

January 14, 2013

Via e-file

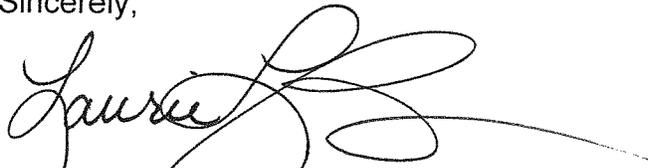
Rosemary Chiavetta
Secretary
Pennsylvania Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: PUC Docket No. M-2012-2290911
PECO's Amended Universal Service and Energy Conservation Plan for 2013-2015**

Dear Secretary Chiavetta:

Attached, please find PCADV's ***Prehearing Conference Memorandum*** in the above captioned proceeding. Copies of these documents have been served in accordance with the attached Certificate of Service.

Sincerely,



Laurie L. Baughman, Esq.

Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for Approval of its Default Service Program	:	
	:	P-2012-2283641
PECO Energy Company Universal Service and Energy Conservation Plan for 2013-2015	:	
	:	M-2012-2290911

**PREHEARING MEMORANDUM OF THE PENNSYLVANIA COALITION AGAINST
DOMESTIC VIOLENCE**

The Pennsylvania Coalition Against Domestic Violence, by and through its undersigned counsel, hereby files this Prehearing Memorandum pursuant to the January 9, 2012, Prehearing Conference Order issued by Administrative Law Judge Cynthia Fordham.

I. Background

On October 15, PECO filed a Revised Universal Service Plan for 2013-2015 with the PUC. On November 8, the PUC issued a Tentative Order requesting comments on PECO's revised plan. In relevant part, the PUC requested comments on PECO's CAP Plan, including PECO's Social Security number requirement and its requirement that Customer Assistance Program (CAP) applicants submit notarized income verification forms. On November 28, PCADV submitted comments to address its concern that PECO's revised plan would pose safety and economic stability risks to victims of domestic violence, especially foreign-born victims. PCADV's comments specifically addressed its concern for two discreet aspects of the plan: (1) to require customers to provide social security numbers for each household member in order to enroll in its CAP for low income customers, and (2) to require CAP applicants to submit a notarized income verification form at a cost to the customer. On January 3, the PUC issued a

and (2) to require CAP applicants to submit a notarized income verification form at a cost to the customer. On January 3, the PUC issued a Secretarial Letter ordering a hearing on the revised plan – including the issues with PECO’s CAP requirements outlined below – before a PUC Administrative Law Judge.

II. Issues to be Presented

Based on the Commission’s Tentative Order and the comments of interested parties, PCADV identified the following issues that it plans to address at this proceeding:

- (1) Whether PECO’s Social Security Number requirement poses substantial privacy concerns and acts as a barrier for victims of domestic violence seeking assistance from PECO’s CAP?
- (2) Whether PECO’s Social Security Requirement acts as bar to many foreign-born victims of domestic violence who would otherwise qualify for PECO’s CAP?
- (3) Whether requiring notarization of an individual’s lack of income is unnecessary and burdensome and acts as a bar for victims of domestic violence to access PECO’s CAP?

PCADV reserves the right to raise further issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties, should such a response be necessary.

III. Witnesses and Testimony

PCADV intends to present the following witnesses 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 in this proceeding

Nicole Lindemyer
Policy Manager
Pennsylvania Coalition Against Domestic Violence
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Ms. Lindemyer and *either* Ms. Beiber-Locke or Ms. Grimm will address the issues identified above and any other issues that may arise in the course of this proceeding.

IV. Proposed Schedule

PCADV is aware of the expedited time frame established by the Commission for this proceeding and will work with the ALJ and other parties to come to a schedule that suits the needs of all of the parties and the Commission. PCADV supports the submission of the testimony of witnesses in writing in advance of the hearing.

V. Settlement

PCADV 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.

VI. Service on PCADV

PCADV consents to accept electronic delivery of documents on the deadlines for their filing.

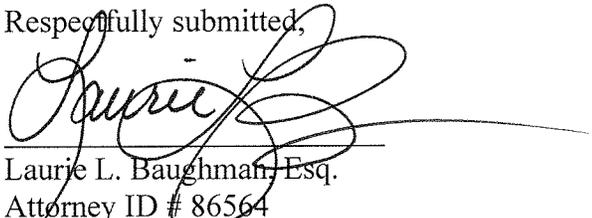
Electronic service of all documents should be served on PCADV as follows:

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VII. Conclusion

PCADV respectfully requests that its Prehearing Memorandum be entered into the record of this proceeding.

Respectfully submitted,



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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PECO Energy Company Universal Service and Energy Conservation Plan for 2013-2015	:	
	:	M-2012-2290911

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Prehearing Conference Memorandum of The Pennsylvania Coalition Against Domestic Violence**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND FIRST CLASS MAIL

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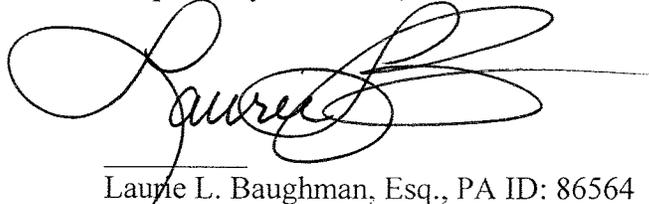
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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Laurie L. Baughman". The signature is fluid and cursive, with a horizontal line extending to the right from the end of the signature.

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Dated: January 14, 2013