

**ECKERT  
SEAMANS**  
ATTORNEYS AT LAW

Eckert Seamans Cherin & Mellott, LLC  
213 Market Street  
8<sup>th</sup> Floor  
Harrisburg, PA 17101

TEL 717 237 6000  
FAX 717 237 6019  
www.eckertseamans.com

Deanne M. O'Dell  
717.255.3744  
dodell@eckertseamans.com

April 27, 2017

**Via Electronic Filing**

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

Re: Petition of PECO Energy Company for Approval of its Default Service Program  
(Customer Assistance Program Shopping Plan) (DSP II) – Docket No. P-2012-2283641

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

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Direct Energy Services LLC's ("Direct Energy")  
Prehearing Memorandum with regard to the above-referenced matter. Copies to be served in  
accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/lww  
Enclosure

cc: Hon. Angela Jones, w/enc.  
Certificate of Service w/enc.

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Direct Energy's Prehearing Memorandum upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

### Via Email and/or First Class Mail

Romulo L. Diaz, Jr., Esquire  
W. Craig Williams, Esquire  
Ward Smith, Esq.  
Exelon Business Services Company  
2301 Market Street, S23-1  
Philadelphia, PA 19101-8699  
[romulo.diaz@exeloncorp.com](mailto:romulo.diaz@exeloncorp.com)  
[craig.williams@exeloncorp.com](mailto:craig.williams@exeloncorp.com)  
[ward.smith@exeloncorp.com](mailto:ward.smith@exeloncorp.com)

Thomas P. Gadsden, Esquire  
Kenneth M. Kulak, Esquire  
Brooke E. McGlinn, Esquire  
Morgan, Lewis & Bockius  
1701 Market Street  
Philadelphia, PA 19103  
[tgadsden@morganlewis.com](mailto:tgadsden@morganlewis.com)  
[kkulak@morganlewis.com](mailto:kkulak@morganlewis.com)  
[bmclinn@morganlewis.com](mailto:bmclinn@morganlewis.com)

Aron J. Beatty, Esquire  
Christy Appleby, Esquire  
Candis Tunilo, Esquire  
Amy E. Hirakis, Esq.  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[abeatty@paoca.org](mailto:abeatty@paoca.org)  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[ctunilo@paoca.org](mailto:ctunilo@paoca.org)  
[ahirakis@paoca.org](mailto:ahirakis@paoca.org)

Michael A. Gruin, Esq.  
Stevens & Lee  
17 North Second St., 16<sup>th</sup> Fl.  
Harrisburg, PA 17101  
[mag@stevenslee.com](mailto:mag@stevenslee.com)

Elizabeth Rose Triscari, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 202,  
Harrisburg, PA 17101  
[etriscari@pa.gov](mailto:etriscari@pa.gov)

Carrie B. Wright, Esquire  
Phillip C. Kirchner, Esquire  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[carwright@pa.gov](mailto:carwright@pa.gov)  
[phikirchne@pa.gov](mailto:phikirchne@pa.gov)

Charis Mincavage, Esquire  
Adeolu A. Bakare, Esquire  
Alessandra L. Hylander, Esquire  
McNees, Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mwn.com](mailto:cmincavage@mwn.com)  
[abakare@mwn.com](mailto:abakare@mwn.com)  
[ahylander@mwn.com](mailto:ahylander@mwn.com)

Harry Geller, Esq.  
Patrick M. Cicero, Esq.  
Elizabeth R. Marx, Esq.  
Joline Price, Esq.  
Pennsylvania Utility Law Project  
118 Locust St.  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

Charles E. Thomas, III, Esq.  
Thomas, Niesen & Thomas, LLC  
212 Locust St., Suite 600  
Harrisburg, PA 17101  
[Cet3@tntlawfirm.com](mailto:Cet3@tntlawfirm.com)

Robert W. Ballenger, Esq.  
Josie B. Pickens, Esq.  
Community Legal Services, Inc.  
1424 Chestnut St.  
Philadelphia, PA 19102  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
[jpickens@clsphila.org](mailto:jpickens@clsphila.org)

David P. Zambito, Esq.  
Cozen O'Connor  
17 North Second St., Suite 1410  
Harrisburg, PA 17101  
[dzambito@cozen.com](mailto:dzambito@cozen.com)

Todd S. Stewart, Esquire  
Hawke, McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Stephen L. Huntoon, Esq.  
801 Pennsylvania Ave., NW, Suite 220  
Washington, DC 20004  
[huntoon@energy-counsel.com](mailto:huntoon@energy-counsel.com)

H. Gil Peach  
H. Gil Peach & Associates, LLC  
16232 NW Oak Hill Drive  
Beavertown, OR 97006-5242  
[hgilpeach@attglobal.net](mailto:hgilpeach@attglobal.net)

Jesse A. Dillon Esq.  
PPL EnergyPlus, LLC  
Two North Ninth St.  
Allentown, PA 18101  
[jadillon@pplweb.com](mailto:jadillon@pplweb.com)

Laurie L. Baughman, Esq.  
PA Coalition Against Domestic Violence  
3605 Vartan Way, Suite 101  
Harrisburg, PA 17110

Amy E. Hamilton, Esq.  
Exelon Generation Company  
300 Exelon Way  
Kennett Square, PA 19348  
[Amy.hamilton@exeloncorp.com](mailto:Amy.hamilton@exeloncorp.com)

