



May 7, 2015

Rosemary Chiavetta, Secretary
Pennsylvania Public Utilities Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**RE: Pennsylvania Public Utility Commission v. PECO Energy Company
Docket R-2015-2468981, C-2015-2475585, C-2014-2477974**

Attention Filing Center,

Please find enclosed for filing the *Motion for Leave to Appear Pro Hac Vice, Notice of Appearance, Petition to Intervene of The Alliance for Solar Choice* and the *Prehearing Memorandum on Behalf of The Alliance for Solar Choice*. Copies will be provided as indicated on the Certificate of Service.

Please contact me if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink, appearing to read "Kim Kooles".

Kimberly L. Kooles
Research Analyst
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401 Harrison Oaks Blvd., Suite 100
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al.	:	
	:	
v.	:	R-2015-2468981
	:	C-2015-2475585
PECO Energy Company	:	C-2014-2477974

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 5.103 of the rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission and Rule 301(b) of the Pennsylvania Bar Admission Rules, Counsel of Record for The Alliance for Solar Choice (TASC), Joseph Minott respectfully requests the Presiding Administrative Law Judge to enter an Order granting admission *pro hac vice* to David R. Wooley and Jacob J. Schlesinger as counsel for TASC for all purposes in relations to these proceedings. In support of this Motion, the Movant, Joseph Minott, avers as follows:

1. Pursuant to PUC Rule 1.24, the Movant has entered his appearance as counsel of record for The Alliance for Solar Choice in this proceeding, and is an active member of the Bar of the Commonwealth of Pennsylvania (Attorney Registration No. 36463).
2. David Wooley serves as of counsel to the firm of Keyes, Fox & Wiedman LLP at its offices located at 436 14th Street, Suite 1305, Oakland, California 94612.
3. Mr. Wooley is a 1975 graduate of the Rutgers University School of law. He was admitted to practice law in the Commonwealth of Pennsylvania in 1975 and is currently on inactive status. Mr. Wooley is a member in good standing and admitted to practice law in the states of New York (Attorney # 1828862) and New Jersey (Attorney # Bar # 009881975). He was admitted to practice law in New Jersey in 1975, and to practice in

NY in 1982. Mr. Wooley was admitted to practice law in West Virginia in 1977, and is currently on inactive status (Attorney # 4135). Mr. Wooley has been admitted to and is a member in good standing to practice before the U.S. Supreme Court, and several United States Courts of Appeals, including the Third Circuit. Mr. Wooley has been admitted to practice before numerous federal district courts including the Eastern District of Pennsylvania.

4. Mr. Wooley has many years experience with rate cases and electric power rulemaking proceedings before state utility commissions in New York, New Jersey, North Carolina (via motion to appear *pro hac vice*) and California. He formerly served as an Assistant Attorney General in the New York State Department of Law, and as Professor for Energy and Environmental Law at Pace University School of Law in New York.

5. Mr. Wooley has never been suspended, disbarred or been the subject of disciplinary proceedings in Pennsylvania or any other state.

6. Mr. Wooley is also, by separate motion, seeking permission to appear *pro hac vice* in the PPL general rate case (Docket No R-2015-2469275) currently pending before this Commission. Otherwise, he has not sought permission to appear *pro hac vice* in any other judicial or administrative proceeding in the Commonwealth of Pennsylvania.

7. Mr. Wooley agrees to be bound by and comply with applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, the Pennsylvania Rules of Professional Conduct and the Rules of this Commission. Mr. Wooley agrees to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during his appearance in this matter.

8. Mr. Wooley has consented to the appointment of Joseph Minott as his sponsor, who will serve as counsel of record for The Alliance For Solar Choice in this matter.
9. Jacob J. Schlesinger serves as an associate to the firm of Keyes, Fox & Wiedman LLP at its offices 1400 16th St. 16 Market Square, Suite 400 Denver, Colorado, 80202.
10. Mr. Schlesinger graduated from the University of Denver, Sturm College of Law in 2009. He was admitted to practice law in the State of Colorado in 2009 and is currently on active status and is a member in good standing (Colorado Attorney # 41455).
11. Mr. Schlesinger has over five years experience with rate cases and electric power rulemaking proceedings before state utility commissions. He formerly served as an Assistant Attorney General in the State of Colorado working primarily on utility regulatory law issues.
13. Mr. Schlesinger has never been suspended, disbarred or been the subject of disciplinary proceedings in Colorado or any other state.
14. Mr. Schlesinger is also, by separate motion, seeking permission to appear *pro hac vice* in the PPL general rate case (Docket No R-2015-2469275) currently pending before this Commission. Otherwise, he has not sought permission to appear *pro hac vice* in any other judicial or administrative proceeding in the Commonwealth of Pennsylvania.
15. Mr. Schlesinger agrees to be bound by and comply with applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, the Pennsylvania Rules of Professional Conduct and the Rules of this Commission. Mr. Schlesinger agrees to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during his appearance in this matter.

