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March 12, 2012

Via Email and Hand Delivery

Honorable Dennis J. Buckley
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Re: Petition of PECO Energy Company For Approval of its Default Service Program, Docket No.: P-2012-2283641; **PREHEARING CONFERENCE MEMORANDUM OF DOMINION RETAIL, INC. AND INTERSTATE GAS SUPPLY, INC.**

Dear Honorable Buckley:

Enclosed for filing with the Commission are the original and three (3) copies of the Prehearing Conference Memorandum of Dominion Retail, Inc. and Interstate Gas Supply, Inc. in the above-captioned docket. Copies of this Memorandum have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please contact the undersigned.

Very truly yours,

Todd S. Stewart
*Counsel for Dominion Retail, Inc. and
Interstate Gas Supply, Inc.*

TSS/alh
Enclosures

cc: Secretary Rosemary Chiavetta (via electronic filing)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC AND FIRST CLASS MAIL

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Date: March 12, 2012



Todd S. Stewart
*Counsel for Dominion Retail, Inc. and
Interstate Gas Supply, Inc.*

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company :
For Approval of its Default Service : Docket No.: P-2012-2283641
Program: :
:

**PREHEARING CONFERENCE MEMORANDUM
OF DOMINION RETAIL, INC. AND
INTERSTATE GAS SUPPLY, INC.**

BEFORE PRESIDING ADMINISTRATIVE LAW JUDGE DENNIS J. BUCKLEY:

Pursuant to a the Prehearing Order issued March 6, 2012, Dominion Retail, Inc. d/b/a Dominion Energy Solutions, (“DES”) and Interstate Gas Supply, Inc. d/b/a IGS Energy (“IGS”) by and through their counsel in the above-captioned matter, Hawke McKeon & Sniscak LLP, and hereby submit their Prehearing Conference Memorandum. The parties state as follows:

A. Representative

DES and IGS will be represented in the above-captioned matter by the following counsel. Please serve counsel copies of all pleadings hereafter filed in this matter and should be included on the service list as the entry for both parties.

Todd S. Stewart
Attorney I.D. No. 75556
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B. Discovery

DES and IGS have not yet engaged in discovery, but plan to do so shortly and will endeavor to complete discovery within adequate time to allow for the responses thereto to be incorporated into their testimony. Because of the expected compressed timeframe of this proceeding, the parties suggest that a compressed discovery schedule may also be appropriate. DES and IGS propose as an additional provision that all parties agree to accept electronic service of all documents with follow-up delivery of hard copy by first-class mail.

C. Schedule

DES and IGS have reviewed the proposed procedural schedule set forth by the Company and can agree to that schedule. To the extent that other parties seek to deviate from the proposed schedule, DES and IGS will endeavor to accommodate changes with the caveat that their counsel is not available for hearings between May 29 and June 13, 2012. Otherwise, we will work with the parties to achieve a schedule that is adequate for the needs of all.

D. Witnesses

DES and IGS intend to present the following witness to testify in this matter, however they reserve the right to call additional witnesses as may be warranted upon proper notice to Your Honor and the parties:

Thomas J. Butler
Director of Business Development
501 Martindale Street
Suite 400
Pittsburgh, PA 15212-5817
(412) 237- 4765
Thomas.J.Butler@dom.com.

E. Issues

The primary issue to be addressed by the witness in this proceeding will be whether PECO's plan as proposed will provide the benefits to the competitive market as envisioned by the Commission in its recent Order, *Investigation of Pennsylvania's Retail Electricity Market; Intermediate Work Plan*; Docket No. I-2011-2237952 (Final Order entered March 2, 2012)("RMI Order"), and whether PECO's plan adequately complies with the recommendations and requirements of the RMI Order. In particular, DES and IGS are concerned that PECO's customer referral plan may be overly restrictive and may unfairly seek to impose costs of implementation of the referral program. Likewise, DES and IGS are concerned that PECO's proposed opt-in auction may not comply with the proposal set forth by the Commission in the RMI Order. These and other issues concerning the competitive enhancements proposed by PECO and its cost recovery proposals will be the primary subject of the testimony of these witnesses, however, DES and IGS reserve the right to address other topics and to respond to issues raised in the testimony offered by other parties.

F. Evidence

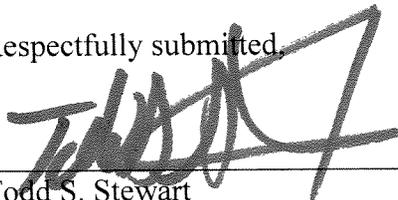
DES and IGS intend to present the testimony of the witness above as well as any exhibits and other evidence that may be pertinent thereto.

G. Settlement

DES and IGS are willing to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and suggest that a specific time be provided in the schedule for the parties to engage in such discussions.

WHEREFORE, DES and IGS respectfully submit this Prehearing Conference Memorandum in satisfaction of Your Honor's Prehearing Order dated March 6, 2012.

Respectfully submitted,



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Counsel for Dominion Retail, Inc., and, Interstate Gas Supply, Inc.

DATED: March 12, 2012