

Citizens for Pennsylvania's Future  
200 First Avenue, Suite 200  
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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 Metropolitan Edison Company for approval of Base Rate Increase and various Riders, Docket No. R-2014-2428745

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-2014-2428745

v.

METROPOLITAN EDISON  
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, Metropolitan Edison Company (“MEC”), 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:

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Respectfully submitted,

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC	:	
UTILITY COMMISSION,	:	
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	:	Docket No. R-2014-2428745
v.	:	
	:	
	:	
METROPOLITAN EDISON	:	
COMPANY	:	

**CERTIFICATE OF SERVICE**

I, Heather M. Langeland, do hereby certify that a true and accurate copy of the foregoing document was served on all parties of record this 6th day of October, 2014 by depositing a copy of the same in the United States mail, postage prepaid and addressed to:

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