16. Mr. Schlesinger has consented to the appointment of Joseph Minott as his sponsor, who will serve as counsel of record for The Alliance For Solar Choice in this matter.

WHEREFORE, Joseph Minott, Movant and Counsel of Record for The Alliance for Solar Choice respectfully moves for the admission of David Wooley and Jacob J. Schlesinger to appear in this matter *pro hac vice* for The Alliance for Solar Choice for all permissible purposes in relation to these proceedings.

Date: May 7, 2015



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joe_minott@cleanair.org
Pa Bar Registration No. 36463

VERIFICATION

I, Joseph Minott, on behalf of The Alliance for Solar Choice, hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to penalties of 10 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 6, 2015



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al.	:	
	:	
v.	:	R-2015-2468981
	:	C-2015-2475585
PECO Energy Company	:	C-2014-2477974

NOTICE OF APPEARANCE

Please enter the appearance of Joseph Otis Minott, David R. Wooley and Jacob Schlesinger as counsel for The Alliance for Solar Choice (TASC) in the above entitled proceeding. They are authorized to accept service for TASC in this matter. On the basis of this Notice, they request a copy of each document issued hereafter by the Commission or the parties in this proceeding.

Respectfully submitted,



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David R. Wooley

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May 7, 2015

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v.	:	R-2015-2468981
	:	C-2015-2475585
PECO Energy Company	:	C-2014-2477974

PETITION TO INTERVENE OF THE ALLIANCE FOR SOLAR CHOICE

The Alliance for Solar Choice (TASC), through the undersigned local counsel hereby petitions the Pennsylvania Public Utility Commission (“PUC” “Commission”) to intervene in the above-captioned proceeding pursuant to the Rules of Practice and Procedure of the Pennsylvania PUC, 52 Pa. Code §§ 5.61-5.76, and in support, states as follows:

1. The Petitioner is an organization founded by the largest solar rooftop companies in the nation. TASC members provide services to the vast majority of the rooftop solar market. Its members include: Demeter Power, SolarCity, Solar Universe, Sungevity, Sunrun, and Verengo. They are responsible for many thousands of solar installations serving businesses, residents, schools, churches, and government facilities in Pennsylvania. TASC’s member companies have brought hundreds of jobs and many tens of millions of investment dollars to Pennsylvania’s cities and towns.

2. Petitioners are represented by:

David R. Wooley, Esq.
Of Counsel
Keyes, Fox & Weidman LLP
436 14th Street, Suite 1305
Oakland, CA 94612
Tel: (510) 314-8207
E-Mail: dwooley@kfwlaw.com

David Wooley is a member of the Pennsylvania Bar, (Attorney ID Number 22378) on inactive status, is a member in good standing of the New York and New Jersey bars, and has, through local counsel, filed a motion for leave to appear *pro hac vice* in this proceeding.

Jacob J. Schlesinger, Esq.
Associate
Keyes, Fox & Wiedman LLP
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16 Market Square, Suite 400
Denver, CO 80202
Tel: (970) 531-2525|
Email: jschlesinger@kfwlaw.com

Jacob Schlesinger is a member in good standing of the Bar of the State of Colorado and has, through local counsel filed a motion for leave to appear *pro hac vice* in this proceeding.

Joseph Otis Minott, Esq.
Local Counsel & Counsel of Record for TASC
135 South 19th Street, Suite 300
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joe_minott@cleanair.org
215-567-4004 Ext. 116

Joseph Minott is a member in good standing of the Bar of the Commonwealth of Pennsylvania (Attorney ID Number 36463).

3. On March 27, 2015, PECO Electric Utilities submitted a general base rate filing for electric operations, seeking a rate increase in the amount of \$190 million. Included in the rate filing are proposals to change elements of PECO's tariff design to increase distribution fixed charges and demand charges for residential, general service, primary distribution service and transmission service customers. More specifically it proposes to increase the residential fixed charge from \$7.13/month to

\$12.02 per month. It also requests increase in the monthly fixed charge for "former off-peak" meters from \$1.75/month to \$1.95/month. For General Service, Primary Distribution Service and transmission service customers it proposes to eliminate volumetric charges and to recover all distribution revenues through an increased demand charge. For General Service Customers it also proposes increases in general service fixed charges. These changes would harm the payback levels and financial returns for on-site generation (solar and other), storage and energy efficiency investments and may run counter to a wide range of clean energy policies of this Commission and of the Commonwealth of Pennsylvania.

4. PECO also proposes to establish a Distribution System Improvement Charge (DSIC) to support \$274.3 million in distribution service investments (from 2016-2020).

