

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2017 through May 31, 2019

Docket Nos. P-2015-2511333
P-2015-2511351
P-2015-2511355
P-2015-2511356

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

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby submits this Prehearing Memorandum pursuant to the November 6, 2015, Prehearing Order of Administrative Law Judge David A. Salapa.

I. History of Proceeding

On November 3, 2015, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (collectively the “First Energy Companies” or “Companies”) filed a Joint Petition for Approval of their Default Service Programs for the period commencing June 1, 2017 through May 31, 2019.

On November 30, 2015, CAUSE-PA, through its attorneys at the Pennsylvania Utility Law Project, filed a Petition to Intervene in this proceeding.

On November 6, 2015, Administrative Law Judge David A. Salapa issued a Prehearing Conference Order scheduling a Prehearing Conference for December 1, 2013 at 10:00 a.m. The Prehearing Order directed that on or before November 30, 2015, all parties are to file and serve a Prehearing Conference Memoranda. This Prehearing Conference Memoranda is filed in accordance with Judge Salapa's Order.

II. Service on CAUSE-PA

CAUSE-PA consents to accept by electronic delivery documents on the deadlines for their filing:

Joline Price, Esq.
Patrick M. Cicero, Esq.
Elizabeth R. Marx, Esq.

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III. Settlement

CAUSE-PA is willing to work with the other parties in this proceeding in order to come to a full or partial settlement of the litigated issues.

IV. Discovery, Submission of Written Testimony, In-Person Hearing, and Submission of Briefs

CAUSE-PA has examined the proposed schedule and will work with the other parties to come to a schedule which suits the needs of all of the parties and the Commission.

V. Witnesses and Testimony

CAUSE-PA reserves the right to present in this proceeding direct, rebuttal, and surrebuttal fact and expert testimony, to the extent it deems necessary. CAUSE-PA has not yet identified its witness for this proceeding. As soon as it identifies a witness, CAUSE-PA will promptly notify the parties to this proceeding as well as the Administrative Law Judge.

VI. Issues to be Presented

CAUSE-PA is concerned about the effect that the proposed programs will have on the long-term affordability of service for economically vulnerable households within its service territory. While CAUSE-PA is still formulating its positions on all of the issues presented in the Companies' filing, it has tentatively identified the following 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 Companies' filing is undertaken, discovery is conducted, and the Companies' testimony is presented. However, the preliminary issues identified by CAUSE-PA include:

a. Customer Referral Program

In their Petition the Companies propose to continue offering their Customer Referral Program ("CRP") for residential and small commercial customers from June 1, 2017 to May 31, 2019. Joint Petition, ¶ 47. The Companies propose to continue to recover the cost of the CRP through the Companies' applicable non-bypassable DSS Riders. Joint Petition, ¶ 48. The Companies propose some changes to the CRP agreement with participating Electricity Generation Suppliers (EGSs). Joint Petition, ¶ 49.

b. Purchase of Receivables

The Companies propose changes to their Purchase of Receivables program and EGS-related write-offs. Joint Petition, ¶ 50-51. The Companies propose changes to the processing of EGS refunds. Joint Petition, ¶ 54. Both of these changes will potentially impact collection activity and refunds for those low-income customers who are currently, and/or will in the future, receive electric generation service from electricity generation suppliers.

The Companies assert that the proposed programs are in the public interest. Joint Petition, ¶ 62.

VII. Evidence to be Presented

CAUSE-PA reserves the right to present evidence on any of the issues identified by the Companies in their filings, including but not limited to the issues identified above. While CAUSE-PA has not yet identified its witness for this proceeding, it intends to thoroughly review the evidence presented by the Companies and other parties in this proceeding, as well as fully participate in discovery. Any and all evidence presented by CAUSE-PA will be directed so as to ensure that low-income customers are adequately protected in the continued provision of default service.

VIII. Conclusion

CAUSE-PA respectfully requests that its Prehearing Memorandum be entered into the record of this proceeding.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
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November 30, 2015

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CERTIFICATE OF SERVICE

I hereby certify that I have November 30, 2015, served copies of the **Petition to Intervene of CAUSE-PA**, via email and/or first-class mail upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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