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November 9, 2010

By eFiling

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265

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

Dear Secretary Chiavetta:

Enclosed for eFiling please find the **Prehearing Memorandum of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia**, in the above-captioned matter. Copies of the enclosed have been served upon the Administrative Law Judges and other parties on the Service List.

Sincerely,

/s/ Thu Tran

Thu B. Tran, Esquire Philip A. Bertocci, Esquire Jonathan M. Stein, Esquire

Attorneys for TURN, et al.

Enclosure

cc: Administrative Law Judge Dennis J. Buckley Administrative Law Judge Elizabeth H. Barnes Service List

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company for Approval	:	
of its Act 129 Energy Efficiency and Conservation	:	M-2009-2093125
Plan and Expedited Approval of its Compact	:	
Fluorescent Lamp Program	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Prehearing Memorandum of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54:

VIA FIRST-CLASS MAIL

Honorable Dennis J. Buckley Office of Administrative Law Judge PA Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor West Harrisburg, PA 17120

Honorable Elizabeth H. Barnes Office of Administrative Law Judge PA Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor West Harrisburg, PA 17120

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Respectfully submitted,

<u>_/s/ Thu Tran_</u>

Thu B. Tran, Esquire Attorney for TURN, <u>et al</u>. COMMUNITY LEGAL SERVICES, INC. 1424 Chestnut Street Philadelphia, PA 19102 (215) 981-3777

November 9, 2010

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

Prehearing Memorandum of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia

The Tenant Union Representative Network ("TURN") and Action Alliance of Senior

Citizens of Greater Philadelphia (collectively "TURN et al."), through counsel Community Legal

Services, Inc., hereby submit this Prehearing Memorandum in the above-captioned proceeding,

pursuant to the Prehearing Conference Order of November 4, 2010, stating as follows:

TURN et al. fully support the Comments of the Pennsylvania Communities Organizing

for Change that were filed on October 15, 2010.

TURN et al. reserve the right to raise other issues as additional information becomes

available in the course of the proceeding.

At this time, TURN <u>et al</u>. have not identified a witness or witnesses for this proceeding and will inform the Commission when such decision is made.

TURN <u>et al</u>. will be represented in this case by Thu B. Tran, Esquire, Philip A. Bertocci, Esquire, and Jonathan M. Stein, Esquire. One hard copy of all documents should be served on TURN <u>et al</u>. as follows:

Thu B. Tran, Esquire Community Legal Services, Inc. 1402 Chestnut Street Philadelphia, PA 19102 Telephone: 215-981-3777 Facsimile: 267-765-6481 E-mail: <u>ttran@clsphila.org; pbertocci@clsphila.org; jstein@clsphila.org</u> Respectfully submitted,

<u>/s/ Thu Tran</u> Thu B. Tran, Esquire (Attorney ID: 83086) Philip A. Bertocci, Esquire (Attorney ID: 32329) Jonathan M. Stein, Esquire (Attorney ID: 15223)

Attorneys for TURN, et al.

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