BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission : 

v. : Docket No. R-2018-3000164 

PECO Energy Company : 

COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA’S 
PRE-HEARING CONFERENCE MEMORANDUM

I. HISTORY

The Community Action Association of Pennsylvania (CAAP) intervened in this matter by Petition to Intervene filed on April 23, 2018. CAAP is a statewide association representing Pennsylvania’s community action agencies that provide anti-poverty planning and community development activities for low-income communities and services to individuals and families. CAAP has intervened in prior matters before the Pennsylvania Public Utility Commission for the purpose of addressing a company’s universal service programs and the effects of any requested rate increases on low-income customers. CAAP intervened in this particular matter to examine the effects of the proposed rate increase and rate design on low-income customers and to address whether the Company’s universal service programs will be appropriately funded and available as a result of this request. CAAP reserves the right to address other issues raised by the Company’s request.

II. ISSUES TO BE PRESENTED BY CAAP

1. Whether the Company’s universal service programs are appropriately funded and available and whether those programs will remain appropriately funded and available if the request for a rate increase is granted.
2. The effect of any proposed rate increase and/or rate design on the residential customer class and particularly low-income, residential customers and their ability to conserve and lower their bills.

3. Such other additional issues as may arise during the discovery process.

III. WITNESSES

CEO will present the testimony of Susan A. Moore, Executive Director of CAAP, to address the issues above-described.

IV. PROPOSED SCHEDULE

CAAP will work with the other parties for an agreed upon schedule to be presented to the Administrative Law Judge.

V. SETTLEMENT

CAAP will be open to settlement discussions as this matter proceeds.

Respectfully submitted,

[Signature]

JOSEPH L. VULLO, ESQUIRE
I.D. No. 41279
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
Attorney for Community Action Association of Pennsylvania
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v.

Docket No. R-2018-3000164

PECO Energy Company

COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA'S
PETITION TO INTERVENE

The undersigned certified that he served a copy of the foregoing Community Action Association of Pennsylvania's Pre-Hearing Conference Memorandum upon the following participants this ______ day of May, 2018, via first-class mail:

Romulo L. Diaz, Jr., Esquire
Jack R. Garfinkle, Esquire
W. Craig Williams, Esquire
Michael S. Swerling, Esquire
PECO Energy Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101

Kenneth M. Kulak, Esquire
Anthony C. Decusatis, Esquire
Morgan, Lewis & Bockius, LLP
1701 Market Street
Philadelphia, PA 19103

Carrie B. Wright, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

Elizabeth Rose Triscari, Esquire
Office of Small Business Advocate
300 North Second Street
Suite 202
Harrisburg, PA 17101

Elizabeth R. Marx, Esquire
Patrick M. Cicero, Esquire
Kadeem G. Morris, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Christy Appleby, Esquire
Aron J. Beatty, Esquire
Hayley E. Dunn, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101

Scott J. Rubin, Esquire
333 Oak Lane
Bloomsburg, PA 17815

Charis Mincavage, Esquire
Adeolu Bakare, Esquire
Alessandra Hylander, Esquire
McNees, Wallace & Nurick, LLC
P.O. Box 1166
Harrisburg, PA 17108-1166

Roger E. Clark
905 Denston Drive
Ambler, PA 19002
David P. Zambito, Esquire
Jonathan P. Nase, Esquire
Cozen O’Connor
17 North Second Street
Suite 1410
Harrisburg, PA 17101

Roman Petyk, Esquire
Associate General Counsel
The University of Pennsylvania
Office of General Counsel
2929 Walnut Street
FMC Tower, Suite 400
Philadelphia, PA 19104-5099

Respectfully submitted,

JOSEPH L. VULLO, ESQUIRE
I.D. No. 41279
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@bvrlaw.com
Attorney for Community Action Association of Pennsylvania