



January 2, 2026

*Via Electronic Filing*

Secretary Matthew Homsher  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
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**

*Prehearing Memorandum of the Tenant Union Representative Network*

Dear Secretary Homsher,

Enclosed for electronic filing please find the **Prehearing Memorandum of the Tenant Union Representative Network (“TURN”)** in the above captioned matter.

A copy of this Petition is being served via email, as indicated on the attached Certificate of Service.

Sincerely,

Counsel for TURN  
Community Legal Services, Inc.

Encl.

Cc: Administrative Law Judge Marta Guhl (mguhl@pa.gov)  
Certificate of Service



**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**CERTIFICATE OF SERVICE**

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

**VIA EMAIL**

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A handwritten signature in black ink, appearing to read 'Joline R. Price'.

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January 2, 2026

*Counsel for TURN*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**Pre-Hearing Memorandum of Tenant Union Representative Network**

Tenant Union Representative Network (TURN), through counsel Community Legal Services, Inc., hereby submits the following Pre-Hearing Memorandum pursuant to the Prehearing Conference Order of December 30, 2025. Joline R. Price will be the primary speaker for TURN for purposes of the January 5, 2026, prehearing conference.

TURN will be represented in this proceeding by the attorneys listed below, who will accept electronic delivery of documents.

Joline R. Price, Esq. (Attorney ID: 315405)  
Benjamin Clark, Esq. (Attorney ID: 335697)  
Charlotte Edelstein, Esq. (Attorney ID: 334505)  
Robert W. Ballenger, Esq. (Attorney ID: 93434)

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**I. History of the Proceeding**

In accordance with the applicable provisions of Act 129 of 2008 (Act 129), the Commission is charged with developing an energy efficiency and conservation program (EE&C

Program). Act 129 requires Electric Distribution Companies (EDCs) with 100,000 or more customers to develop and file an energy efficiency and conservation plan (EE&C Plan), subject to approval by the Commission, to reduce electric consumption. Pursuant to its EE&C Program, the Commission is tasked with approving EE&C Plans and developing procedures and standards to ensure each EDC has complied with the requirements of the EE&C Program and its EE&C Plan and satisfied the established energy efficiency (EE) and peak demand reduction (PDR) targets. Pursuant to Public Utility Code Section 2806.1(c)(3), the Commission is also charged with the responsibility to evaluate the costs and benefits of the EE&C Program by November 30, 2013, and every five years thereafter. To date, the Commission has implemented four phases of the Act 129 EE&C Program. On June 18, 2025, after review and consideration of comments and reply comments of Companies and other interested parties, the Commission issued its EE&C Program Phase V Implementation Order (Implementation Order), which directed the Phase V EE&C Program to operate from June 1, 2026, through May 31, 2031, and prescribed further energy consumption and PDR targets.

In its Implementation Order, the Commission established a savings carve-out for low-income customers with the aim of helping to ensure that low-income customers are able to access, participate in, and realize benefits from efficiency programs. In the Implementation Order, the Commission directed that PECO obtain 74,456 MWh of savings from programs solely directed at low-income customers or low-income verified participants in multifamily housing. On December 1, 2025, PECO Energy Company (PECO or the Company) filed its Petition for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan (hereinafter, Phase V Plan) at the above-captioned docket.

The five-year cost of the Company's Phase V Plan is projected to be \$427.4 million. Phase V Plan at 9. The Company's programs are designed to produce: (1) 1,458,076 MWh in energy savings, or 131% of PECO's overall energy savings target; and (2) 264.5 MW of PDR, or 136% of its PDR target. *Id.* at 2. As part of Phase V Plan, PECO proposes four residential customer energy efficiency programs: (1) The Residential Program; (2) The Residential Low-Income Subprogram; (3) The Residential Home Energy Reports (HER) Program; and (4) Residential Low-Income HER Subprogram. *Id.* at 9-10.

On December 2, 2025, TURN filed its Petition to Intervene in this matter. On that same date, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed a Petition to Intervene and Answer. The OCA filed a Notice of Intervention and Public Statement on December 9, 2025. On December 18, 2025, the Philadelphia Area Industrial Energy Users Group (PAIEUG) filed its Petition to Intervene. On December 19, 2025, the Office of Small Business Advocate (OSBA) filed a Notice of Intervention and Public Statement. The City of Philadelphia and Philadelphia Energy Authority (PEA) filed a Petition to Intervene on December 26, 2025. The filing was assigned to the Office of Administrative Law Judge and further assigned to Administrative Law Judge Marta Guhl (ALJ) for investigation. On December 30, 2025, the ALJ issued a Prehearing Conference Order directing Prehearing Memoranda be filed by 4:00 pm on Friday, January 2, 2026. A Prehearing Conference on this matter will be held on January 5, 2026.

## **II. Identification of Issues**

Based upon a review of the Phase V Plan, TURN has preliminarily identified the following issues presented by PECO's filing, which affect its members, and which TURN seeks to examine more fully:

- a. Whether PECO's Phase V 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 Demand Response measures to meet established targets for low-income customers in accordance with the requirements of Act 129 and the Implementation Order;
- b. Whether PECO's Phase V Plan and associated implementation plans include sufficient comprehensive measures that benefit low-income customers; and
- c. Whether PECO's proposed EE&C Program measures within its Phase V Plan 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 raise other relevant issues and respond to other issues that may arise in the course of this proceeding.

## **III. Proposed Witnesses and Subject Matter**

Together with CAUSE-PA, TURN intends to jointly sponsor the following expert witness to testify in this matter, and reserves the right to call additional witnesses as may be warranted upon proper notice to Your Honor and the parties:

Jim Grevatt  
Energy Futures Group, Inc.

P.O. Box 587  
Hinesburg, VT 05461  
802-373-2488  
[jgrevatt@energyfuturesgroup.com](mailto:jgrevatt@energyfuturesgroup.com)

Mr. Grevatt will address the issues identified above, as well as other issues that may arise in the course of this proceeding. TURN will inform the parties and Your Honor in the event TURN intends to introduce any other witness testimony, including whether such witness testimony will be sponsored by any other party to these proceedings.

**IV. Proposed Litigation Schedule**

TURN supports the procedural schedule proposed by CAUSE-PA in this proceeding. TURN will work with the Company and the parties on a procedural schedule that is a reasonable compromise of the parties' competing interests within the time afforded for litigation of this matter.

**V. Settlement**

TURN will participate in settlement discussions in this matter.

**VI. Discovery**

TURN supports the discovery modifications proposed by the OCA in this matter.

**VII. Conclusion**

TURN respectfully requests that this memorandum be entered into the record of this proceeding.

Respectfully submitted,

/s/ Joline R. Price

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Joline R. Price, Esq. (Attorney ID: 315405)  
Benjamin Clark, Esq. (Attorney ID: 335697)  
Charlotte Edelstein, Esq. (Attorney ID: 334505)  
Robert W. Ballenger, Esq. (Attorney ID: 93434)

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