



COMMONWEALTH OF PENNSYLVANIA

June 20, 2025

**E-FILED**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v. PECO Energy Company – 1307(f) /  
Docket No. R-2025-3054868**

Dear Secretary Homsher:

Enclosed for filing please find the Prehearing Memorandum, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

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

Sincerely,

*/s/ Steven C. Gray*

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: Mark Ewen  
Parties of Record



## **II. FILING BACKGROUND**

On May 30, 2025, pursuant to Section 1307(f) of the Public Utility Code, the PECO Energy Company (“PECO” or the “Company”) submitted the Company’s annual Purchased Gas Cost (“PGC”) Rate filing.

The Office of Small Business Advocate (“OSBA”) filed a Complaint on June 9, 2025.

## **III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES**

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mr. Mark Ewen  
Industrial Economics Incorporated  
2067 Massachusetts Ave.  
Cambridge, MA 02140  
[mewen@indecon.com](mailto:mewen@indecon.com)

The OSBA will participate in this proceeding to assure that the interests of small business customers are adequately represented and protected.

After an initial review of the materials submitted by PECO, the OSBA has identified the following list of issues that it will evaluate in this proceeding:

- (1) Whether the Company’s actual and forecast lost and unaccounted-for gas rates are reasonable and consistent with Commission guidelines.
- (2) Whether the Company’s gas price hedging strategy is consistent with Commission-approved practice or is otherwise reasonable.
- (3) Whether the Company’s design day demand forecasting method and its resulting peak day capacity requirements are consistent with Commission-approved practice or are otherwise reasonable.
- (4) Whether the Company’s gas supply mix and strategy for diversification are consistent

with Commission-approved practice or are otherwise reasonable.

(5) Whether the Company's strategy for capacity release, off-system sales, asset management arrangements, and storage fill agreements is consistent with Commission-approved practice or is otherwise reasonable and serves to minimize costs incurred by PGC customers.

(6) Whether the Company's acquisition strategy for regional and sustainable natural gas is consistent with least cost procurement requirements.

The OSBA reserves the right to pursue additional issues that may arise throughout this proceeding.

#### **IV. SERVICE OF DOCUMENTS**

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date<sup>1</sup> as satisfying the in-hand requirement.

**The OSBA requests that email delivery of documents also be provided to its witnesses identified above.**

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

#### **V. SETTLEMENT**

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

---

<sup>1</sup> In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

**VI. HEARING AND BRIEFING SCHEDULE**

At the time of this writing the parties are working on a proposed procedural schedule.

Respectfully submitted,

*/s/ Steven C. Gray*

---

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA. 17101

Dated: June 20, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission** :  
 :  
 v. : **Docket No. R-2025-3054868**  
 :  
**PECO Energy Company – 1307(f)** :

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable F. Joseph Brady  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Philadelphia District Office  
801 Market Street  
Philadelphia, PA 19107  
[fbrady@pa.gov](mailto:fbrady@pa.gov)

Michael A. Podskoch, Jr., Esquire  
Bureau of Investigation & Enforcement  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)

Katherine Kennedy, Esquire  
Harrison W. Breitman, Esquire  
PA Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101-1923  
[KKennedy@paoca.org](mailto:KKennedy@paoca.org)  
[HBreitman@paoca.org](mailto:HBreitman@paoca.org)

Legal Assistant Pamela McNeal  
[pmcneal@pa.gov](mailto:pmcneal@pa.gov)

Courtney L. Schultz, Esquire  
Shane P. Simon, Esquire  
Kruti B. Patel, Esquire  
Saul Ewing LLP  
1500 Market Street, 38th Floor  
Philadelphia, PA 19102  
[courtney.schultz@saul.com](mailto:courtney.schultz@saul.com)  
[shane.simon@saul.com](mailto:shane.simon@saul.com)  
[kruti.patel@saul.com](mailto:kruti.patel@saul.com)

Jack R. Garfinkle, Esquire  
Adesola K. Adegbesan, Esquire  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
[jack.garfinkle@exeloncorp.com](mailto:jack.garfinkle@exeloncorp.com)  
[adesola.adegbesan@exeloncorp.com](mailto:adesola.adegbesan@exeloncorp.com)

Charis Mincavage, Esquire  
Adeolu A. Bakare, Esquire  
Victoria A. Geddis, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[vgeddis@mcneeslaw.com](mailto:vgeddis@mcneeslaw.com)

Date: June 20, 2025

/s/ Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney I.D. No. 77538