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January 4, 2016

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
Harrisburg, PA 17105-3265

RE: Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan; Docket No. M-2015-2515642;
Prehearing Memorandum of the Sustainable Energy Fund of Central Eastern Pennsylvania

Dear Secretary Chiavetta:

Enclosed for filing is the Prehearing Memorandum of the Sustainable Energy Fund of Central Eastern Pennsylvania in the above-referenced matter.

If you have any questions concerning this filing, please do not hesitate to contact my office.

Very truly yours,



Judith D. Cassel
Micah R. Bucy

*Counsel for The Sustainable Energy Fund of
Central Eastern Pennsylvania*

JDC/MRB
Enclosures

cc: Administrative Law Judge Susan D. Colwell
Per Certificate of Service

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

CERTIFICATE OF SERVICE

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

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Judith D. Cassel

Dated: January 4, 2016

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities	:	
Corporation for Approval of its Act 129	:	Docket No.: M-2015-2515642
Phase III Energy Efficiency and	:	
Conservation Plan	:	

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

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. Background

On November 30, 2015, PPL Electric Utilities Corporation’s (“PPL”), filed with the Commission its petition for the approval of its Act 129 Phase III Energy Efficiency & Conservation Plan (“Phase III Plan”). The Phase III 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 19, 2015.

On December 12, 2015, a notice of PPL Phase III Plan was published in the *Pennsylvania Bulletin* and established a January 4, 2016 due date for filing comments. On December 18, 2015,

a prehearing conference order was issued, which directed all parties to file a prehearing conference memoranda by January 4, 2016.

On December 21, 2015, SEF intervened in PPL's Petition for Approval of its Act 129 Phase III Plan.

II. Contact Person

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III. Anticipated Issues

Although SEF is still evaluating PPL's Phase III Plan and thus reserves its right to raise further issues and respond to all matters raised by other parties, at this time SEF intends to address two particular issues within the proposed plan:

1. SEF recognizes the emphasis that PPL placed on consumer education in its Phase III Plan. SEF believes consumer education is a vital aspect in meeting both the goals of the Commission and those that PPL has set for itself in the Phase III Plan. SEF believes that PPL's Act 129 Phase III Plan needs to provide a more substantive and detailed plan for educating C&I customers on the specific measures they can take to reduce energy usage as well as the corresponding rebates that are available under PPL's Phase III Plan.
2. SEF intends to address the proposed kWh rebate for both Small and Large Commercial and Industrial programs, as well as for the Government, Nonprofit, and Education Sector

Programs. SEF believes that the rebate offered should have a more restrictive range than the figures proposed in PPL's Phase III Plan.

IV. Proposed Witnesses and Evidence

SEF anticipates that it will submit written comments by John Costlow, director of SEF regarding the two above issues. Additionally, as SEF is still evaluating PPL's Phase III Plan, SEF reserves the right to submit evidence concerning additional issues and in response to matters raised by all parties.

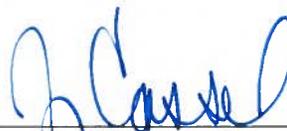
V. Proposed Schedule and Discovery Rules

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

Settlement

SEF is willing to participate in settlement discussion so as to narrow or resolve issues in dispute among the parties.

Respectfully submitted,



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Counsel for SEF

Dated: January 4, 2016