



COMMONWEALTH OF PENNSYLVANIA

June 21, 2016

E-FILED

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

**Re: Petition of PECO Energy Company For: (1) Approval of its Microgrid Integrated Technology Pilot Plan; and (2) Issuance of A Declaratory Order Regarding the Recovery of Microgrid Costs
Docket No. P-2016-2546452**

**Application For Construction of Microgrid Distributed Energy Resources Fueled By Natural Gas
Docket No. A-2016-2546450**

Dear Secretary Chiavetta:

I am delivering for filing today the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Rose Triscari".

Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921

Enclosures

cc: The Honorable Eranda Vero
The Honorable Cynthia W. Fordham
Mr. Brian Kalcic
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY :
FOR: (1) APPROVAL OF ITS MICROGRID :
INTEGRATED TECHNOLOGY PILOT PLAN : Docket No. P-2016-2546452
AND (2) ISSUANCE OF A DECLARATORY :
ORDER REGARDING THE RECOVERY OF :
MICROGRID COSTS :**

**APPLICATION FOR CONSTRUCTION OF :
MICROGRID DISTRIBUTED ENERGY : Docket No. A-2016-2546450
RESOURCES FUELED BY NATURAL GAS :**

**PREHEARING MEMORANDUM
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party in the above-captioned proceedings. Representing the OSBA is Deputy Small Business Advocate Elizabeth Rose Triscari. Please address all correspondence in this matter as follows:

Elizabeth Rose Triscari, Esquire
Deputy Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
etriscari@pa.gov

II. PROCEDURAL BACKGROUND

On May 18, 2016, PECO Energy Company (“PECO” or the “Company”) filed a Petition for: (1) Approval of its Microgrid Integrated Technology Pilot Plan and (2) Issuance of a Declaratory Order Regarding the Recovery of Microgrid Costs (“Petition”) and Application for Construction of Microgrid Distributed Energy Resources Fueled by Natural Gas (“Application”).

Notice of the Petition and Application were published in the Pennsylvania Bulletin on June 4, indicating that formal protests and petitions to intervene must be filed by June 20, 2016.

The OSBA filed an Answer, Notice of Intervention, Public Statement, and Notice of Appearance on June 7, 2016.

On June 14, 2016, the Commission’s Bureau of Investigation and Enforcement (“I&E”) filed a Notice of Appearance.

Administrative Law Judge (“ALJ”) Cynthia Williams Fordham and ALJ Eranda Vero have been assigned to this proceeding and issued a Prehearing Conference Order on June 10, 2016, informing the parties that a telephonic Prehearing Conference on this case will be held on June 22, 2016. The OSBA submits this prehearing memorandum in accordance with that Order.

III. IDENTIFICATION OF WITNESSES

Assisting in the development and presentation of the OSBA’s case in the above-captioned proceeding will be:

Mr. Brian Kalcic
Excel Consulting
Suite 720
225 S. Meramec Ave.
St. Louis, MO 63105
(314) 725-2511
excel.consulting@sbcglobal.net

The OSBA requests that all parties provide courtesy copies of all documents, including discovery, testimony and briefs, to Mr. Kalcic, simultaneously with service upon the OSBA.

IV. IDENTIFICATION OF ISSUES

The OSBA is participating in this case to ensure that the interests of the Company's small business customers are adequately represented and protected.

At this time, after an initial review of the materials submitted by the Company, the OSBA is concentrating on the following issues:

1. Whether the Company's proposal to construct and operate a microgrid represents the least cost approach to improving overall system reliability in the proposed microgrid deployment area; and
2. Whether the Company's proposal to recover a portion of its projected Microgrid Pilot costs through its DSIC is reasonable and appropriate.

The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

V. DISCOVERY

The OSBA will cooperate with the ALJs and other parties to arrive at any mutually agreeable discovery modifications.

VI. SERVICE OF DOCUMENTS

The OSBA agrees to accept electronic mail delivery of documents on the due date as satisfying the in-hand requirement, *provided that such documents are followed by hard copy delivery to OSBA by first class mail*. Service by electronic mail *only* is not acceptable. The

OSBA requests that such hard copies are also provided to its witness identified above.

In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. The OSBA also requests that all parties serve an electronic copy of all interrogatory responses upon the OSBA and the OSBA witness identified above.


VII. SETTLEMENT

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of the proceeding.

VIII. PROCEDURAL SCHEDULE

The OSBA will cooperate with the ALJs and other parties to arrive at a mutually agreeable procedural schedule.

Respectfully submitted,


Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID #306921

For:
John R. Evans
Small Business Advocate

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Dated: June 21, 2016

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (unless other noted below) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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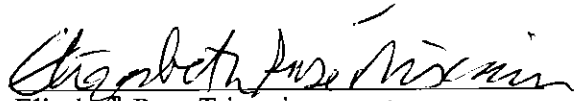
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DATE: June 21, 2016


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