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June 8, 2022

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

VIA ELECTRONIC FILING

RE: Pennsylvania Public Utility Commission v. PECO Energy Company; Docket No. R-2022-3032250

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Prehearing Memorandum of the Philadelphia Area Industrial Energy Users Group ("PAIEUG"), in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this filing. If you have any questions regarding the documents, please feel free to contact the undersigned. Thank you.

Sincerely,

A handwritten signature in cursive script that reads 'Charis Mincavage'.

Charis Mincavage
MCNEES WALLACE & NURICK LLC

Counsel to the Philadelphia Area Industrial Energy Users Group

c: Administrative Law Judge Darlene D. Heep (via e-mail)
Shalea Delvillar, Legal Assistant (via email)
Certificate of Service

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 Section 1.54 (relating to service by a participant).

VIA E-MAIL

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Charis Mincavage

Counsel to the Philadelphia Area Industrial
Energy Users Group

Dated this 8th day of June, 2022, in Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No. R-2022-3032250
	:	
	:	
	:	
Office of Consumer Advocate	:	Docket No. C-2022-3032649
	:	
v.	:	
	:	
PECO Energy Company – Gas Division	:	
1307(f) Proceeding	:	

**PREHEARING MEMORANDUM
OF THE PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP**

As requested by Administrative Law Judge ("ALJ") Darlene D. Heep in the Prehearing Conference Order dated May 31, 2022, the Philadelphia Area Industrial Energy Users Group ("PAIEUG") hereby submits this Prehearing Memorandum.

I. HISTORY OF THE PROCEEDING

On April 29, 2022, PECO Energy Company ("PECO" or "Company") submitted its preliminary Purchased Gas Cost ("PGC") filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission"), pursuant to Section 1307(f) of the Public Utility Code, 66 Pa. C.S. 1307(f). On May 18, 2022, PAIEUG filed with the Commission a Petition to Intervene in this proceeding. A description of PAIEUG is set forth in Paragraph 4 of PAIEUG's Petition to Intervene. PAIEUG's Petition to Intervene is outstanding and awaits disposition by the ALJ. On May 31, 2022, PECO submitted supporting testimony and associated exhibits setting forth the Company's proposed purchased gas cost rates for service rendered on and after December 1, 2022. The Prehearing Conference for this proceeding is scheduled for June 9, 2022.

II. IDENTIFICATION OF LEAD ATTORNEY

For purposes of the Prehearing Conference, Charis Mincavage will speak as the lead attorney on behalf of PAIEUG.

III. ANTICIPATED ISSUES AND SUB-ISSUES

Because changes to the Company's PGC proposal may affect the terms and conditions under which PAIEUG members receive service, in particular, changes to the PECO's delivery service, retainage charges, pipeline capacity cost assignment, penalty charges, and daily and monthly imbalance penalties, PAIEUG seeks to be involved in PECO's PGC proceeding. PAIEUG anticipates pursuing any issues associated with the Company's PGC proposal affecting the aforementioned issues, as necessary, and reserves the right to raise further issues and to respond to all matters raised by other parties.

IV. PROPOSED WITNESS

PAIEUG is in the process of evaluating whether it will sponsor testimony in this proceeding. In the event that PAIEUG decides to sponsor testimony, it will immediately inform the parties and the ALJ of any intended witnesses and topics of testimony. PAIEUG also intends to participate in this proceeding 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


PAIEUG will cooperate with the ALJ and the parties at the Prehearing Conference to finalize an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJ. Additionally, PAIEUG will defer to the other parties at the Prehearing Conference as to the need for public input hearings.

VI. POSSIBILITY OF SETTLEMENT

PAIEUG is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully Submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: June 8, 2022