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March 27, 2017

**VIA ELECTRONIC FILING**

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

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works, Docket No. R-2017-2586783; **PREHEARING CONFERENCE MEMORANDUM OF THE RETAIL ENERGY SUPPLY ASSOCIATION**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Prehearing Conference Memorandum of The Retail Energy Supply Association in the above-captioned proceeding. Copies of this Memorandum have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart  
Counsel for  
*The Retail Energy Supply Association*

TSS/jld

Enclosure

cc: Deputy Chief Administrative Law Judge Christopher P. Pell  
Administrative Law Judge Marta Guhl  
Per Certificate of Service

## CERTIFICATE OF SERVICE

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

### VIA ELECTRONIC AND FIRST CLASS MAIL

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Todd S. Stewart

DATED: March 27, 2017

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2017-2586783
	:	
Philadelphia Gas Works	:	

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**PREHEARING CONFERENCE MEMORANDUM  
OF THE RETAIL ENERGY SUPPLY ASSOCIATION**

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NOW COMES The Retail Energy Supply Association, (“RESA”) by and through its counsel, Hawke McKeon & Sniscak, LLP, and hereby provides the Honorable Presiding Administrative Law Judges with its Prehearing Conference Memorandum as required by the Deputy Chief Administrative Law Judge Christopher P. Pell and Administrative Law Judge Marta Guhl’s (“ALJs”) Prehearing Conference Order dated March 17, 2017. RESA states as follows:

**I. ACCEPTANCE OF SERVICE**

1. Service of all documents in this proceeding shall be accepted on behalf of RESA by the following counsel:

Todd S. Stewart  
Attorney ID # 75556  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
Email: [tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
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## **II. DISCOVERY**

2. RESA expects to engage in the discovery process and as of the date of the Prehearing Conference will have served at least one set of interrogatories. RESA attempt to be as expeditious as possible in conducting discovery and will do so in conformance with the Commission's regulations in that regard, however, RESA does not believe that a formal plan of discovery is needed. RESA is aware that the Office of Consumer Advocate typically suggests modifications to the Commission's discovery regulations for cases such as this and it does not object to those additional requirements.

## **III. SETTLEMENT**

3. RESA commits to working with all parties in an effort to achieve a reasonable settlement of some or all of the issues in this matter.

## **IV. ISSUES**

4. The issues that RESA presently intends to address are: 1) PGW's proposed modifications to interruptible service and rates; 2) other operational issues; 3) the current POR discount and 4) alternative methods of recovering the costs of the POR program while continuing to recover the costs associated with billing system improvements, customer education and other competitive enhancements that presently are recovered through the POR discount. This is not an exhaustive list and RESA reserves the right to address additional issues as appropriate.

**V. WITNESSES**

5. RESA intends to present the testimony of two witnesses. Randy Mangioni will present testimony on operational issues and Anthony Cusati, III, will present testimony on POR related subjects.

**VI. HEARING TIME**

6. RESA would suggest that three days should be sufficient to allow for hearings where written testimony is presented for the record and parties are able to cross examine witnesses.

**VII. SCHEDULE**

7. RESA participated in a call at which time a schedule was agreed-to by all parties. RESA supports adoption of the following consensus schedule:

	<u>Proposed Date</u>
Public Input Hearings	May 9-11, 2017
Non-Company Direct	May 16, 2017
Rebuttal	June 9, 2017
Surrebuttal	June 22, 2017
Evidentiary Hearings/ Rejoinder	June 28-30, 2017
Close of Record	July 5, 2017
Main Briefs	July 21, 2017
Reply Briefs	August 4, 2017
Public Meeting	November 8, 2017

**VIII. PUBLIC INPUTS**

8. RESA does not object to public input hearings, but requests in advance to be excused from attendance at same.

**WHEREFORE**, RESA respectfully submits its Prehearing Conference Memorandum for Your Honors' consideration.

Respectively submitted,



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*Counsel for  
The Retail Energy Supply Association*

DATED: March 27, 2017