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AN EXELON COMPANY

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January 2, 2026

**VIA ELECTRONIC FILING**

Matthew L. 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:

Enclosed please find the **Prehearing Memorandum of PECO Energy Company** for filing in the above-referenced docket. Copies of the Prehearing Memorandum have been served in accordance with the enclosed Certificate of Service.

If you have any questions regarding this filing, please do not hesitate to contact me at 267.533.1999.

Very truly yours,

Jack R. Garfinkle

Enclosures

c: Administrative Law Judge Marta Guhl ([mguhl@pa.gov](mailto:mguhl@pa.gov))  
Per Certificate of Service (w/encls.)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY** :  
**COMPANY FOR APPROVAL OF ITS** :  
**ACT 129 PHASE V ENERGY** : **Docket No. M-2025-3057328**  
**EFFICIENCY AND CONSERVATION** :  
**PLAN** :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served true and correct copies of the **Prehearing Conference Memorandum of PECO Energy Company** on the following individuals in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA ELECTRONIC MAIL**

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Dated: January 2, 2026

*Counsel for PECO Energy Company*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PETITION OF PECO ENERGY</b>	:	
<b>COMPANY FOR APPROVAL OF ITS</b>	:	
<b>ACT 129 PHASE V ENERGY</b>	:	<b>DOCKET NO. M-2025-3057328</b>
<b>EFFICIENCY AND CONSERVATION</b>	:	
<b>PLAN</b>	:	

**PREHEARING CONFERENCE MEMORANDUM OF PECO ENERGY COMPANY**

Pursuant to the Prehearing Conference Order of Administrative Law Judge Marta Guhl, dated December 30, 2025, PECO Energy Company (“PECO” or the “Company”) hereby submits its Prehearing Conference Memorandum (the “Memorandum”) in the above-captioned proceeding and states as follows:

**I. HISTORY OF THE PROCEEDING**

On December 1, 2025, PECO submitted its petition (the “Petition”) to the Pennsylvania Public Utility Commission (the “Commission”) for approval of the Company’s Phase V Energy Efficiency and Conservation Plan (“Phase V Plan” or the “Plan”) to achieve energy and demand reductions in accordance with the requirements of Act 129 of 2008, 66 Pa.C.S. § 2806.1 (“Act 129”), and the Commission’s Implementation Order entered June 18, 2025, at Docket No. M-2025-3052826 (the “*Phase V Implementation Order*”). PECO requests in its Petition that the Commission: (1) find that the Phase V Plan satisfies the requirements of 66 Pa.C.S. § 2806.1(b)(1) and the *Phase V Implementation Order*, including those provisions mandating the implementation of programs designed to achieve the peak demand reduction (“PDR”) and consumption reduction targets established for PECO and the energy savings carve-out for the low-income customer sector; and (2) approve a supplement to PECO’s Electric Service Tariff to implement a Section 1307 surcharge to recover Phase V Plan costs.

PECO served its Petition, Phase V Plan, and supporting testimony on the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Commission’s Bureau of Investigation and Enforcement, and all parties to the Company’s Phase IV Plan proceeding (Docket No. M-2020-3020830). PECO also posted a copy of the filing on its website.

At the time of filing this Memorandum, PECO has been served with a Petition to Intervene and Answer of The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania, dated December 2, 2025; a Petition to Intervene of the Tenant Union Representative Network, dated December 2, 2025; a Notice of Appearance, dated December 4, 2025, and a Notice of Intervention and Public Statement, dated December 19, 2025 by OSBA; a Notice of Appearance, dated December 5, 2025, and a Notice of Intervention and Public Statement dated December 9, 2025 by OCA; a Petition to Intervene by the Philadelphia Area Industrial Energy Users Group, dated December 18, 2025; and a Petition to Intervene of the City of Philadelphia and the Philadelphia Energy Authority, dated December 26, 2025.

## **II. STATEMENT OF ISSUES**

The ultimate issue before the Commission is whether the Company’s Phase V Plan meets the requirements of Act 129 and the *Phase V Implementation Order*. PECO has submitted direct testimony and exhibits with the Petition demonstrating that the Phase V Plan is designed to meet Act 129 and *Phase V Implementation Order* requirements, stay within applicable cost limitations, and provide meaningful opportunities for customers to save energy and money.

