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December 7, 2012

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
PO Box 3265
Harrisburg, PA 17105-3265

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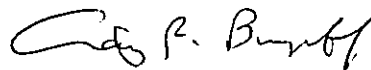
RE: Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan; Docket No. M-2012-2334388; **PREHEARING MEMORANDUM OF THE SUSTAINABLE ENERGY FUND OF CENTRAL EASTERN PENNSYLVANIA**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is an original Prehearing Memorandum of the Sustainable Energy Fund of Central Eastern Pennsylvania in the above-captioned proceeding. Copies have been served on the parties pursuant to the Certificate of Service.

Thank you for your attention to this matter. If you have any questions regarding this filing, please do not hesitate to contact my office.

Very truly yours,



Craig R. Burgraff
*Counsel for Sustainable Energy Fund
of Central Eastern Pennsylvania*

CRB/jld
Enclosure

cc: Administrative Law Judge Dennis J. Buckley (via email and via hand delivery)
Per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities :
Corporation for Approval of its Act 129 :
Phase II Energy Efficiency and : Docket No. M-2012-2334388
Conservation Plan :

**PREHEARING MEMORANDUM
OF THE SUSTAINABLE ENERGY FUND
OF CENTRAL EASTERN PENNSYLVANIA**

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The Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”), by and through its counsel, Hawke McKeon & Sniscak LLP, hereby submits its Prehearing Memorandum in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”).

I. INTRODUCTION

On November 15, 2012, PPL Electric Utilities Corporation (“PPL”) filed the Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan (“PPL Petition”). The plan was filed pursuant to the Commission’s August 3, 2012, Implementation Order¹ in which the Commission established the Phase II Energy Efficiency and Conservation Program, including the tentative adoption of specific consumption reduction targets for each subject Electric Distribution Company (“EDC”), including PPL.² This

¹ Energy Efficiency and Conservation Program Implementation Order, Docket No. M-2012-2289411 and M-2008-2069887 (August 3, 2012)(“Implementation Order”),

² These reduction targets become final for any covered EDC that did not petition the Commission for an evidentiary hearing. PPL filed for an evidentiary hearing, but did not challenge the 2.1% consumption reduction target established in the Implementation Order. The record from that proceeding has been certified to the Commission.

case was assigned to Administrative Law Judge (“ALJ”) Dennis J. Buckley. ALJ Buckley issued a Prehearing Conference Order on November 28, 2012.

The name, address and telephone number of SEF’s attorney (for purposes of the service list) is:

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II. ISSUES

SEF intends to review and may address the following issues in this proceeding, SEF reserves the right to review and address additional issues.

- Ensure that the primary function of education expenditures is for the promotion of the EE&C program and not branding of PPL Electric Utilities Corporation.
- Expansion and use of heat pump water heaters.
- Lack of renewable energy programs.
- Lack of fuel neutrality.
- Reasonableness of the Direct Install program.
- Review of PPL’s method of determining low-income participation in sector wide programs.
- Equitable distribution of programs for small commercial and industrial customers.
- Efficacy of provision of information to all participants concerning funding options including, for example, local programs and state and federal tax credits.

III. WITNESSES

SEF intends to sponsor the testimony and associated exhibits, if necessary, of a witness or witnesses who will testify on issues related to PPL's Phase II plan. SEF reserves the right to present additional witnesses during this proceeding based on information addressed during continued review of PPL's Phase II plan, and discovery, discovered subsequently or obtained from other sources. SEF reserves the right to present additional witnesses, testimony or exhibits regarding any issue which the presiding officer or the Commission may raise or desire to examine. The name and address of the witness who at this time is expected to testify is set out below:

John Costlow, Director of Technical Service
Sustainable Energy Fund of Central
Eastern Pennsylvania
1005 Brookside Road, Suite 210
Allentown, PA 18106

IV. DISCOVERY

SEF will abide by any discovery rules adopted for this proceeding.

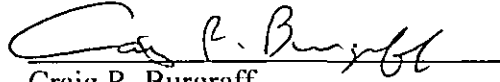
V. SCHEDULE

SEF does not recommend any changes to the ALJ's proposed tentative schedule and will abide by any schedule that is established.

VI. SETTLEMENT

SEF supports the settlement process and is amenable to meeting with PPL and the parties for the purpose of discussing settlement of the entire matter or stipulation of discrete issues.

Respectfully submitted,



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*Counsel for Sustainable Energy Fund of Central
Eastern Pennsylvania*

Dated: December 7, 2012

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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).

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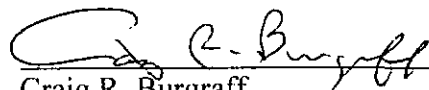
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