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April 27, 2011

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA HAND DELIVERY

RE: Met-Ed Request for Proposal Process for Energy Efficiency and Demand Response Consulting Services; Docket No. M-2009-2092222

Penelec Request for Proposal Process for Energy Efficiency and Demand Response Consulting Services; Docket No. ~~M-2009-2092952~~ M-2009-2112952

Penn Power Request for Proposal Process for Energy Efficiency and Demand Response Consulting Services; Docket No. ~~M-2009-2092956~~ M-2009-2112956

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the original and three (3) copies of the Prehearing Memorandum on behalf of the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the Penn Power Users Group ("PPUG"), (collectively, "MEIUG, et al."), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being served with a copy of this document. Please date stamp the extra copy of this transmittal letter and Prehearing Memorandum, and kindly return them to our messenger for our filing purposes.

Very truly yours,

McNEES WALLACE & NURICK LLC

By *Vasiliki Karandrikas*
Vasiliki Karandrikas

Counsel to Met-Ed Industrial Users Group Penelec Industrial Customer Alliance, and Penn Power Users Group

VK/sds

Enclosures

c: Administrative Law Judge Dennis J. Buckley (via E-Mail and Hand Delivery)
Jonathan Nase, Office of Special Assistants (via E-Mail and Hand Delivery)
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Met-Ed Request for Proposal Process for Energy Efficiency and Demand Response Consulting Services	:	Docket No.	M-2009-2092222
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Penelec Request for Proposal Process for Energy Efficiency and Demand Response Consulting Services	:	Docket No.	M-2009-2092952 <i>M-2009-2112952</i>
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	:		
Penn Power Request for Proposal Process for Energy Efficiency and Demand Response Consulting Services	:	Docket No.	M-2009-2092956 <i>M-2009-2112956</i>

**PREHEARING MEMORANDUM OF THE MET-ED INDUSTRIAL USERS GROUP,
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE, AND
THE PENN POWER USERS GROUP**

As requested by Administrative Law Judge ("ALJ") Dennis J. Buckley in the April 13, 2011, Prehearing Conference Order, the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the Penn Power Users Group ("PPUG") (collectively, "MEIUG, et al."), hereby submit this Prehearing Memorandum.

I. HISTORY OF THE PROCEEDING

On February 18, 2011, Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec") and Pennsylvania Power Company ("Penn Power") (collectively, the "Companies"), filed a Joint Petition for Amendment of the Orders Approving Energy Efficiency and Conservation ("EE&C") Plans and Petition for Approval of First Amended EE&C Plans ("Joint Petition") seeking approval of proposed modifications to the Companies' EE&C Plans by May 19, 2011, for implementation by June 1, 2011. Specifically, the Companies proposed significant increases to the Energy Efficiency and Conservation Charge ("EEC-C") Rider rates for Large Commercial and Industrial ("C&I") customers.

On March 10, 2011, MEIUG, et al., filed an Answer to the Companies' Joint Petition.¹ A description of MEIUG, et al., is set forth in Paragraph 12 of the MEIUG, et al., Answer.

A Prehearing Conference is scheduled in this proceeding for April 29, 2011.

II. COMMUNICATIONS

For purposes of service in the above-captioned proceeding, please direct all communications to:

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III. ANTICIPATED ISSUES AND SUB-ISSUES

MEIUG, et al., is concerned with the potential impact of the proposed changes to, and increased funding for, Large C&I Programs on the Companies' Large C&I customers. Specifically, MEIUG, et al., is concerned that the Joint Petition and accompanying materials are deficient and, therefore, do not present adequate information to accurately assess the impact of the proposed changes on the Companies' Large C&I customers. Additionally, MEIUG, et al., is concerned that the information presented does not provide a sufficient basis upon which to determine whether the proposed EE&C Plan changes are necessary, appropriate, reasonable, and non-discriminatory. MEIUG, et al., anticipates pursuing these issues during this proceeding and

¹ MEIUG, et al., filed a Joint Petition to Intervene when this proceeding first commenced on July 1, 2009. The MEIUG, et al., Joint Petition to Intervene was granted by ALJ David A. Salapa on July 30, 2009.

reserves the right to raise further issues and to respond to issues raised by other parties.

IV. PROPOSED WITNESSES

MEIUG, et al., intends to present customer impact testimony and may also present expert witness testimony. MEIUG, et al. is still evaluating the appropriate individuals to sponsor such testimony in this proceeding. Once such individuals have been selected, MEIUG, et al., will inform the ALJ and the other parties as soon as possible.

MEIUG, et al., also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions and reply exceptions, if necessary.

V. PROPOSED SCHEDULE AND DISCOVERY RULES

MEIUG, et al., has developed a proposed procedural schedule, which is attached hereto as Attachment "A." In developing a proposed procedural schedule, MEIUG, et al., endeavored to accommodate the need for expediency while providing parties with adequate time to engage in discovery and prepare testimony to address the various issues in this proceeding. Moreover, MEIUG, et al., is authorized to state that the proposed procedural schedule is acceptable to the Office of Consumer Advocate. Thus, MEIUG, et al., respectfully submits Attachment "A" for consideration as the proposed procedural schedule for this proceeding, subject to the presiding Administrative Law Judge's ("ALJ") availability.

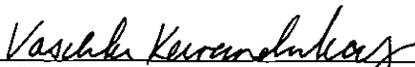
MEIUG, et al., will cooperate with the ALJ and the parties at the Prehearing Conference to develop appropriate discovery rules in accordance with the Commission's regulations and any directives issued by the ALJ.

VI. POSSIBILITY OF SETTLEMENT

MEIUG, et al., is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 
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Dated: April 27, 2011

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

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	:		
	:		
Penn Power Request for Proposal Process for Energy Efficiency and Demand Response Consulting Services	:	Docket No.	M-2009-2092956 M-2009-2112956

PROPOSED PROCEDURAL SCHEDULE

April 29	Prehearing Conference
June 1	Non-Company Parties Direct Testimony
June 10	Rebuttal Testimony
June 17	Surrebuttal Testimony
June 22-23	Hearings
July 6	Main Briefs
July 13	Reply Briefs

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

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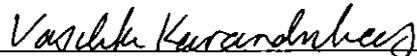
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Dated this 27th day of April, 2011, in Harrisburg, Pennsylvania.