The *Phase V Implementation Order* establishes a total Phase V MWh savings target of 1,111,685 MWh for PECO. The Company’s total Phase V PDR target is 194.8 MW. PECO must also obtain 74,456 MWh of its total Phase V savings from programming, solely directed at low-income customers or low-income-verified participants in multifamily housing programs.

The Company's Phase V 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 overall PDR target. The Plan is designed to achieve these savings and PDRs while remaining within the Company's Phase V spending cap of \$427.4 million.

### III. WITNESSES

PECO submitted the direct testimony of the following witnesses with its Petition and Phase V Plan:

**PECO Statement No. 1, Direct Testimony of Urmila Dighe.** Ms. Dighe is the Senior Manager of PECO's Energy Efficiency Portfolio, and her testimony provides an overview of the Phase V Plan, including Act 129 and Phase V obligations;

- **PECO Statement No. 2, Direct Testimony of Marina Geneles.** Ms. Geneles is PECO's Manager of Demand Response & Energy Efficiency Evaluation, and her testimony describes PECO's market-based Plan design process, the programs comprising the Plan, and expected research and development efforts during Phase V;
- **PECO Statement No. 3, Direct Testimony of Mark van Eeghen.** Mr. van Eeghen is an Associate Director at Guidehouse, Inc. and his testimony summarizes PECO's Phase V projected energy and demand savings, program expenditures, and Total Resource Cost net benefits; and
- **PECO Statement No. 4, Direct Testimony of Megan A. McDevitt.** Ms. McDevitt is PECO's Senior Manager of Strategic Initiatives, and her testimony discusses the Phase V Plan's cost recovery mechanism and tariff.

PECO may present additional witnesses to address the direct testimony of other parties; however, such witnesses cannot be identified until the direct testimony of other parties is served on PECO and evaluated.

#### IV. PROPOSED SCHEDULE

The Company proposes the following schedule for this proceeding:

January 16, 2026	Non-Company Direct Testimony
January 27, 2026	Rebuttal Testimony
February 3-4, 2026	Hearings (One or Two Days)
February 12, 2026	Briefs
February 23, 2026	PECO Reply Comments and/or Revised Plan

#### V. DISCOVERY AND PROTECTIVE ORDER

PECO agrees to work with the parties to conduct discovery in an expeditious manner. The OCA's proposed discovery modifications are acceptable to PECO with the following revisions:

1. The time period for responses to new discovery served before, on, and after the Prehearing Conference should continue to be governed by the modified 10-day discovery period already expressly established by the Commission.<sup>1</sup> PECO agrees to a reduction in time for responses after non-Company direct testimony is served to five (5) business days if its proposed schedule is adopted; and
2. PECO agrees to the OCA's three (3)-calendar-day period for written objections to discovery, motions to dismiss objections, and/or direct the answering of interrogatories and/or requests for production, and answers to such motions provided that any objection or answer that would be due on a Saturday or Sunday shall be due on the following business day.

PECO is preparing a proposed Protective Order for use in this proceeding and will submit the proposed Protective Order to the Administrative Law Judge for consideration after circulating the proposed Protective Order to other parties.

#### VI. POSSIBILITY OF SETTLEMENT

PECO intends to engage in settlement discussions and informal resolution of issues to the extent other parties are amenable to such discussions.

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<sup>1</sup> See Opinion and Order, *Energy Efficiency and Conservation Program*, Docket No. M-2025-3052826, p. 12.

**VII. LEAD ATTORNEY FOR THE PREHEARING CONFERENCE**

The lead attorney for purposes of the Prehearing Conference will be Catherine Vasudevan of Morgan, Lewis & Bockius LLP.

**VIII. CONCLUSION**

WHEREFORE, PECO Energy Company submits this Prehearing Conference Memorandum and respectfully requests that Administrative Law Judge Guhl approve the proposed schedule herein.

Respectfully submitted,



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January 2, 2026

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