

Citizens for Pennsylvania's Future
200 First Avenue, Suite 200
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May 30, 2014

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of Duquesne Light Company for approval of Default Service
Plan for the Period June 1, 2015 through May 31, 2017

Docket No. P-2014-2418242

Dear Secretary Chiavetta:

Enclosed, please find an original copy of Citizens for Pennsylvania's Future Prehearing Memorandum in the above captioned matter.

Copies are being served in accordance with the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Heather M. Langeland". The signature is written in a cursive style with a large initial 'H'.

Heather M. Langeland

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company	:	
for Approval of a Default Service Plan	:	P-2014-2418242
for the Period June 1, 2015	:	
Through May 31, 2017	:	

**PREHEARING MEMORANDUM OF
CITIZENS FOR PENNSYLVANIA’S FUTURE**

Citizens for Pennsylvania’s Future (“PennFuture”) hereby submits this Prehearing Memorandum in the above-captioned proceeding. PennFuture intends to participate in this proceeding as an “active” party.

I. HISTORY OF THE PROCEEDING

On April 24, 2014, Duquesne Light Company (“Duquesne”) filed with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) a Petition for approval of its Default Service Program (“DSP”) for the period June 1, 2015 through May 31, 2017 (“Petition”). The DSP would apply to all retail customers in Duquesne’s service territory.

The Prehearing Conference for the instant proceeding will be held on June 2, 2014. Administrative Law Judge Katrina L. Dunderdale is the presiding officer.

PennFuture submits this Prehearing Conference Memorandum in compliance with ALJ Dunderdale’s Prehearing Order.

II. ANTICIPATED ISSUES AND SUB-ISSUES

The Petitioner, on behalf of its members and the public interest, have an interest in ensuring that electric distribution companies (“EDC”) enter into long term contracts for Alternative Energy Portfolio Standards (“AEPS”) compliance. EDC default service plans cover electricity generation procurement, among other things, for customers that do not switch to competitive electricity providers. Long term contracts for AEPS compliance lowers renewable energy project financing costs and facilitates cost effective renewable energy development envisioned by the 2004 AEPS law. As such, long term contracts would be beneficial to ratepayers. PennFuture intends to review and analyze the Duquesne Petition as it pertains to long term contracting for AEPS credits to meet default service load compliance requirements.

PennFuture is also examining the Petition to determine compliance with Title 66 and 52 PA Code requirements of a prudent mix of spot market, short term and long term contract requirements designed to ensure adequate and reliable service at the least cost to customers over time. PennFuture is supportive of promoting competitive markets, but has concerns about overreliance on spot and short term contracts.

PennFuture reserves the right to raise additional issues as they may come to light through the discovery and review process.

III. PROPOSED WITNESSES

PennFuture intends to present the testimony of Mike Speerschneider in this matter to testify as to the above noted issues. Mr. Speerschneider has a business address of :
EverPower Wind Holdings, Inc. 1251 Waterfront Place, 3rd Floor, Pittsburgh, PA 15222.
PennFuture also intends to participate in this proceeding through the submission of

discovery, the cross-examination of other parties' witnesses, participation in settlement negotiations as they occur, and the submission of briefs, exceptions and reply exceptions, as necessary.

IV. PROPOSED SCHEDULE AND DISCOVERY RULES

PennFuture will work with the parties to develop an appropriate procedural schedule. However, based on communications with the parties and the Court, it appears that this matter will have a hearing date starting the last week in August. To accommodate the undersigned's schedule, it is respectfully requested that PennFuture's witness be called, if necessary, on the first day of the hearings if they are to begin the last week in August. PennFuture will cooperate to develop discovery rules in accordance with the Commission's regulations and any ALJ directives.

V. POSSIBILITY OF SETTLEMENT

PennFuture is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, reading "Heather M. Langeland", written over a horizontal line.

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Counsel for Petitioner PennFuture

DATED: May 30, 2014

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company	:	
For Approval of a Default Service Plan	:	P-2014-2418242
Service Program and Procurement	:	
For the Period June 1, 2015	:	
Through May 31, 2017	:	

CERTIFICATE OF SERVICE

I, Heather M. Langeland, do hereby certify that a true and accurate copy of the foregoing “PREHEARING MEMORANDUM OF CITIZENS FOR PENNSYLVANIA’S FUTURE” was served on May 30, 2014 on the following by depositing a copy of the same in the United States mail, postage prepaid and addressed to:

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