

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation	:	
for Approval of an Energy Efficiency and	:	M-2009-2093216
Conservation Plan	:	

**PREHEARING MEMORANDUM OF PETITIONER
CITIZENS FOR PENNSYLVANIA’S FUTURE**

Petitioner Citizens for Pennsylvania’s Future (“PennFuture”) hereby submits this Prehearing Memorandum as required by the Prehearing Order made by Administrative Law Judge Susan D. Colwell dated July 1, 2009.

A. Issues to be Addressed

Subject to further development of the record through discovery, PennFuture intends to focus its participation on this issue:

1. The need for the Energy Efficiency and Conservation Plan (the “Plan”) proposed by PPL Electric Utilities Corporation (“PPL”) to include a mechanism to ensure that the eligibility thresholds, incentive levels, rebate structures, and education and training courses for suppliers for energy efficiency and conservation programs implemented under the Plan are consistent with the programs offered by other electric distribution companies (“EDCs”) in Pennsylvania.
2. PennFuture reserves its right to raise and address other issues as they may arise during the course of this proceeding.

B. Witnesses and Testimony

PennFuture has currently identified the following witness:

1. Courtney Lane
Policy Analyst
Citizens for Pennsylvania's Future
Center for Energy, Enterprise, and the Environment
212 West Gay Street
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Topics to be addressed include: the need for the Plan proposed by PPL to include a mechanism to ensure that the eligibility thresholds, incentive levels, rebate structures, and education and training courses for suppliers for energy efficiency and conservation programs implemented under the Plan are consistent with the programs offered by other EDCs in Pennsylvania. A lack of consistency among such programs is likely to cause confusion among customers and suppliers, decrease transparency, and increase program costs, thereby discouraging conservation and implementation of energy efficiency measures. Conversely, consistent statewide programs will reduce program costs through economies of scale, reduce confusion among consumers and suppliers (many suppliers operate in more than one service territory), increase transparency, and increase the effectiveness of marketing and branding, thereby encouraging more conservation and implementation of energy efficiency measures.

2. PennFuture reserves the right to identify other expert and non-expert witnesses to provide testimony on these and other issues identified during the course of this proceeding.

C. Briefing Schedule

PennFuture agrees with the briefing schedule set forth in paragraph 8 of the July 1, 2009 Prehearing Conference Order.

Respectfully submitted,

DATE: July 24, 2009

_____/s/
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CERTIFICATE OF SERVICE

I certify that I am serving a copy of the Petition to Intervene and Protest of Citizens for Pennsylvania's Future upon the persons addressed below, by email and first-class U.S. Mail:

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