

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2015-2468981
	:	
PECO Energy Company - Electric Division	:	

**Prehearing Memorandum**

On April 28, 2015, a Prehearing Conference Order was issued by the Honorable Angela T. Jones, Administrative Law Judge. The Order set forth specifications to direct the course of litigation and ordered parties to provide information about certain aspects of the proceedings to be resolved at the Prehearing Conference, scheduled for May 11, 2015. In response, Clean Air Council (“CAC”), hereby files this Prehearing Conference Memorandum.

**I. Background**

On March 27, 2015, PECO Energy Company (“PECO”) submitted a rate filing, Tariff–Electric PA P.U.C. No. 5 (“Tarriff 5”), in which PECO proposes to increase its retail distribution rates by approximately \$190.1 million. This would result in an average increase of approximately 15.6% in distribution rates. For residential customers, PECO proposes to increase the customer charges for both Rate R and RH by 68.3%.

On April 23, 2015 the Commission entered an order, which instigated an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained in Tarriff 5. Clean Air Council filed its Petition to Intervene on May 1, 2015.

**II. Issues to be Presented**

Based upon its initial review of PECO’s proposal CAC has identified the following issues:

- a. Financial impact on low- and moderate-income CAC members (all are PECO rate payers);
- b. Impact on CAC members (all are PECO rate payers) who have considered, installed, or will plan to install renewable energy sources, including, but not limited to photovoltaic panels (solar);
- c. Impact on CAC members (all are PECO rate payers) who have considered, installed, or will plan to install energy efficiency products or take any action to reduce energy consumption through practicing energy efficiency.

Clean Air Council reserves the right to raise other issues as those may arise.

### **III. Witnesses**

Clean Air Council has not identified a witness that it may call, however, CAC reserves the right to call a witness, or witnesses.

### **IV. Proposed Schedule**

Clean Air Council will work with all parties to establish a reasonable schedule.

### **V. Settlement**

Clean Air Council will engage in settlement discussions with any and all parties in an attempt to resolve or narrow the issues in this proceeding.

### **VI. Public Input Hearings**

Due to the potential impact on all PECO rate payers, including CAC members, CAC suggests that at least five (5) public hearings be held in order to allow the maximum input from PECO rate payers. PECO's proposed rate increase has the potential to deeply impact low- and moderate-income members and those who intend to, or have taken steps to implement energy efficiency measures and/or have considered or installed renewable energy sources. The public's input in this proposal is extremely critical and should be considered by the Commission.

### **VII. Service on Clean Air Council**

Electronic service only of all documents should be served on CAC as follows:

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Logan Welde, Esq.

E-Mail: lwelde@cleanair.org  
Telephone: 215-567-4004 - 126

WHEREFORE, Clean Air Council respectfully submits this Prehearing Conference  
Memorandum.

Respectfully submitted,



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May 7, 2015

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Clean Air Council's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

### Via Email and/or First Class Mail

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