

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Metropolitan Edison Company,	:	
Pennsylvania Electric Company, Pennsylvania	:	M-2015-2514767
Power Company and West Penn Power Company	:	M-2015-2514768
For Approval of their Act 129 Phase III Energy	:	M-2015-2514769
Efficiency and Conservation Plan	:	M-2015-2514772

**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 18, 2015 Prehearing Conference Order issued by Administrative Law Judge Elizabeth H. Barnes.

I. Background

On November 23, 2015, Metropolitan Edison Company (Met-Ed), Pennsylvania Electric Company (Penelec), Pennsylvania Power Company (Penn Power), and West Penn Power Company (West Penn) (Collectively “First Energy Companies”) filed a Joint Petition for Consolidation of Proceedings and Approval of Energy Efficiency and Conservation Plans Phase III (“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”).

The Commission published a Notice of the Plan in the Pennsylvania Bulletin on December 12, 2015, 45 Pa.B. 7078, in which the Commission directed 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 filed a Petition to Intervene at each of the captioned docket numbers. Concurrently herewith, CAUSE-PA filed a letter with the Commission in lieu of formal comments. This letter generally outlines CAUSE-PA’s concerns with the Plans; however, since CAUSE-PA also intends to fully participate in the litigated portion of this proceeding through the filing of testimony it is through that process that CAUSE-PA will provide more detailed recommendations.

II. Issues to be Presented

From CAUSE-PA’s perspective, the issue at stake in this proceeding for low-income households is whether the First Energy Companies’ proposed Phase III Plan appropriately assists its economically vulnerable, low-income customers in a way that provides meaningful energy reduction and bill impacts for these households and allows the Companies to meet their energy savings targets. In addressing this overarching issue, CAUSE-PA intends to address the following:

- a. Whether low income households within each of the First Energy Companies’ service territory will obtain a share of the total energy savings that is in accord with Act 129 and the Commission’s Implementation Order. Specifically, whether 5.5% of the overall savings will come from measures directed at assisting low-income

households, and whether there is a proportionate number of measures directed at low-income households.

b. Whether the First Energy Companies' 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 the Companies' 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.

d. Whether the First Energy Companies' Plan properly focuses on direct-install measures for low-income customers as required by the Commission's Implementation Order.

e. Whether the First Energy Companies Plan provides for measures that have 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 First Energy Companies' service territory.

g. Whether the delivery of plan measures is appropriately coordinated between Conservation Service Providers (CSPs) serving low-income populations.

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. Consolidation of Proceedings

In its Petition accompanying its Plan filing, the First Energy Companies seek consolidation of each of the docketed cases. CAUSE-PA supports consolidation of the cases.

IV. 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.

V. Proposed Schedule

In consultation with the First Energy Companies, the Office of Consumer Advocate, and the Office of Small Business Advocate, CAUSE-PA proposes the following schedule:

Plans Published	December 12, 2015
Prehearing Conference	January 5, 2016
Informal Settlement Conference by Parties	January 5, 2016
Other Parties' Direct	January 12, 2016 (by noon)
Settlement Conference	January 15, 2016
Rebuttal Testimony	January 22, 2016
Evidentiary Hearing	January 27, 2016
Briefs of the Parties	February 10, 2016
Revised Plan (if necessary)	February 11, 2016
Certification of Record	February 12, 2016

VI. Public Input Hearings

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

VII. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding.

VIII. 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 FIRST CLASS MAIL

Honorable Elizabeth H. Barnes
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Dated: December 30, 2015