

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :
for Approval of its Act 129 Phase II : M-2012-2334399
Energy Efficiency and Conservation Plan :

**PREHEARING MEMORANDUM OF THE COALITION FOR AFFORDABLE UTILITY
SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA**

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Memorandum pursuant to the November 29, 2012 Prehearing Conference Order issued by Administrative Law Judge Dennis Buckley

I. Background

On November 15, 2012, Duquesne Light Company (“Duquesne” or the “Company”) filed a Petition for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan (“Phase II EE&C Plan” or “Plan”) with the Pennsylvania Public Utility Commission (Commission) in compliance with 66 Pa.C.S. § 2806.1(b) (relating to energy efficiency and conservation programs.) In accordance with the Energy Efficiency and Conservation Program Implementation Order, entered on August 3, 2012, at Docket Nos. M-2008-2069887 and M-2012-2289411, the Commission directed that responsive pleadings along with comments and recommendations are to be filed with the Commission within 20 days of the publication of notice in the *Pennsylvania Bulletin*. Notice of Duquesne’s filing of its proposed Phase II EE&C Plan was published in the *Pennsylvania Bulletin* on December 1, 2012. 42 Pa.B. 7372. Concurrent with this prehearing memorandum, CAUSE-PA filed a Petition to Intervene.

II. Issues to be Presented

CAUSE-PA intends to address, among other issues, whether the proposed Phase II EE&C Plan ensures that the low income population, as defined in the Act, is correctly targeted; whether those low income customers obtain a share of the total energy savings that is in accord with the Commission's August 3, 2012 Order; and whether the measures employed, and methods of coordination and education are appropriate and comport with and satisfy the requirements of Act 129 and Commission Orders

III. Witnesses and Testimony

CAUSE-PA intends to present the following witness to testify in this matter, but reserves the right to call additional witnesses as may be warranted upon proper notice to Your Honor and the parties:

Thu B. Tran, Esq.
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
(215) 981-3777
ttran@clsphila.org

Ms. Tran will address the issues identified above and any other issues that may arise in the course of this proceeding.

IV. Proposed Schedule

CAUSE-PA has reviewed the schedule proposed by ALJ Buckley in his November 28, 2012 Prehearing Order and has no suggested changes.

V. Public Input Hearings

CAUSE-PA does not oppose the scheduling of public input hearing but is not presently requesting that one be scheduled.

VI. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement early in the process.

VII. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. Electronic service and one hard copy of all documents should be served on CAUSE-PA as follows:

Patrick M. Cicero, Esq.
Harry S. Geller, Esq.
PENNSYLVANIA UTILITY LAW PROJECT
118 Locust Street
Harrisburg, PA 17102
Telephone: 717-236-9486
Facsimile: 717-233-4088
E-mail: pulp@palegalaid.net

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



Patrick M. Cicero, Esq., PA ID: 89039
Harry S. Geller, Esq., PA ID: 22415
118 Locust Street
Harrisburg, PA 17101
Tel.: 717-236-9486
Fax: 717-233-4088
pulp@palegalaid.net

December 6, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on **December 6, 2012** I have served copies of the **Prehearing Memorandum of CAUSE-PA**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

FIRST-CLASS MAIL & E-MAIL

Hon. Dennis J. Buckley
Administrative Law Judge
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105
debuckley@pa.gov

Andrew S. Tubbs, Esquire
Post & Schell PC
17 North Second Street, 12th Flr.
Harrisburg, PA 17101
atubbs@postschell.com

Tishekia E. Williams, Esq.
Duquesne Light Company
411 Seventh Avenue, 16th Flr.
Pittsburgh, PA 15219
twilliams@duqlight.com

Tanya McCloskey, Esquire
Acting Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
tmccloskey@paoca.org

Steven Grey, Esquire
Acting Small Business Advocate
Office of Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101
sgrey@pa.gov

Respectfully submitted,



Patrick M. Cicero

Dated: December 6, 2012