

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2021

Docket Nos. P-2016-2543140

**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 May 23, 2016 Prehearing Order of Administrative Law Judge Conrad A. Johnson.

I. History of the Proceeding

On May 2, 2016, Duquesne Light Company (“Duquesne” or “the Company”) filed a Petition for Approval of its Default Service Program for the period commencing June 1, 2017, through May 31, 2021. By public notice published in the Pennsylvania Bulletin on May 21, 2016, the Commission established a deadline of June 6, 2016, for formal protests, petitions to intervene, and answers. On May 23, 2016, Administrative Law Judge Conrad A. Johnson issued a Prehearing Order establishing a Prehearing Conference for June 10, 2016, with a deadline of 4:00 PM on June 8, 2016, for the filing of a prehearing memorandum. This prehearing memorandum is filed pursuant to that prehearing order.

II. Issues to be addressed

CAUSE-PA is an unincorporated association of low-income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating and telecommunication services. CAUSE-PA membership is open to moderate- and low-income individuals residing in the Commonwealth of Pennsylvania who are committed to the goal of helping low-income families maintain affordable access to utility services and achieve economic independence and family well-being.

Counsel for CAUSE-PA has reviewed Duquesne's filing and testimony. While CAUSE-PA is still formulating its positions on all of the issues presented in Duquesne's filing, it is concerned about the effect the proposed default service programs will have on the long-term affordability of service for economically vulnerable households within Duquesne's service territory. CAUSE-PA has tentatively identified the following issues presented by the filing which affect its members:

1. The Company's proposal to maintain its Standard Offer Program to refer residential customers to Electric Generation Suppliers. Petition ¶¶ 58 - 60.

2. The Company's proposal to extend shopping to CAP customers with consumer protections and conditions. Petition ¶ 62. CAUSE-PA has concerns about any CAP shopping plan that allows CAP customers to pay more than the Default Service price for electric generation supply. Evidence in service territories where CAP customers shop for generation supply shows that CAP customers, as well as the residential ratepayers who pay for the CAP program, are significantly harmed by this practice and pay millions of dollars per year without any added benefit to CAP customers or the CAP program as a whole.¹

CAUSE-PA asserts that each of these matters must be thoroughly reviewed through discovery and a hearing in order to ensure that the Company's low-income customers are not harmed and that the programs are in the public's interest. CAUSE-PA anticipates that additional issues may arise as a more comprehensive review of the Company's filing is undertaken, discovery is conducted, and other parties present evidence and testimony.

CAUSE-PA reserves the right to present evidence on any of the other issues contained in Duquesne's filing but not specifically identified above, as well as those issues raised by other parties. 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.

¹ See, e.g., Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period of June 1, 2017, through May 31, 2021, Docket No. P-2016-2526627.

III. Witnesses

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 the Presiding Officer and the parties:

Harry S. Geller, Esquire
118 Locust Street
Harrisburg, PA 17101
717-576-2282
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Mr. Geller will address the issues identified above, as well as other issues that may arise in the course of this proceeding.

IV. Discovery

CAUSE-PA is amenable to modifications in discovery and to a protective order, as necessary.

V. Settlement

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

VI. Service on CAUSE-PA

Service on CAUSE-PA may be made on its attorneys at the Pennsylvania Utility Law Project, who consent to accept by electronic delivery all documents on the deadlines for their filing as follows:

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VII. Litigation Schedule

CAUSE-PA is willing to work with all parties and the ALJ to adopt a reasonable procedural schedule.

VIII. Conclusion

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

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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June 8, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2016, I have served copies of the **Prehearing Memorandum 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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