Steven Larin, Director  
Nationalities Service Center  
1216 Arch St., 4<sup>th</sup> Fl.  
Philadelphia, PA 19107

Noel Trask  
Associate General Counsel  
Exelon Business Services  
300 Exelon Way  
Kennett Square, PA 19348

Becky Merola, Esq.  
Government Affairs East  
Noble Americas Energy Solutions LLC  
5325 Sheffield Ave.  
Powell, OH 43065  
[bmerola@noblesolutions.com](mailto:bmerola@noblesolutions.com)

Amy M. Klodowksi, Esq.  
FirstEnergy Solutions Corp.  
800 Cabin Hill Dr.  
Greensberg, PA 15602  
[aklodow@firstenergycorp.com](mailto:aklodow@firstenergycorp.com)

Divesh Gupta, Esq.  
Constellation Energy Group  
Candler Bldg., 5<sup>th</sup> Fl.  
111 Market Place, Suite 500  
Baltimore, MD 21202  
[Divesh.gupta@constellation.com](mailto:Divesh.gupta@constellation.com)

Maripat Pileggi, Esq.  
Community Legal Services Inc.  
1410 W. Erie Ave.  
Philadelphia, PA 19140

Will Gonzalez, Exec. Director  
149 W. Susquehanna Ave.  
Philadelphia, PA 19122

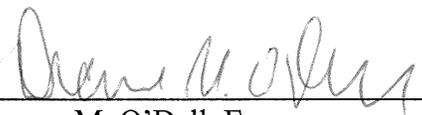
Telemac N. Chryssikos, Esq.  
101 Constitution Ave., NW, Room 319  
Washington, DC 20080

Natasha Kelemen, Exec. Director  
2100 Arch St., 7<sup>th</sup> Floor  
Philadelphia, PA 19104

Thomas McCann Mullooly, Esq.  
Foley Lardner LLP  
777 E. Wisconsin Ave.  
Milwaukee, WI 53213

Veronica Ludt  
Face to Face  
109 E. Price Street  
Philadelphia, PA 19144

Date: April 27, 2017

  
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Deanne M. O'Dell, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for	:	
Approval of its Default Service Program	:	
(Customer Assistance Program Shopping	:	Docket No. P-2012-2283641
Plan)(DSP II)	:	
	:	
	:	
Petition of PECO Energy Company for	:	
Approval of Its Default Service Program	:	Docket No. P-2016-2534980
for the Period From June 1, 2017 Through	:	
May 31, 2019	:	

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**PREHEARING MEMORANDUM  
OF DIRECT ENERGY SERVICES, LLC**

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Pursuant to 52 Pa. Code §§ 5.72-5.75 and the Prehearing Conference Order dated April 12, 2016, Direct Energy Services, LLC (“Direct Energy”) submits this Prehearing Memorandum.

**I. SERVICE OF DOCUMENTS**

Direct Energy requests that all documents be served on:

Deanne M. O’Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
P.O. Box 1248  
Harrisburg, PA 17101  
717.237.6000  
Fax 717.237.6019  
dodell@eckertseamans.com

Direct Energy also agrees to receive service of documents electronically in this proceeding. To the extent that materials are available electronically, it is requested that copies be served upon:

Daniel Clearfield – dclearfield@eckertseamans.com  
Deanne O’Dell – dodell@eckertseamans.com  
Sarah C. Stoner – sstoner@eckertseamans.com

**II. SETTLEMENT**

Direct Energy is willing to participate in settlement discussions with any party to narrow the issues in this matter.

**III. PROPOSED PLAN AND SCHEDULE OF DISCOVERY**

Direct Energy is amenable to working with the other parties in this matter to adopt a reasonable proposed plan and schedule of discovery. Direct Energy does not have any proposals regarding discovery modifications.

**IV. SCHEDULE FOR SUBMISSION OF TESTIMONY, HEARINGS AND BRIEFS**

Direct Energy will cooperate with the other parties and the Presiding Officer to facilitate a workable litigation schedule.

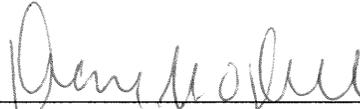
**V. WITNESSES**

At this time, Direct Energy is still evaluating whether or not to present testimony in this matter. Direct Energy reserves the right to present a witness as may be necessary depending on the course of the proceeding and will provide the Presiding Officer as well as the other parties in this matter reasonable notice if necessary. Direct Energy also reserves its right to add additional witnesses or change the identity of its witnesses at any time upon appropriate notice to the Presiding Officer and the parties.

**VI. PRESENTLY IDENTIFIED ISSUES**

The issue to be addressed in this proceeding is how to permit PECO's customer assistance program ("CAP") to shop for a competitive electric generation supplier. Direct Energy supports giving these customers this right as soon as practicable and will work with the parties as appropriate toward this goal.

Respectfully submitted,



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Deanne M. O'Dell, Esquire  
Attorney ID 81064  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
P.O. Box 1248  
Harrisburg, PA 17101  
717.237.6000  
Fax 717.237.6019  
dclearfield@eckertseamans.com  
dodell@eckertseamans.com  
sstoner@eckertseamans.com

Date: April 27, 2017

Attorneys for Direct Energy Services, LLC