

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :
for Approval of its Act 129 Phase III :
Energy Efficiency and Conservation Plan : Docket No.: M-2015-2515375

**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 files this Prehearing Memorandum pursuant to the December 15, 2015 Prehearing Conference Order issued by Administrative Law Judge Katrina L. Dunderdale.

I. Background

On November 30, 2015, Duquesne Light Company (“Duquesne” or “the Company”) filed a Petition for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan (“Phase III Plan” or “Plan”) with the Pennsylvania Public Utility Commission (“Commission” or “PUC”) in compliance with 66 Pa. C.S. § 2806.1(b) (relating to energy efficiency and conservation programs) and in accordance with the Commission’s Energy Efficiency and Conservation Program Implementation Order, entered on June 19, 2015, at Docket No. M-2014-2424864 (“Phase III Implementation Order”). Notice of Duquesne’s plan filing was published in the Pennsylvania Bulletin on December 12, 2015, 45 Pa.B. 7078, in which the Commission reiterated the directive in its Implementation Order that “responsive pleadings, along with comments and recommendations are to be filed with the Commission within 20 days” of the published notice.

On December 17, CAUSE-PA submitted a Petition to Intervene in the instant proceeding. And, concurrent with the filing of this Prehearing Memorandum, CAUSE-PA filed Comments that outline its concerns about the Plan and indicates that it will provide more detailed recommendations and comments in the form of testimony through the litigated proceeding at this docket.

II. Issues to be Presented

CAUSE-PA intends to address the following issue through the presentation of expert witness testimony and evidence for the record in this proceeding: Whether Duquesne's proposed Phase III Plan appropriately targets the low-income population¹ to meet energy savings targets. In addressing this overarching issue, CAUSE-PA intends to raise the following sub-issues:

- a. Whether the low income population will obtain a share of the total energy savings that is in accord with Act 129 and the Commission's Implementation Order.
- b. Whether Duquesne's proposed programs and identified measures within those programs satisfy the requirements of Act 129 and Commission Orders.
- c. Whether projected savings come from specific low-income programs or low-income verified participants in multifamily housing programs, and whether Duquesne's multi-family housing programs are sufficiently designed to reach and impact low income households regardless of whether they reside in multifamily buildings that are individually-metered/tenant paid or master-metered/owner-paid.

¹ Act 129 defines low-income as households at or below 150% of the federal poverty income guidelines. 66 Pa. C.S. § 2806.1(b)(1)(i)(G).

- d. Whether Duquesne's Plan properly focuses on direct-install measures for low-income customers as required by the Commission's Implementation Order.
- e. Whether the Duquesne Plan focuses on measures that provide long-lasting savings that will positively impact the high energy burden borne by low-income customers.
- f. Whether the delivery of measures to low income households is appropriately coordinated with other low income bill assistance and energy efficiency and conservation programming operating within the Duquesne service territory.
- g. Whether the delivery of plan measures is appropriately coordinated between Conservation Service Providers (CSPs) serving low-income populations and with CSPs serving the general population.

In addition to these specific issues, CAUSE-PA reserves the right to raise additional issues that may arise as more data and information becomes available throughout the course of this proceeding.

III. Witnesses and Testimony

CAUSE-PA intends to present the following witness to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to Your Honor and the parties:

Mitchell Miller
Mitch Miller Consulting LLC
60 Geisel Road
Harrisburg, PA 17112
717-903-2196
Mitchmiller77@hotmail.com

Mr. Miller will address the issues identified above, as well as other issues that may arise in the course of this proceeding.

IV. Proposed Schedule

Based on conversations with the Company and the Office of Consumer Advocate, CAUSE-PA is proposing the following schedule:

Prehearing Memoranda	January 5
Prehearing Conference	January 6
Other Parties' Direct	January 13
Rebuttal Testimony	January 21
Evidentiary Hearing	January 26
Main Briefs	February 5
Revised Plan	February 22
Certification to the Commission	February 24

V. Public Input Hearings

CAUSE-PA does not oppose the scheduling of public input hearing but is not presently requesting that one be scheduled.

VI. 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.

VII. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. Electronic service and one hard copy of all documents should be served on CAUSE-PA as follows:

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Respectfully submitted,
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December 30, 2015

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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 Service and Energy Efficiency in Pennsylvania (CAUSE-PA)** as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA EMAIL and/or FIRST CLASS MAIL

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Dated: December 30, 2015

