

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

November 10, 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: Pa. P.U.C. v. West Penn Power Company – Docket No. R-2014-2428742

Dear Secretary Chiavetta:

Enclosed for filing, please find the Supplemental Prehearing Memorandum of Citizens for Pennsylvania's Future and Environmental Defense Fund.

Sincerely,

  
Heather M. Langeland

cc. Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC  
UTILITY COMMISSION

v.

PENNSYLVANIA POWER  
COMPANY

Docket No. R-2014-2428744

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

Now comes Citizens for Pennsylvania’s Future (“PennFuture”) and Environmental Defense Fund (“EDF”), by counsel, and submits the following supplemental prehearing memorandum:

PennFuture and EDF intend to present the testimony of the following individuals in this proceeding:

**Ronny Sandoval:**

Mr. Sandoval will be submitting testimony regarding initiatives relating to grid modernization. This testimony will include but not be limited to Volt/VAR, grid optimization, and smart grid technology.

**Dick Munson:**

Mr. Munson will be submitting testimony regarding policies that promote cost-effective clean energy and energy efficiency. He will also testify as to the benefits that can be

achieved through advancements including but not limited to open access to data, rate plans, and metrics.

**Patrick Gormley**

Mr. Gromley will be submitting testimony regarding the tariff as it relates to LED lighting for municipal street lights. He will also testify as to the public benefits that can be achieved through this tariff proceeding.

**George Woodbury**

Mr. Woodbury will be submitting testimony regarding the tariff as it relates to LED lighting for municipal street lights. He will also testify as to the public benefits that can be achieved through this tariff proceeding.

Respectfully submitted,

  
Michael Panfil

John Finnigan

EDF

1875 Connecticut Ave., N.W.

Washington, DC 20009

Phone: (202) 572-3280

Fax: (202) 234-6049

Counsel for Petitioner EDF



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

Counsel for Petitioner PennFuture

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC  
UTILITY COMMISSION,

v.

METROPOLITAN EDISON  
COMPANY, PENNSYLVANIA  
ELECTRIC COMPANY,  
PENNSYLVANIA POWER  
COMPANY, AND WEST PENN  
POWER COMPANY

Docket No. R-2014-2428745  
R-2014-2428743  
R-2014-2428744  
R-2014-2428742

**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 10th day of November, 2014 by depositing a copy of the same in the United States mail, postage prepaid and addressed to:

Allison C. Kaster, Esq.  
Carrie B. Wright, Esq.  
Scott B. Granger, Esq.  
Bureau of Investigation and Enforcement  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105

Darryl A. Lawrence  
Aron J. Beatty  
Kristine Robinson  
Brandon J. Pierce  
Lauren M. Burge  
Office of Consumer Advocate  
555 Walnut Street 5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

Thomas P. Gadsden, Esq.

Anthony DeCusatis, Esq.  
Catherine G. Vasudevan, Esq.  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921

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

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

Thomas T. Niesen  
Thomas, Niesen & Thomas LLC  
212 Locust Street, Suite 600  
Harrisburg, PA 17101

Thomas Sniscak  
William E. Lehman  
Hawke, McKeon & Sniscak LLP  
P.O. Box 1778  
100 North Tenth Street  
Harrisburg, PA 17105-1778

David J. Dulick  
General Counsel  
Pennsylvania Rural Electric Association  
Allegheny Electric Cooperative, Inc.  
212 Locust Street  
P.O. Box 1266  
Harrisburg, PA 17108-1266

David F. Boehm  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, OH 45202

Michael Panfil  
John Finnigan  
EDF  
1875 Connecticut Avenue, N.W.  
Washington, DC 20009

Harry S. Geller  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101-1414

Donald R. Wagner  
Stevens & Lee  
111 North Sixth Street  
Reading, PA 19601

  
Heather M. Langeland