5. TASC is an industry association of businesses whose members provide a variety of services to residential and commercial electric customers in Pennsylvania, including behind-the-meter rooftop photovoltaic systems and power storage systems. TASC's office is located at 595 Market Street, 29th Floor, San Francisco, California 94105.

6. TASC and its members have a direct, immediate, substantial and distinct interest in the PECO general base rate filing for electric operations. PECO has proposed to increase fixed charges for residential and general service customers, which are the principal customer base for TASC members' solar energy and storage services. Increases in fixed charges reduce the economic benefit of investment in customer-sited solar generation and battery storage, and will tend to reduce the market for such systems.

These proposals could substantially devalue substantial investments already made by self-generating customers. TASC has participated in numerous public utility commission proceedings on the subject of increased fixed charges in other states, including proceedings in Arizona, California, Washington, Hawaii, Wisconsin, Nevada, New Mexico, Utah and Virginia.

7. TASC has preliminarily reviewed the PECO rate filing and intends to examine in this proceeding whether the request to increase fixed charges to residential and commercial customers will result in unjust and unreasonable rates for residential and commercial customers. TASC plans to challenge aspects of the cost basis for the increased fixed charges and its impact on on-site renewable energy development and associated storage technologies.

8. Solar PV, storage, energy efficiency and other forms of distributed energy resources (DER) provide a wide range of benefits both to individual customers and to the system as a whole. Increases in fixed costs will tend to suppress investment in these technologies leading in the long term to higher costs for all customers. This impact could run counter to a wide range of clean energy policies of this Commission and of the Commonwealth of Pennsylvania.

9. Furthermore, TASC has a general interest in this rate proceeding because the combination of PECO's retail rate schedule, its fixed and demand charges determine both the value of the kWh that a residential or commercial solar customer avoids purchasing the value of the kWh bill credit that the same customer receives for any excess generation and the overall monthly costs of electric service. Thus, changes to the volumetric and fixed components could impact the cost savings that can be achieved through onsite

generation and storage. This could substantially impact the market for TASC's members and could devalue substantial investments already made by self-generating customers.

10. TASC also plans to oppose PECO's proposal to impose a new standby charge ("capacity reservation rider") for customers with on-site renewable energy generation, who have "demands between 100 kW and 10,000 kW." Testimony Scott Neumann page

11. This new charge will penalize customers who invest in renewable on-site generation regardless of the system benefits provided by these systems. The effect will be to discourage customer investment in behind-the-meter renewable generation for commercial, agricultural properties, resulting in higher system costs and higher costs to individual customers who have or plan to invest in on-site renewable generation. This proposal also may run counter to a wide range of clean energy policies of this Commission and of the Commonwealth of Pennsylvania.

11. The cost driver for PECO's rate request is proposed substantial investment in distribution infrastructure. TASC plans to examine whether the revenue requirement for distribution infrastructure is reasonable and prudent. It believes that distribution expenditures will in the long run neither improve reliability nor be affordable unless they are invested in a manner that accommodates increased levels of distributed renewable generation and other distributed energy resources. Increased fixed costs and traditional patterns of distribution system operation and investment often have the effect of suppressing customer investment in clean distributed energy resources and driving up long run costs. Customers considering on-site renewable energy projects should not be faced with increasing fixed charges, "closed circuits," and other technical interconnection barriers that will inhibit increased development of on-site renewable projects on the


PECO distribution system. It is not prudent and is counter-productive to the Commonwealth's energy policies to finance distribution system investment with charges that tend to suppress customer investment in clean distributed energy resources.

WHEREFORE, The Alliance For Solar Choice respectfully request that the Commission enter an order granting it full status as an intervener in this proceeding with active party status.

Respectfully submitted,



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May 7, 2015

VERIFICATION

I, Joseph Minott, on behalf of The Alliance for Solar Choice, hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to penalties of 10 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 6, 2015



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VERIFICATION

I, Chris Ercoli, on behalf of The Alliance for Solar Choice, hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to penalties of 10 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 6, 2015



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cercoli@solarcity.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al.	:	
	:	
v.	:	R-2015-2468981
	:	C-2015-2475585
PECO Energy Company	:	C-2014-2477974

**PREHEARING MEMORANDUM OF
THE ALLIANCE FOR SOLAR CHOICE**

The Alliance for Solar Choice (TASC), through its undersigned local counsel, in response to the Prehearing Conference Order (Prehearing Order) issued on April 28, 2015 in Docket Numbers R-2015-2468981, C-2015-2475585, and C-2014-2477974, states as follows:

I. Background

On May 7, 2015 the Alliance for Solar Choice (TASC) filed a motion to intervene in this proceeding. This Prehearing Memorandum is being filed simultaneously to respond to the Prehearing Order, and in support of its Motion to Intervene.

