

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for Approval :
of its Act 129 Energy Efficiency and Conservation : Docket No. M-2009-2093215
Plan and Expedited Approval of its Compact :
Fluorescent Lamp Program :

**PREHEARING MEMORANDUM OF PETITIONERS
CITIZENS FOR PENNSYLVANIA’S FUTURE, JOY BERGEY,
CHRISTINE KNAPP, AND HENRY ROWAN**

Petitioners Citizens for Pennsylvania’s Future (PennFuture), Joy Bergey, Christine Knapp, and Henry Rowan (collectively, Petitioners) hereby submit this Prehearing Memorandum as required by the Prehearing Conference Order in this proceeding.

A. Issues to be Addressed

Subject to further development of the record, Petitioners intend to focus their participation on this issue:

1. The need for the Energy Efficiency and Conservation Plan (the “Plan”) proposed by PECO Energy Company (PECO) 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. Petitioners reserve their right to raise and address other issues as they may arise during the course of this proceeding.

B. Witnesses and Testimony

Petitioners have 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
West Chester, PA 19380-2942
(610) 696-8051

Topics to be addressed include: the need for the Plan proposed by PECO 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. Petitioners reserve 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.

Respectfully submitted,

s/ Charles McPhedran

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