

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, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17015-3265

Re: Pa. P.U.C. v. Metropolitan Edison Company – Docket No. R-2014-2428745

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.

METROPOLITAN EDISON
COMPANY

Docket No. R-2014-2428745

**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.

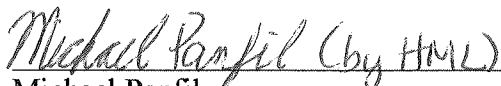
Patrick Gormley

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

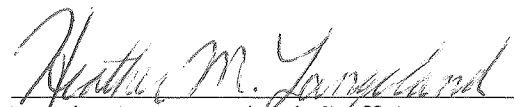
Mr. Woodbury will be submitting testimony regarding the tariff as it relates to LED lighting for municipal street lights. He will also testify as to the public benefits that can be achieved through this tariff proceeding.

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 5th 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