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March 12, 2012

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
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

Dear Secretary Chiavetta:

On behalf of ChoosePAWind.com enclosed please find the original of its Prehearing Memo, with the electronic filing confirmation page, with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Very truly yours,



Jeffrey J. Norton

JJN/lww  
Enclosure

cc: Hon. Dennis J. Buckley w/enc.  
Certificate of Service w/enc.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of ChoosePAWind.com's Prehearing Memo upon the participants listed below in accordance with the requirements of § 1.54 (relating to service by a participant).

**VIA EMAIL AND FIRST CLASS MAIL**

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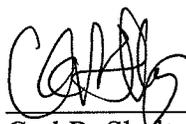
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Date: March 12, 2012



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Carl R. Shultz, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING MEMORANDUM  
OF CHOOSEPAWIND.COM**

Pursuant to 52 Pa. Code §§ 5.72-5.75 and the Prehearing Conference Order dated March 6, 2012, and subject to the granting of the Petition to Intervene filed by ChoosePAWind.com (“ChoosePAWind”)<sup>1</sup> in the above captioned proceeding, ChoosePAWind submits this Prehearing Memorandum.

**I. REPRESENTATION**

ChoosePAWind’s attorneys in this matter are:

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**II. PRESENTLY IDENTIFIED ISSUES**

ChoosePAWind is an initiative to encourage energy consumers in the Commonwealth to power their businesses and homes with energy from Pennsylvania wind farms. Participants in ChoosePAWind include developers, owners and operators of wind farms in Pennsylvania and is

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<sup>1</sup> The comments expressed in this filing represent the position of ChoosePAWind.com as an organization but may not represent the views of any particular participant or supporter of ChoosePAWind.com.

open to all electric generation suppliers (“EGSs”) that support wind energy in the Commonwealth, including the service territory of PECO.<sup>2</sup> Other participants sell wind power to large power purchasers throughout Pennsylvania.<sup>3</sup> The supporters of ChoosePAWind are organizations are committed to work towards a cleaner and stronger Pennsylvania by supporting the use of local wind energy.<sup>4</sup>

As part of the DSP Petition, PECO has proposed the elimination of its Wind Energy Service Rider. DSP Petition, at ¶ 37. As the PECO Wind program is eliminated, PECO will refer current PECO Wind customers to interested EGSs who can offer these customers a “green energy” product. DSP Petition, at ¶ 58. The implementation of such proposals directly impacts the efforts of ChoosePAWind and it has identified the following issues that should be examined in this proceeding:

- The effectiveness of PECO’s default service plan to promote “green energy products, including energy from Pennsylvania wind farms.
- The design, purpose and potential effectiveness of the PECO’s proposed elimination of its Wind Energy Service Rider, including the referral by PECO of its Wind customers to interested EGSs who can offer these customers a “green energy” product. Specifically, ChoosePAWind believes that referrals by PECO should include a reference to ChoosePAWind. Specifically, ChoosePAWind wants to make sure that there is some written notice to PECO’s customers concerning the availability of local Pennsylvania “green energy” products, and that said notice includes a reference to ChoosePAWind – as well as PA PowerSwitch and the Consumer Shopping Guides provided by the Office of Consumer Advocate (“OCA”).

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<sup>2</sup> The participants include Community Energy, Inc. (A-110152), which is licensed to sell to residential, commercial, industrial & governmental customers throughout Pennsylvania, and the Energy Cooperative Association of Pennsylvania (A-110056), which is a Broker/Marketer, Aggregator working with residential, commercial, and governmental customers in PECO’s service territory.

<sup>3</sup> <http://www.choosepawind.com/buy-pa-wind>.

<sup>4</sup> <http://www.choosepawind.com/supporters>.

At this time, ChoosePAWind continues to evaluate its position on PECO's proposals related to the Wind Program and will refine its position based on further study of the proposals, review of discovery and additional input from other parties. ChoosePAWind reserves the right to address other issues identified through its continued review and analysis of the filing or raised by other parties.

### **III. WITNESSES**

At this time, ChoosePAWind is still evaluating whether or not to present testimony in this matter. ChoosePAWind reserves the right to present a witness as may be necessary depending on the course of the proceeding and will provide the Presiding Officer as well as the other parties in this matter reasonable notice if necessary. ChoosePAWind also reserves its right to add additional witnesses or change the identity of its witnesses at any time upon appropriate notice to the Presiding Officer and the parties.

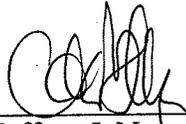
### **IV. LITIGATION SCHEDULE AND DISCOVERY RULES**

ChoosePAWind is amenable to working with the other parties in this matter to adopt a reasonable litigation schedule and/or necessary modifications to the Commission's discovery rules.

**V. SETTLEMENT**

ChoosePAWind is willing to participate in settlement discussions with any party to narrow the issues in this matter.

Respectfully submitted,



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Date: March 12, 2011

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