



McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Victoria A. Geddis
Telephone: 223.225.4640
Fax: 717.291.2186
vgeddis@mcneeslaw.com

June 20, 2025

Matthew Homsher, 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-2025-3054868

Dear Secretary Homsher:

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 document, please contact the undersigned. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Victoria A. Geddis'.

Victoria A. Geddis
MCNEES WALLACE & NURICK LLC

Counsel to the Philadelphia Area Industrial Energy Users Group

c: Administrative Law Judge F. Joseph Brady (via e-mail)
Pamela McNeal, Legal Assistant to ALJ
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


Kruti B. Patel, Esquire
Courtney L. Schultz, Esquire
Shane P. Simon, Esquire
Saul Ewing LLP
1500 Market Street, 38th Floor
Philadelphia, PA 19102
Kruti.patel@saul.com
Courtney.schultz@saul.com
Shane.simon@saul.com
Counsel for PECO Energy Company

Adesola K. Adegbesan, Esquire
Jack R. Garfinkle, Esquire
Richard G. Webster Jr., Director of Rates
PECO Energy Company
2301 Market Street S23-1
Philadelphia, PA 19103
adesola.adegbesan@exeloncorp.com
jack.garfinkle@exeloncorp.com
dick.webster@exeloncorp.com

Michael A. Podskoch, Jr., Esq.
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
mpodskoch@pa.gov

Steven C. Gray, Esq.
Office of Small Business Advocate
Forum Place, 1st Floor
555 Walnut Street
Harrisburg, PA 17101
sgray@pa.gov
ra-sba@pa.gov

Katherine Kennedy, Esq.
Harrison W. Breitman, Esq.
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Forum Place
Harrisburg, PA 17101-1923
kkennedy@paoca.org
hbreitman@paoca.org
OCA25PGWBRC@paoca.org



Victoria A. Geddis

Counsel to the Philadelphia Area Industrial
Energy Users Group

Dated this 20th day of June, 2025, in Radnor, Pennsylvania

II. SERVICE LIST

For purposes of this proceeding, the names and address of the attorneys representing PAIEUG are below:

Charis Mincavage (I.D. No. 82039)
Adeolu A. Bakare (I.D. No. 208541)
Victoria A. Geddis (I.D. No. 335500)
McNEES WALLACE & NURICK LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
Phone: (717) 232-8000
Fax: (717) 237-5300
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
vgeddis@mcneeslaw.com

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 PECO's delivery service, retainage charges, pipeline capacity cost assignment, penalty charges, and daily and monthly imbalance penalties, PAIEUG seeks to participate 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

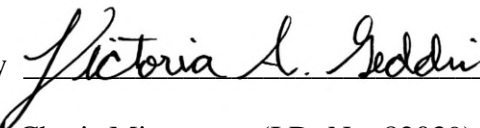
PAIEUG will cooperate with the ALJ and the parties at the Prehearing Conference to finalize the procedural schedule, inclusive of the deadlines for submitting non-company direct and rebuttal testimony, and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJ.

VI. POSSIBILITY OF SETTLEMENT

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

Respectfully Submitted,

McNEES WALLACE & NURICK LLC

By 

Charis Mincavage (I.D. No. 82039)
Adeolu A. Bakare (I.D. No. 208541)
Victoria A. Geddis (I.D. No. 335500)
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P.O. Box 1166
Harrisburg, PA 17108-1166
Phone: (717) 232-8000
Fax: (717) 237-5300
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abakare@mcneeslaw.com
vgeddis@mcneeslaw.com

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Dated: June 20, 2025