Utilities Corporation</i></p>
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*/s/ Judith D. Cassel*

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Judith D. Cassel

Dated this 6<sup>th</sup> of January, 2021.