

Citizens for Pennsylvania's Future  
200 First Avenue, Suite 200  
Pittsburgh, PA 15222  
(412) 456-2901

October 6, 2014

Secretary Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor North  
P.O. Box 3265  
Harrisburg, PA 17015-3265

Re: Petition of Pennsylvania Power Company for approval of Base Rate Increase and various Riders, Docket No. R-2014-2428744

Dear Secretary Chiavetta:

Enclosed, please find an original copy of "PREHEARING MEMORANDUM OF ENVIRONMENTAL DEFENSE FUND AND CITIZENS FOR PENNSYLVANIA'S FUTURE" in the above captioned matter.

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

Sincerely,



Heather M. Langeland

cc. Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC  
UTILITY COMMISSION,

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Docket No. R-2014-2428744

v.

PENNSYLVANIA POWER  
COMPANY

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**PREHEARING MEMORANDUM OF ENVIRONMENTAL  
DEFENSE FUND AND CITIZENS FOR PENNSYLVANIA’S FUTURE**

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Environmental Defense Fund (“EDF”) and Citizens for Pennsylvania’s Future (“PennFuture”) hereby submit this Prehearing Memorandum in the above-captioned proceeding. EDF and PennFuture intend to participate in this proceeding as “active” parties.

**I. HISTORY OF THE PROCEEDING**

On or about August 4, 2014, Pennsylvania Power Company (“PPC”), pursuant to Section 1308 of the Pennsylvania Public Utility Code, 66 Pa.C.S. 1308, petitioned the Pennsylvania Public Utility Commission (“Commission”) for approval of a Base Rate Increase and various Riders. EDF and PennFuture jointly petitioned to intervene on October 3, 2014.

The Prehearing Conference for the instant proceeding will be held on October 8, 2014. Administrative Law Judge Dennis J. Buckley is the presiding officer.

EDF and PennFuture submit this Prehearing Conference Memorandum in compliance with ALJ Buckley's Prehearing Order.

## **II. PROPOSED PLAN AND SCHEDULE OF DISCOVERY**

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

## **III. POSSIBILITY OF SETTLEMENT**

EDF and PennFuture are willing to participate in settlement discussions with any party to narrow the issues in this matter.

## **IV. ANTICIPATED ISSUES AND SUB-ISSUES**

The Petitioners, on behalf of their members and the public interest, have an interest in several issues, as described more fully below.

Petitioners are still in the process of reviewing the filings, and anticipate addressing such issues as: rate design, distribution grid planning and modernization, distributed generation policy, smart grid planning and functionality, Volt/VAR Optimization, dynamic pricing, usage data and access, TOU rate design, net metering, customer utilization of advanced grid functionality, utility performance incentives, energy efficiency and demand response, LED lighting, cost-benefit analysis policy, third-party access to energy usage data, environmental and performance metrics, and other issues. EDF and PennFuture reserve the right to raise additional issues as they may come to light through the discovery and review process.

## **V. AMOUNT OF HEARING TIME NEEDED**

At this time, PennFuture continues to evaluate the issues in this proceeding. However, it is anticipated that the amount of hearing time could vary from two to three days.

## **VI. WITNESSES**

Petitioners are still in the process of identifying witnesses in this proceeding. However, at this time, it is anticipated that Petitioners will call Dick Munson, Ronny Sandoval, and Beia Spiller. Petitioners anticipate additional witnesses, however, at this time they are still reviewing the filings and identifying witness needs. Petitioners will inform all parties of the identity of witnesses.

EDF and PennFuture also intend 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.

## **VII. SCHEDULE FOR SUBMISSION OF TESTIMONY, HEARINGS AND BRIEFS**

EDF and PennFuture will work with the parties to develop an appropriate procedural schedule. EDF and PennFuture will cooperate to develop discovery rules in accordance with the Commission's regulations and any ALJ directives.

## **VIII. SERVICE OF DOCUMENTS**

EDF and PennFuture agree to electronic service of all documents to the email addresses below. Hard copies may be forwarded to the following addresses:

Michael Panfil  
John Finnigan  
EDF  
1875 Connecticut Ave., N.W.  
Washington, DC 20009  
Phone: (202) 572-3280  
Fax: (202) 234-6049  
[mpanfil@edf.org](mailto:mpanfil@edf.org)  
[jfinnigan@edf.org](mailto:jfinnigan@edf.org)

Heather Langeland  
200 First Avenue, Suite 200  
Pittsburgh, PA 15222  
[langeland@pennfuture.org](mailto:langeland@pennfuture.org)

Respectfully submitted,

  
Michael Panfil (by HML)

Michael Panfil  
John Finnigan  
EDF  
1875 Connecticut Ave., N.W.  
Washington, DC 20009  
Phone: (202) 572-3280  
Fax: (202) 234-6049  
[mpanfil@edf.org](mailto:mpanfil@edf.org)  
[jfinnigan@edf.org](mailto:jfinnigan@edf.org)  
Counsel for Petitioner EDF

  
Heather M. Langeland

Heather M. Langeland, Staff Attorney  
Pa. Bar Id. No. 207387  
200 First Street, Suite 200  
Pittsburgh, PA 15222  
Phone: 412-456-2901  
Fax: 412-258-6685  
[langeland@pennfuture.org](mailto:langeland@pennfuture.org)

Counsel for Petitioner PennFuture



Tori L. Giesler, Esq.  
Lauren M. Lepkoski, Esq.  
First Energy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, PA 19612-6001

Daniel G. Asmus, Esq.  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101

Senator Timothy J. Solobay  
Senate of Pennsylvania – 46<sup>th</sup> District  
Senate Box 203046  
Room 15-EW  
The State Capitol  
Harrisburg, PA 17120

Senator Pam Snyder  
Senate of Pennsylvania – 50<sup>th</sup> District  
Senate Box 203046  
Room 15-EW  
The State Capitol  
Harrisburg, PA 17120-3046

Bradley A. Bingaman, Esq.  
FirstEnergy  
76 South Main Street  
Akron, OH 44308-1890

Susan E. Bruce, Esq.  
Vasiliki Karandikas, Esq.  
Teresa K. Schmittberger, Esq.  
Elizabeth P. Trinkle, Esq.  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

Scott J. Rubin, Esq.  
333 Oak Lane  
Bloomsburg, PA 17815-2036

Karla Lamison  
4238 Guitonville Rd.  
Marienville, PA 16239

Joan E. Group  
1040 Rosewood Drive  
Altoona, PA 16601

Bruce R. Hilbert  
Sara P. Hilbert  
441 Orchard Road  
Fleetwood, PA 19522

Paul N. Bombaci  
5 Governours Place  
York, PA 17402

James F. Mrozek  
1199 Cleland Mill Road  
New Castle, PA 16102

  
Heather M. Langeland