II. Issues and Sub-Issues TASC Intends to Address

- Increase in Fix Charges: TASC has preliminarily reviewed the PECO rate filing and intends to examine in this proceeding whether the request to increase fixed charges to residential and commercial customers will result in just and reasonable rates for residential and commercial customers.
 - TASC’s witness will address the PECO cost of service study with respect to the cost basis of the fixed charge and its impact on on-site renewable energy development and associated storage technologies. We plan to review the

classification of costs in the cost-of-service study with respect to whether it reasonably assigns cost to the energy, demand and customer elements of the cost study.

- PECO is proposing to increase fixed customer charges for residential, commercial and industrial customers. TASC plans to investigate the: 1) the basis of these proposals; 2) the impact on the market for on-site renewable energy development and associated storage technologies; 3) the reasonableness and cost basis of these proposals (coincident or non-coincident demand); 4) whether any of the utility spending is energy related; and, 5) the basis for applicable demand ratchets. Additionally, TASC will evaluate the contribution of solar energy to meeting system peak will be evaluated to assure that these benefits are reflected in the PECO tariff design.
- In order to demonstrate the benefits that will be lost if customer sited solar energy is thwarted and to explain the impact of the PECO tariff proposals on PECO customers, the following net benefits will be analyzed and quantified, including but not limited to:
 - Peak value of solar energy (and its impact of non coincident and coincident peak allocators used in the cost of service model);
 - Merit order effect of solar energy in reducing energy costs to all customers;
 - Environmental benefits;
 - The regional economic benefits of solar energy development.

- Distribution System Costs: PECO’s primary rationale for the rate increase is to enhance performance and reliability of its distribution system. PECO is planning to invest \$274.3 million over the next five years in distribution system infrastructure improvements. TASC is concerned that this tremendous investment may not be proactively and transparently planned and developed in a way that can encourage and optimize the potential benefits of distributed energy resources (DERs) such as solar, storage, demand response and energy efficiency. TASC believes that PECO’s proposed rate designs could, by suppressing customer investment in distributed energy resources (DER), and lead to higher distribution costs and less reliability. Some states, including New York, are moving to adopt policies to increase investment in DERs and proactively identify opportunities for DERs to avoid or defer large conventional ratepayer funded investments. The fixed charge rate increase proposed by PECO moves in the opposite direction and could result in both increased and unjustified distribution costs and less reliability compared to a future in which DER resources are expanded. PECO should instead take actions that allow for the fuller development of on-site solar energy and other DER resources in the PECO system. PECO’s substantial investment of customer funds should be undertaken in a manner that facilitates growth in renewable energy systems and battery storage systems. TASC plans to contest the revenue requirement for the distribution system costs supporting the proposed increase in rates.
- Standby Charges for Customer-sited Generation: TASC also plans to investigate the validity of PECO’s proposal to impose a standby charge (“capacity reservation charge”) for customers with on-site renewable energy generation who have “demands between 100 kW and 10,000 kW.” Testimony Scott Neumann page 11. This new “Capacity

Reservation Rider” (CRR) will penalize customers who invest in renewable on-site generation regardless of the system benefits they provide. The effect will be to discourage customer investment in behind-the-meter renewable generation for commercial and agricultural customers, resulting in higher system costs and higher costs to those who have, or plan to invest in on-site renewable generation.

- Other Issues: TASC is still reviewing the testimony and revised tariff sheets proposed in this case and may identify additional issues of concern that we may address in discovery and in testimony.

III. Witnesses

Steve Gabel
Gabel Associates
417 Denison Street
Highland Park, NJ 08904
Phone: 732.296.0770
Fax: 732.296.0799

Mr. Gabel’s testimony will address the issues described above.

IV. Service of Documents

TASC requests that all parties serve copies of discovery requests and responses to discovery requests electronically on counsel listed below.

V. Procedural Schedule

TASC is prepared to comply with any procedural schedule agreed to by the Company and other parties.

VI. Settlement

TASC is open and available for settlement discussions with other parties in order to resolve or narrow the issues in this proceeding.

Respectfully submitted,



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May 7, 2015

VERIFICATION

I, Joseph Minott, on behalf of The Alliance for Solar Choice, hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to penalties of 10 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 6, 2015



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VERIFICATION

I, Chris Ercoli, on behalf of The Alliance for Solar Choice, hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to penalties of 10 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 6, 2015



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CERTIFICATE OF SERVICE

RE: Pennsylvania Public Utility Commission v. PECO Energy Company
Docket R-2015-2468981, C-2015-2475585, C-2014-2477974

I hereby certify that I have this day served a true copy of the foregoing document upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 7th day of May 2015.

SERVICE BY ELECTRONIC MAIL & FIRST CLASS U.S. MAIL, POSTAGE PREPAID

Hon. Angela T. Jones
Administrative Law Judge
PA Public Utilities Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107

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