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April 9, 2014

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

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 please find the Retail Energy Supply Association's Prehearing Memorandum in the above-referenced matter. All parties have been served in accordance with the attached Certificate of Service.

Sincerely,



Sarah C. Stoner

Enclosure

cc: Hon. Cynthia Fordham w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Retail Energy Supply Association's Prehearing Memorandum upon the participants listed below in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA EMAIL AND FIRST CLASS MAIL

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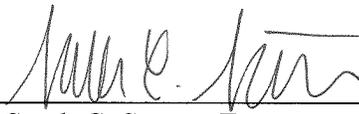
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Dated: April 9, 2014



Sarah C. Stoner, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for : Docket No. P-2014-2409362
approval of its Default Service Program :
for the period from June 1, 2015 through :
May 31, 2017 :

**PREHEARING MEMORANDUM
OF RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to 52 Pa. Code §§ 5.72-5.75, the public notices published in the Pennsylvania Bulletin on March 22, 2014 and the Prehearing Order dated April 3, 2014, the Retail Energy Supply Association (“RESA”)¹ submits this Prehearing Memorandum.

I. PROPOSED PLAN AND SCHEDULE OF DISCOVERY

RESA is amenable to working with the other parties in this matter to adopt a reasonable proposed plan and schedule of discovery.

II. POSSIBILITY OF SETTLEMENT

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

¹ RESA’s members include: AEP Energy, Inc.; Champion Energy Services, LLC; ConEdison Solutions; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; GDF SUEZ Energy Resources NA, Inc.; Homefield Energy; IDT Energy, Inc.; Integrys Energy Services, Inc.; Interstate Gas Supply, Inc. dba IGS Energy; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; NRG Energy, Inc.; PPL EnergyPlus, LLC; Stream Energy; TransCanada Power Marketing Ltd. and TriEagle Energy, L.P. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

III. PRESENTLY IDENTIFIED ISSUES

RESA is a trade association of power marketers, independent power producers, and a broad range of companies within the Mid-Atlantic marketplace, each of whom support the electric services industry and seek to develop a more competitive power industry. RESA members are licensed to sell electric energy in the markets of Pennsylvania's major electric distribution companies, including the service territory of PECO. RESA has identified the following issues that should be examined in this proceeding:

- Whether PECO's overall default service supply plan is consistent with the Commission's regulations and the Public Utility Code
- The effectiveness of PECO's default service plan to promote retail market development for the benefit of consumers in PECO's service territory
- Whether PECO's proposal to reconcile the over/undercollection component of the GSA on a semi-annual basis is just and reasonable
- Whether PECO's proposal to revise the allocation of responsibility for PJM meter error correction charges and generation deactivation charges is just and reasonable
- The current operation and continuation of PECO's existing Standard Offer Program from June 1, 2015 through May 31, 2017

At this time, RESA continues to evaluate its position on and will refine its position based on further study of the proposals, review of discovery and additional input from other parties. RESA reserves the right to address other issues identified through its continued review and analysis of the filing or raised by other parties.

IV. AMOUNT OF HEARING TIME NEEDED

At this time, RESA continues to evaluate the issues in this proceeding and is currently unable to estimate the amount of hearing time that may be needed.

V. WITNESSES

At this time, RESA expects to present the testimony of the following witness:

Richard J. Hudson Jr.
Director Regulatory & Legislative Affairs
ConEdison Solutions
Pennsylvania State Chairman, RESA

The purpose of Mr. Hudson's testimony will be to address the issues identified above and offer recommendations for improvement. RESA reserves the right to amend this witness list 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 such amendment becomes necessary.

VI. SCHEDULE FOR SUBMISSION OF TESTIMONY, HEARINGS AND BRIEFS

RESA will cooperate with the other parties and the ALJ to facilitate a workable litigation schedule.

VII. SERVICE OF DOCUMENTS

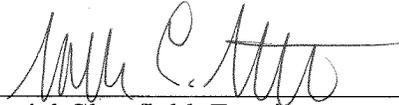
RESA agrees to electronic service of all documents to the email addresses below with one (1) hard copy mailing of all documents sent to Eckert Seamans.

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Sarah Stoner – sstoner@eckertseamans.com

Respectfully submitted,



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Date: April 9, 2014

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