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September 7, 2012

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg., 2nd Fl.
400 North Street
Harrisburg, PA 17105-3265

RE: Petition of PPL Electric Utilities Corporation For an Evidentiary Hearing on the Energy Efficiency Benchmarks Established for the Period June 1, 2013 through May 31, 2016; Docket No. P-2012-2320369

Dear Secretary Chiavetta:

In accordance with the August 29, 2012 Prehearing Conference Order, enclosed for electronic filing is Converge, Inc.'s Prehearing Memorandum in the above-referenced matter. Copies have been served in accordance with the attached Certificate of Service.

Very truly yours,



Jeffrey J. Norton

JJN/jls
Enclosure

cc: Certificate of Service (w/enc)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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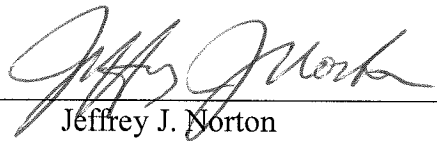
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Date: September 7, 2012



Jeffrey J. Norton

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for an Evidentiary Hearing on the Energy Efficiency Benchmarks Established for the Period June 1, 2013 through May 31, 2016 :
: Docket No. P-2012-2320369
:
:

**PREHEARING MEMORANDUM
OF COMVERGE, INC.**

Pursuant to Section 333 of the Public Utility code, 66 Pa.C.S. § 333, and in response to Prehearing Conference Order dated August 29, 2012 in this matter and, subject to the granting of the Petition to Intervene filed by Comverge, Inc. (“Comverge”), Comverge submits this Prehearing Memorandum.

I. INTRODUCTION AND BACKGROUND

On March 1, 2012, the Pennsylvania Public Utility Commission (“PUC” or “Commission”) requested comments on its ongoing efforts to implement the requirements of Pennsylvania’s Act 129 of 2008 (the Act of Act 129, effective November 12, 2008), 66 Pa.C.S. §§ 2806.1 and 2806.2. On March 16, 2012, the Commission conducted a stakeholder meeting to identify additional issues raised by its request for comments. On May 11, 2012, the Commission entered a Tentative Implementation Order seeking comments on proposed consumption reductions, guidelines for implementing Phase II of the Energy Efficiency and Conservation (EE&C) Program, and released the Statewide Evaluator’s (SWE) Market Potential Study. On June 5, 2012, the Commission held a stakeholder meeting to discuss the SWE, the baseline studies and the Market Potential Study. On August 3, 2012, the Commission entered its Implementation Order regarding the *Energy Efficiency and Conservation Program*. The

Commission established energy efficiency benchmarks for the period June 1, 2013 through May 31, 2016 (“Phase II period”). The Commission recognized the due process concerns raised by the parties and now provided the instant proceeding for interested parties. Comverge has filed an intervention in this proceeding and is awaiting Commission approval.

II. REPRESENTATION

Comverge’s attorneys in this matter are:

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III. PRESENTLY IDENTIFIED ISSUES

Comverge is a leading provider of Demand Response (“DR”) products and services to various customers. Comverge has been an active Conservation Service Provider (“CSP”) and provides complex energy management programs and related services to electric distribution companies (“EDCs”), residential and small business, large commercial and industrial customers throughout Pennsylvania, including PPL’s service territory.

Comverge has identified the following issues that should be examined in this proceeding:

- Whether the consumer-focused load management programs will suffer harmful and disruptive breaks in service if the Act 129 Programs are not continued or are interrupted.
- Whether the continuation of load management programs will provide stability in reliability planning, capture significant benefits, and avoid waste.

- Whether the targets set for PPL will materially impact the energy efficiency and conservation programs, the load management product and service development and the allocation of funds for load management programs in the service territory.

IV. WITNESSES

At this time, Comverge is still evaluating whether or not to present testimony in this matter. Comverge 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. Comverge 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.

V. LITIGATION SCHEDULE AND DISCOVERY RULES

Comverge 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.

VI. SETTLEMENT

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

Respectfully submitted,



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Date: September 7, 2012

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