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January 4, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

RE: Joint Petition for Consolidation of Proceedings and Approval of the Phase IV Energy Efficiency and Conservation Plans of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company; Docket Nos. M-2020-3020820, M-2020-3020821, M-2020-3020822, M-2020-3020823

Dear Secretary Chiavetta:

Attached please find for filing with the Pennsylvania Public Utility Commission the Prehearing Memorandum on behalf of the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII"), in the above-referenced proceeding.

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this document upon request.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Charis Mincavage

Counsel to the Met-Ed Industrial Users Group,
the Penelec Industrial Customer Alliance, and
the West Penn Power Industrial Intervenors

c: Deputy Chief Administrative Law Judge Mark A. Hoyer
Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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Charis Mincavage

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the Penelec Industrial Customer Alliance, and
the West Penn Power Industrial Intervenor

Dated this 4th day of January, 2021, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition for Consolidation of Proceedings :
and Approval of the Phase IV Energy Efficiency : Docket Nos. M-2020-3020820
and Conservation Plan of Metropolitan Edison : M-2020-3020821
Company, Pennsylvania Electric Company, : M-2020-3020822
Pennsylvania Power Company, and West Penn : M-2020-3020823
Power Company :

**PREHEARING MEMORANDUM OF
THE MET-ED INDUSTRIAL USERS GROUP,
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE, AND
THE WEST PENN POWER INDUSTRIAL INTERVENORS**

Pursuant to the December 30, 2020, Prehearing Conference Order issued by Deputy Chief Administrative Law Judge ("ALJ") Mark A. Hoyer, the Med-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, "Industrial Customer Groups") hereby submit this Prehearing Memorandum in the above-captioned proceeding.¹

I. HISTORY OF THE PROCEEDING

On November 30, 2020, the Companies petitioned the Commission for approval of their Phase IV Energy Efficiency & Conservation ("EE&C") Plans ("Phase IV Plans"). The Companies' Joint Petition for Consolidation and Approval of their Phase IV Plans ("Joint Petition") seeks approval of the Companies Phase IV Plans and, according to the Companies, includes a suite of programs designed to meet the additional consumption reduction targets and coincident peak demand reduction targets adopted by the Commission. *See* Joint Petition, p. 1.

¹Because the Industrial Customer Groups are filing their Joint Petition to Intervene simultaneously with this Prehearing Memorandum, the Industrial Customer Groups were not served with ALJ Hoyer's December 30, 2020, Prehearing Conference Order. As a result, the Industrial Customer Groups only became aware of the requirements of the Prehearing Conference Order today.

The Phase IV Plans follow Met-Ed's, Penelec's, Penn Power's, and West Penn Power's currently effective Phase III EE&C Plans, which were approved by the Commission on March 10, 2016, and will expire on May 31, 2021. Among other provisions in the Joint Petition, the Companies propose to include programs for Large Commercial and Industrial ("C&I") customers, the costs of which would be recovered through a non-bypassable Phase IV EE&C-C Rider.

Concurrent with the filing of this Prehearing Memorandum, the Industrial Customer Groups are filing a Joint Petition to Intervene in this proceeding. A description of the Industrial Customer Groups is set forth in Paragraph 1 of the Industrial Customer Groups' Joint Petition to Intervene.

A Prehearing Conference has been scheduled in these proceedings for January 5, 2021.

II. SERVICE LIST

For purposes of service in the above-captioned proceedings, please direct all communications to:

Susan E. Bruce (Pa. I.D. No. 80146)
Charis Mincavage (Pa. I.D. No. 82039)
Jo-Anne Thompson (Pa. I.D. No. 325956)
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III. ANTICIPATED ISSUES AND SUB-ISSUES

The Industrial Customer Groups are concerned with issues regarding the terms and conditions of their electricity service, including the PUC's final disposition of the Companies Phase IV Plans, which would directly affect the rates that the Companies impose on the

Industrial Customer Groups for electric service. The Industrial Customer Groups seek to ensure that the Companies implement their Phase IV EE&C Plans in a just and reasonable manner, consistent with Act 129, the PUC's Implementation Order, and all applicable statutes and regulations. The Industrial Customer Groups anticipate pursuing these issues during these proceedings and also reserve the right to raise further issues and to respond to all matters raised by other parties.

IV. PROPOSED WITNESSES

The Industrial Customer Groups are in the process of evaluating whether they will sponsor any testimony in these proceedings. In the event the Industrial Customer Groups decide to sponsor testimony, the Industrial Customer Groups will inform the ALJs and the other parties of any intended witnesses and topics of testimony. The Industrial Customer Groups also intend to participate in these proceedings through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions and reply exceptions, if necessary.

V. PROPOSED SCHEDULE AND DISCOVERY RULES

The Industrial Customer Groups will cooperate with the ALJs and the parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJs.

VI. POSSIBILITY OF SETTLEMENT

The Industrial Customer Groups are willing to participate in discussions with the other parties to amicably resolve the issues in these proceedings.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: January 4, 2021