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January 7, 2021

**VIA eFILING**

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

**Re: Petition of PECO Energy Company for Approval of Its Act 129 Phase IV Energy Efficiency and Conservation Plan, Docket No. M-2020-3020830**

*Prehearing Conference Memorandum of TURN*

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Prehearing Conference Memorandum of Tenant Union Representative Network (TURN) in the above-captioned proceeding.

Due to the ongoing COVID-19 pandemic, this Petition to Intervene is being served via email as indicated on the attached Certificate of Service

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

Sincerely,

Kintéshia S. Scott, Esquire  
*Counsel for TURN*

Enc.

Cc: Service list

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company :  
for Approval of Its Act 129 Phase IV : Docket No. M-2020-3020830  
Energy Efficiency and Conservation Plan :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the Prehearing Conference Memorandum of Tenant Union Representative Network and upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54.

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January 7, 2021

*Counsel for TURN*

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company :  
for Approval of Its Act 129 Phase IV : Docket No. M-2020-3020830  
Energy Efficiency and Conservation Plan :

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**PREHEARING CONFERENCE MEMORANDUM  
OF TENANT UNION REPRESENTATIVE NETWORK**

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January 7, 2021

*Counsel for TURN*

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company :  
for Approval of Its Act 129 Phase IV : Docket No. M-2020-3020830  
Energy Efficiency and Conservation Plan :

**Prehearing Conference Memorandum of Tenant Union Representative Network**

On December 30, 2020, Administrative Law Judge Mark A. Hoyer issued a Prehearing Conference Order setting a telephonic prehearing conference for Friday, January 8, 2021 at 10:00 a.m., and requiring parties to e-file and serve by email a Prehearing Conference Memorandum, prior to 2:00 p.m. on January 7, 2021. In response, the Tenant Union Representative Network (“TURN”), through its attorneys at Community Legal Services, Inc., hereby files this Prehearing Conference Memorandum.

**I. Background**

On June 18, 2020, after review and consideration of comments and reply comments of Companies and other interested parties, the Commission issued its Energy Efficiency and Conservation Program (EE&C) Phase IV Implementation Order (Implementation Order). The Implementation Order directed that Phase IV of the EE&C Program operate from June 1, 2021 through May 31, 2026, and prescribed further energy consumption and peak demand reduction targets. The Commission ordered that electric distribution companies (EDCs) file EE&C Plans for Phase IV by November 30, 2020. On November 30, 2020, PECO Energy Company (PECO or the Company) filed its Petition Approval of Its Act 129 Phase IV Energy Efficiency and Conservation Plan at the above-captioned docket.

On December 30, 2020, the Commission's Office of Administrative Law Judge (OALJ) issued a Telephonic Prehearing Conference Notice, scheduling a Call-In Telephonic Prehearing Conference before Administrative Law Judge (ALJ) Mark A. Hoyer for Friday, January 8, 2021. On January 6, 2021, the Office of Administrative Law Judge issued a Judge Addition Notice naming ALJ Emily Devoe as an additional judge in the proceeding.

**II. Discovery**

TURN will work with the parties to develop appropriate modifications to discovery rules that support the prompt and robust exchange of all relevant information.

**III. Settlement**

TURN is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourage the parties to engage in settlement early in the process.

**IV. Issues to be Presented**

TURN has reviewed PECO's filing and intends to examine whether PECO's proposed EE&C Program Phase IV Implementation plan will serve to adequately address the needs of low-income residential customers as it relates to the Company's deployment of energy efficiency and peak reduction demand measures to meet established targets in accordance with requirements under Act 129. TURN also intends to examine whether these EE&C Program measures are adequately funded and available to low-income Philadelphia tenants, including tenants who may reside in multi-family dwellings where PECO has proposed to offer energy efficiency and peak demand reduction measures. TURN reserves the right to examine any other issues that arise in the course of this proceeding.

**V. Witnesses and Testimony**

TURN reserves the right to call witnesses as may be warranted upon proper notice to Your Honors and the parties.

**VI. Proposed Schedule**

TURN is prepared to work with Your Honors and the parties to establish a reasonable litigation schedule. The schedule should provide adequate time and opportunity for a thorough analysis of PECO's filing and any discovery requests.

**VII. Evidentiary Hearings**

In light of the ongoing COVID-19 pandemic, TURN submits that a telephonic or remote process should be established for any evidentiary hearings that are scheduled in this proceeding

**VIII. Service on TURN**

TURN is represented by the attorneys at Community Legal Services, Inc. Electronic service of all documents should be served on TURN as follows:

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**IX. Prehearing Conference**

Kintéshia S. Scott, Esquire will serve as primary speaker as Counsel for TURN for the purposes of the prehearing conference.

WHEREFORE, TURN respectfully submits this Prehearing Conference Memorandum.

Kinteshia Scott

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January 7, 2021

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