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December 31, 2025

VIA E-FILING

Matthew Homsher, 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 V Energy Efficiency and Conservation Plan; Docket No. M-2025-3057328

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 cursive script that reads 'Charis Mincavage'.

Charis Mincavage
MCNEES WALLACE & NURICK LLC

Counsel to the Philadelphia Area Industrial Energy Users Group

c: Marta Guhl, Administrative Law Judge (via e-mail)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served 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).

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Charis Mincavage

Counsel to Philadelphia Area Industrial
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Dated this 31st day of December, 2025, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company	:	
For Approval of its Act 129 Phase V	:	Docket No. M-2025-3057328
Energy Efficiency and Conservation Plan	:	

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

Pursuant to the December 30, 2025, Prehearing Conference Order issued by Administrative Law Judge ("ALJ") Marta Guhl, the Philadelphia Area Industrial Energy Users Group ("PAIEUG") hereby submits this Prehearing Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

On December 1, 2025, PECO petitioned the Commission for approval of the Company's Phase V Energy Efficiency & Conservation ("EE&C") Plan ("Phase V Plan"). PECO's Petition for Approval of its Phase V Plan ("Petition") outlines PECO's proposal to address the requirements of Act 129 and the PUC's Phase V Implementation Order entered on June 18, 2025, at Docket No. M-2025-3052826 ("Implementation Order"). *See* Petition, p. 1.

According to PECO, the Company employed a market-based approach in order to design Phase V programs that will satisfy PECO's Phase V energy savings and peak demand reduction targets. *See id.* at 1-2, 7-8. PECO proposes to recover the accompanying costs through the Phase V Energy & Conservation Program Charge ("Phase V EEPC"), which will be fully reconcilable and non-bypassable. *See id.* at 11-12. As a result, PECO's Phase V Plan costs and program measures may impact the rates and services of PECO's largest customers. It is therefore

imperative that PECO implement its Phase V EE&C Plan in a just and reasonable manner, consistent with Act 129, the Implementation Order, and all applicable statutes and regulations.

PAIEUG filed a Petition to Intervene in this proceeding on December 18, 2025. A description of PAIEUG is set forth in Paragraph 1 of PAIEUG's Petition to Intervene.

A Prehearing Conference has been scheduled in this proceeding for January 5, 2026.

II. SERVICE LIST

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

Charis Mincavage (I.D. No. 82039)
Adeolu A. Bakare (I.D. 208541)
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For purposes of the Prehearing Conference, Ms. Mincavage will be the primary speaker on behalf of PAIEUG.

III. ANTICIPATED ISSUES AND SUB-ISSUES

PAIEUG is concerned with issues regarding the terms and conditions of its members' electricity service. Specifically, PAIEUG is concerned with the cost of PECO's Phase V Plan and potential rate impact upon PECO's Large Commercial and Industrial ("C&I") customers. PAIEUG also reserves the right to raise further issues as necessary and appropriate during the course of this proceeding and to respond to issues raised by other parties.

III. PROPOSED WITNESSES

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 ALJs 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.

IV. PROPOSED SCHEDULE AND DISCOVERY RULES

PAIEUG will cooperate with the ALJ and the parties at the Prehearing Conference to finalize the procedural schedule and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJ.

V. 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: December 31, 2025