

CITIZEN POWER

Public Policy Research Education and Advocacy

January 5, 2016

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
PO Box 3265
Harrisburg, PA 17105-3265

Re: Petition of Duquesne Light Company for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan; Docket M-2015-2515375

Dear Secretary Chiavetta:

Enclosed for filing with the Commission please find the Prehearing Memorandum of Citizen Power in the above-referenced proceeding.

Copies of this Petition have been served in accordance with the attached Certificate of Service.

Sincerely,



Theodore Robinson
Counsel for Citizen Power

Enclosure

cc: per Certificate of Service
Honorable Katrina L. Dunderdale

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for :
Approval of its Act 129 Phase III Energy : Docket No. M-2015-2515375
Efficiency and Conservation Plan :

PREHEARING MEMORANDUM OF CITIZEN POWER, INC.

Pursuant to the Public Utility Code, 52 Pa. Code § 5.222(d)(1), Citizen Power, Inc. (“Citizen Power”) provides the following information:

I. Service List: Citizen Power respectfully requests that its entry on the service list should be for its counsel, as follows:

Theodore Robinson
Staff Attorney
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217

Counsel consents to the service of documents by electronic mail to robinson@citizenpower.com, as provided in 52 Pa. Code § 1.54(b)(3).

II. Settlement: Citizen Power recognizes the potential savings for the Court and the Parties that can be achieved through settlement. Citizen Power is amenable to settlement discussions and the possibility of reaching a settlement in this matter.


III. Schedule and Discovery Rules: Citizen Power has reviewed the proposed procedural schedule and is prepared to collaborate with Judge Dunderdale and all other parties at

the Prehearing Conference to develop a reasonable schedule and any necessary modifications to the Commission's discovery rules, especially given the short timeframe allowed for this proceeding.

IV. Witnesses: At this time, Citizen Power is still investigating the issues and has not decided whether they will offer testimony in this matter. If it is determined that Citizen Power will be calling a witness, Judge Dunderdale and other parties will be notified as soon as the witness is identified.

V. Issues: Citizen Power is in the process of reviewing the filing and testimony submitted by the Duquesne Light Company. Citizen Power is specifically focused upon the cost effectiveness of the proposed programs in both the residential and governmental/educational/non-profit sectors as well as the design of the cost-recovery mechanisms. At this time, Citizen Power continues to evaluate its position on the filing and will refine its position based upon further study of the plan, review of discovery, and additional input from other parties. Petitioner reserves the right to raise other issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.

Respectfully Submitted,

By: 
Theodore S. Robinson (PA Bar # 203852)
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217
(412) 421-7029 (phone)

Dated January 5, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for :
Approval of its Act 129 Phase III Energy : Docket No. M-2015-2515375
Efficiency and Conservation Plan :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Prehearing Memorandum of Citizen Power, Inc. upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

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Dated this 5th day of January, 2016

By:



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