

June 10, 2010

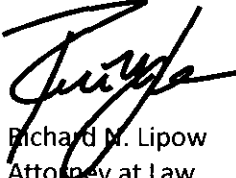
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

Re: **Pennsylvania Public Utility Commission v. PECO Energy**
Docket No. R-2010-2161575

Dear Secretary Chiavetta:

Enclosed for the filing with the Pennsylvania Public Utility Commission are the original and three (3) copies of the Pre-Hearing Memorandum of the International Dark-Sky Association in the above-captioned matter.

Respectfully submitted,

 /LS

Richard M. Lipow
Attorney at Law
629 Swedesford Road
Swedesford Corporate Center
Malvern, Pennsylvania 19355
610-251-2500
610-889-9564 fax
richard@lipowlaw.com

RECEIVED
2010 JUN 14 AM 9:56
PA.P.U.C.
SECRETARY'S BUREAU

Rate offerings; and

3. A review of the calculations used by PECO to determine the "BILLING WATTS" by PECO for unmetered outdoor streetlights.

II Proposed Witness and Subject Matter of Testimony

At present, IDA plans to present the following witness on the subject matter described below.

Leo Smith
Northeast Regional Director
International Dark-Sky Association
1060 Mapleton Avenue
Suffield, CT 06078
860 668 4000

Subject Matter: Streetlight rates POL, SL-P, SL-E and SL-S on the inclusion of 50 watt High Pressure Sodium lamps and the need for a new Midnight Option rate that will apply to unmetered streetlights that are turned off at midnight and then turned back on at 5 AM.

IDA pledges to work with all parties to develop a discovery schedule and to complete it as efficiently and expeditiously as possible, and fully supports the discovery schedule as developed thus far by the parties.

III. Settlement

IDA will participate as necessary to resolve amicably the issues presented by this proceeding.

Respectfully submitted,

BY:  /LS

Richard N. Lipow
Attorney at Law
Supreme Court ID 32399
629 Swedesford Road
Swedesford Corporate Center
Malvern, Pennsylvania 19355
610-251-2500
610-889-9564 fax
richard@lipowlaw.com

RECEIVED
2010 JUN 14 AM 9:57
P.A.P.U.C.
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION)
v.)
PECO ENERGY COMPANY)

Docket No. R-2010-2161575

CERTIFICATION OF SERVICE

I hereby certify that I have this 10th day of June 2010 served a true and correct copy of the foregoing Pre-Hearing Memorandum on behalf of the International Dark-Sky Association upon the participants listed below by First Class Mail

Adeolu A. Bakare, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
Counsel for: *Office of Trial Staff*

Anthony E. Gay, Associate General Counsel
Jack R. Garfinkle, Assistant General Counsel
PECO Energy Company
2301 Market Street S23-1
Philadelphia, PA 19103
Counsel for: *PECO Energy Company*

Thomas P. Gadsden, Esquire
Anthony C. DeCusatis, Esquire
Catherine G. Vasudevan, Esquire
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
Counsel for: *PECO Energy Company*

RECEIVED
2010 JUN 14 AM 9:57
PA.P.U.C.
SECRETARY'S BUREAU

Harry Geller, Esquire
John Gerh ard, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101.
Counsel for: *Pennsylvania Utility Law Project*

Charis Mincavage, Esquire
Barry A. Naum, Esquire
Carl J. Zwick, Esquire
McNees Wallace & Nurick
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108-1166
Counsel for: *Philadelphia Area Industrial
Energy Users Group*

Phillip A. Bertocci, Esquire
Thu B. Tran, Esquire
Jonathan Stein, Esquire
George Gould, Esquire
Community Legal Services of Philadelphia
1424 Chestnut Street
Philadelphia, PA 19102
Counsel for: *TURN and Action Alliance of
Senior Citizens*

Charles T. Joyce, Esquire
Spear Wilderman
Suite 1400
230 South Broad Street
Philadelphia, PA 19102
Counsel for: *International Brotherhood of
Electrical Workers Local 614, AFL-CIO*

Gary A. Jeffries, Esquire
Assistant General Counsel
Dominion Retail, Inc.
501 Martindale Street, Suite 400
Pittsburgh, PA 15212-5817
Counsel for: *Dominion Retail, Inc.*

Sharon E. Webb
Small Business Advocate
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101
Counsel for: *Office of Small Business Advoca
Complaint No.: C-2010-2171342*

Richard N. Lipow, Esquire
629 Swedesford Road
Malvern, PA 19355
Counsel for: *International Dark Sky
Association*

Thomas Tuffey, Esquire
Penn Future
Suite 1100
1518 Walnut Street
Philadelphia, PA 19102
Counsel for: *Penn Future*

J. Barry Davis, Esquire
Scott J. Schwarz, Esquire
City of Philadelphia Law Department
One Parkway Building, 16th Floor
1515 Arch Street
Philadelphia, PA 19102
Counsel for: *City of Philadelphia*

Todd S. Stewart, Esquire
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17101
Counsel for: *Dominion Retail, Inc.*

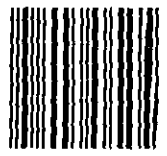
Craig Vorwald
P.O. Box 600 Exmoor Drive
Collegeville, PA 19426
Complaint No.: C-2010-2171229

Edward W. Leisenring
2575 White Horse Road
Berwyn, Pa 19312
Complaint No.: C-2010-2175072

 /LS
Richard Lipow

RECEIVED
2010 JUN 14 AM 9:57
PA.P.U.C.
SECRETARY'S BUREAU

1 DA
1060 Mapleton
Suffield CT 06078

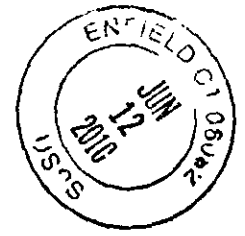


U.S. POSTAGE
PAID
ENFIELD, CT
06082
JUN 12, 10
AMOUNT

\$1.39
00055972-13

1000

17120



Rosemary Chiavetta
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg
400 North St. 2nd Floor
Harrisburg, PA 17120

FIRST CLASS