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June 7, 2010

By E-Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission v. PECO Energy Co. (Electric)
Docket No. R-2010-2161575

Dear Ms. Chiavetta:

Enclosed for filing in the above-captioned matter please find the Prehearing Memorandum of Citizens for Pennsylvania's Future, Joy Bergey, Christine Knapp, and Henry Rowan, along with a Certificate of Service.

Sincerely,

s/ Charles McPhedran

Charles McPhedran, Law Staff Chair
PennFuture

Enclosures

cc: Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2010-2161575
	:	
PECO Energy Company -- Electric Division	:	

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

In accordance with the Prehearing Conference Order in this matter dated May 21, 2010 (Order), Citizens for Pennsylvania's Future (PennFuture), Joy Bergey, Christine Knapp, and Henry Rowan (collectively, the PennFuture Petitioners), by and through their undersigned counsel, hereby file this Prehearing Memorandum. The PennFuture Petitioners filed a Petition to Intervene in this matter on May 26, 2010. Regarding the items required by the Order (p. 4):

A. Issues to be Addressed

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

1. Whether and how the proposed rate increases by PECO Energy Co. (PECO) should fund energy efficiency and conservation measures, including but not limited to programs for residential, government, and non-profit customers. As to residential customers, testimony will address multifamily homes as well as customers who are ineligible for other PECO programs and who are unable to borrow money to pay for such measures or afford them out-of-pocket.

2. Whether and how PECO's proposed rate increase should fund the accelerated development and use of solar energy.

3. PennFuture reserves its right to raise and address other issues as they may arise during the course of this proceeding.

B. Witnesses and Testimony

To date, PennFuture has identified the following witness:

1. Matthew Brown
Harcourt Brown LLC
6327 South Olive Street
Centennial, CO 80111
(720) 246-8847

Topics to be addressed by Mr. Brown include identifying ways to finance energy efficiency and conservation projects by government, nonprofit, and residential customers. This will include those programs that address multifamily homes as well as those that are undertaken by residential customers who are not served by PECO's programs for low-income customers and who are unable to borrow money to pay for such projects and also are unable to finance such projects out-of-pocket; the benefits provided by such financing; and explaining the need for PECO to use non-traditional ways to finance energy efficiency and conservation projects undertaken by its residential customers if it is to meet the energy efficiency and conservation goals imposed by Act 129.

2. PennFuture reserves the right to identify other witnesses to provide testimony on the accelerated development and use of solar energy as well as other issues identified during the

course of this proceeding, and will promptly notify the Presiding Office and the parties of any such additional witnesses.

Respectfully submitted,

6/7/10

s/ Charles McPhedran

Date

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Counsel for Petitioners PennFuture, Joy Bergey, Christine Knapp, and Henry Rowan

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PECO ENERGY COMPANY -
ELECTRIC DIVISION

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DOCKET NO. R-2010-2161575

CERTIFICATE OF SERVICE

I hereby certify and affirm that the foregoing document was filed electronically on the Commission's electronic filing system, and that I have this day served a copy of the foregoing document on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

By Electronic Mail and First-Class Mail

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