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April 9, 2014

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**Re: Petition of PECO Energy Company for Approval of its Default Service Program  
For the Period From June 1, 2015 through May 31, 2017  
Docket No. P-2014-2409362**

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Conference Memorandum of the PECO Energy Suppliers Group ("PESG") in the above-captioned matter. This document has been e-filed at the Pennsylvania Public Utility Commission's website. Copies have been served in accordance with the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me. Thank you.

Best Regards,

STEVENS & LEE



Michael A. Gruin

Encl.

cc: Honorable Cynthia Fordham, Administrative Law Judge  
Certificate of Service

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A PROFESSIONAL CORPORATION

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for Approval :  
of its Default Service Program For the Period From : Docket No. P-2014-2409362  
June 1, 2015 through May 31, 2017 :

**PREHEARING CONFERENCE MEMORANDUM OF  
THE PECO ENERGY SUPPLIERS GROUP**

Pursuant to 52 Pa. Code § 5.22, the PECO Energy Suppliers Group (“PESG”), hereby submits its Pre-Hearing Conference Memorandum in this matter.

**I. INTRODUCTION**

On March 10, 2014, PECO Energy Company (“PECO”) filed a Petition requesting approval of its Default Service Programs for the period of June 1, 2015 through May 31, 2017. The Petition was filed pursuant to Section 2807(e) of the Public Utility Code.

On April 1, 2014, PESG filed its Petition to Intervene in this matter. PESG is an ad hoc group of electricity generation suppliers (“EGSs”) licensed to serve customers in PECO territory. PESG’s members are set forth on the attached Appendix. As necessary, PESG will update the Appendix during the course of this proceeding as needed to reflect any changes in membership. PESG is represented in this matter by the following counsel:

Michael A. Gruin, Esq.  
PA ID No. 78625  
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## **II. ISSUES**

### **1. Procedural and Discovery Schedule**

PESG is amenable to the procedural schedule proposed by PECO in this matter.

### **2. Settlement**

PESG is amenable to discussing settlement of any and all of the issues raised by the parties to this proceeding.

### **3. Issues and Witnesses**

PESG is continuing to review and analyze the proposed Default Service Plan, and reserves the right to submit Direct, Rebuttal, and Surrebuttal Testimony regarding all of the issues raised by the PECO's Default Service Plan, including, but not limited to, PECO's proposed default supply procurement schedule and the retail market enhancements proposed by PECO. PESG has not identified its proposed witnesses for this proceeding at this time, and will update this Memorandum to provide the names of its witnesses once they are identified.

### **4. Other Matters**

PESG is amenable to the exchange of exhibits prior to hearing, the obtaining of stipulations of fact, and other similar steps to facilitate the conduct of the hearing. PESG is agreeable to reasonable deadlines for discovery, as well as reasonable modifications to the Commission's regulations regarding discovery. PESG consents to accept electronic service of all documents on the deadlines for their delivery, followed by hard copy delivery by first class mail to its counsel.

Respectfully submitted,

STEVENS & LEE, P.C.



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Attorneys for  
PECO Energy Suppliers Group

Dated: April 9, 2014

**APPENDIX A**  
(updated April 8, 2014)

IDT Energy, Inc.

North American Power and Gas, LLC

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served by First Class U.S. Mail and Electronic Mail a true and correct copy of the foregoing document upon the parties listed below, in accordance with the requirements of § 1.54 (relating to service by a party)

<p>Anthony Gay, Esq.                  Exelon Business Services                  2301 Market St., S23-1                  PO Box 8699                  Philadelphia, PA 19101-8699</p>	<p>Thomas P. Gadsden, Esq.                  Kenneth Kulak, Esq.                  Brooke E. McGlinn, Esq.                  Morgan Lewis &amp; Bockius LLP                  1701 Market Street                  Philadelphia, PA 19103-2921</p>
<p>Chrisy Appleby, Esq.                  Office of Consumer Advocate                  5th Floor Forum Place                  555 Walnut Street                  Harrisburg, PA 17101-1923</p>	<p>Elizabeth Triscari, Esq.                  Office of Small Business Advocate                  Suite 1102 Commerce Building                  300 North Second Street                  Harrisburg, PA 17101</p>
<p>Johnnie Simms, Esq.                  PA PUC Bureau of Investigation and                  Enforcement                  PO Box 3265                  Harrisburg, PA 17105</p>	<p>Charis Mincavage, Esq.                  McNeese Wallace &amp; Nurick                  100 Pine Street                  PO Box 1166                  Harrisburg, PA 17108</p>
<p>Stephen L. Huntoon, Esquire                  Nextera Energy Inc.                  801 Pennsylvania Ave. NW                  Suite 220                  Washington, DC 20004</p>	<p>David Zambito, Esq.                  Cozen O'Connor                  305 North Front Street, Suite 400                  Harrisburg, PA 17101</p>
<p>Harry Geller, Esq.                  Patrick Cicero, Esq.                  Pennsylvania Public Utility Law Project                  118 Locust St.                  Harrisburg, PA 17101</p>	<p>Todd Stewart, Esq.                  Hawke, McKeown, &amp; Sniscak, LLP                  100 North Tenth St.                  PO Box 1778                  Harrisburg, PA 17105</p>
<p>Charles E. Thomas, III, Esq.                  Thomas, Long, Niesen &amp; Kennard                  212 Locust St., Suite 500                  PO Box 9500                  Harrisburg, PA 17108</p>	<p>Deanne O'Dell, Esq.                  Eckert Seamans, Cherin &amp; Mellott, LLC                  213 Market St. 8<sup>th</sup> Fl                  Harrisburg, PA 17101</p>

*Michael A. Gruin*

April 9, 2014

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Michael A. Gruin, Esq.