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April 20, 2016

Via Electronic Filing

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

Re: Petition of PECO Energy Company for Approval of Its Default
Service Program for the Period June 1, 2017 through May 31, 2019;
Docket No. P-2016-2534980

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Noble Americas Energy Solutions LLC is its Prehearing Memorandum in the above-referenced matter. Copies of the Prehearing Memorandum are being served upon the persons and in the manner set forth in the certificate of service attached to it.

Should you have any questions or require additional information, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Charles E. Thomas, III

Enclosure

cc: Certificate of Service (w/encl.)
Becky Merola (w/encl.)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company for :
Approval of Its Default Service Program for : Docket No. P-2016-2534980
the Period June 1, 2017 through May 31, 2019 :

**PREHEARING MEMORANDUM
OF NOBLE AMERICAS ENERGY SOLUTIONS LLC**

AND NOW, comes Noble Americas Energy Solutions LLC (“Noble”), by its attorney, and submits this Prehearing Memorandum in accordance with the Prehearing Order of Administrative Law Judge Cynthia Williams Fordham, dated April 12, 2016, and in connection with the initial Prehearing Conference scheduled to be held in the above-captioned matter on April 22, 2016.

I. Introduction

On March 17, 2016, PECO Energy Company (“PECO”) filed a petition seeking Commission approval of its fourth Default Service Program (“DSP IV”) to establish terms and conditions under which PECO will acquire and supply default service for a two-year period, from June 1, 2017 through May 31, 2019.

Noble timely filed a Petition to Intervene in this proceeding on April 19, 2016. Noble incorporates by reference the statements and information provided in its Petition to Intervene and respectfully requests that Judge Fordham grant its intervention.

II. Counsel for Noble; Service List

The name, business addresses, telephone and fax numbers, and email address of counsel for Noble are:

Charles E. Thomas III, Esq.
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Noble designates the above counsel for purposes of inclusion on the official service list. Noble also requests that, in addition to the above counsel, Becky Merola, Government Affairs East for Noble (bmerola@noblesolutions.com), be included on the email distribution list established for this proceeding.

III. Proposed Plan and Schedule for Discovery

Noble will work with Judge Fordham and the other parties at the Prehearing Conference to develop a proposed plan and schedule of discovery, as well as any reasonable and appropriate modifications to the Commission's Rules of Practice and Procedure for the conduct of discovery as are necessary.

IV. Settlement

Noble will actively participate in settlement discussions as they may occur.

V. Issues

Noble is in the process of identifying the issues it may pursue in this proceeding. Upon completing its review of PECO's filing and direct testimony, Noble may support, oppose, or propose modifications to PECO's proposed DSP IV. Noble reserves the right to present its position in accordance with the litigation schedule which will be finalized at the Prehearing Conference.

VI. Amount of Hearing Time Needed

Noble has not yet identified how many days (or parts of days) of hearing will be needed for this proceeding because it is still reviewing PECO's petition and direct testimony and has not yet determined its position on the many matters presented therein. Noble agrees, however, to work with the parties at the Prehearing Conference to determine the appropriate amount of hearing time needed.

VII. Witnesses

Noble is in the process of identifying any potential witnesses it might call and the intended subject matter. Noble agrees to notify Judge Fordham and the parties whether it will be submitting direct testimony in this proceeding and reserves the right to submit rebuttal and surrebuttal testimony as it deems appropriate. Noble will comply with all deadlines established in the proceeding for the service of testimony.

VIII. Proposed Litigation Schedule

Noble will cooperate with Judge Fordham and the other parties to finalize a schedule for the submission of testimony, hearings, and briefs at the Prehearing Conference. Noble has no objection, however, to the proposed litigation schedule presented on page 17 of PECO's DSP IV petition.

IX. Protective Order

Noble has no objection to the proposed protective order to be used for this proceeding which was previously circulated to the parties by PECO.

Respectfully submitted,



Charles E. Thomas, III, Esq. (PA ID # 201014)

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Counsel for Noble Americas Energy Solutions LLC

DATED: April 20, 2016

CERTIFICATE OF SERVICE

I hereby certify that I have this 20th day of April, 2016, served a true and correct copy of the foregoing Prehearing Memorandum of Noble Americas Energy Solutions LLC, upon the upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54:

VIA EMAIL AND FIRST CLASS MAIL

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