



COMMONWEALTH OF PENNSYLVANIA

June 15, 2026

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 – Gas Division –
1307(f) / Docket No. R-2026-3062148**

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/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures

cc: Justin Bieber
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2026-3062148
v.	:	
	:	
PECO Energy Company - Gas	:	
Division – 1307(f)	:	

**OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of Small Business consumers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“the Act”). To discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Representing the OSBA in this matter is Assistant Small Business Advocate Rebecca Lyttle. Please address all correspondence as follows:

Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
relyttle@pa.gov

II. FILING BACKGROUND

On April 30, 2026, PECO Energy Company (“PECO Gas” or “Company”) submitted its pre-filing information in support of its annual reconciliation of purchased gas cost (“PGC”) rates, pursuant to Sections 53.64 and 53.65 of the Commission’s Rules and Regulations. 52 Pa. Code §§ 53.64-65. On May 28, 2026, PECO Gas submitted its definitive annual PGC filing to the Commission pursuant to Section 1307(f) of the Public Utility Code, 66 Pa. C.S. Section 1307(f).

OSBA filed its Complaint on June 4, 2026.

III. IDENTIFICATION OF WITNESS

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

Justin Bieber
Energy Strategies
111 East Broadway, Suite 1200
Salt Lake City, UT 84111
jbieber@energystrat.com

The OSBA requests that all parties provide courtesy copies of all documents, including discovery, testimony, and briefs to Mr. Bieber, simultaneously with service upon the OSBA.

IV. IDENTIFICATION OF ISSUES

The OSBA is participating in the case to assure that the interests of Small Business customers of PECO Gas are adequately represented and protected. After an initial review of the materials submitted by the Company, the OSBA has identified the following issues for further examination:

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 PECO Gas Small Business customers.
6. Whether the Company's acquisition strategy for regional and sustainable natural gas is consistent with least cost procurement requirements.
7. Any other issues that may arise during this proceeding that may adversely affect Small Business customers.

As appropriate and necessary, the OSBA will investigate and analyze the claims and proposals of the Company and other parties through discovery, through the cross-examination of witnesses appearing for those parties, through the filing of testimony, and through briefing. The OSBA will particularly focus on any issue where the impact on the interests of the Company's Small Business consumers would be unjustifiably different than, or disproportionate to, the impact on another class of customers, or otherwise lacking in reasonableness or basic fairness.

The OSBA reserves the right to pursue additional issues as they arise throughout the 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 date¹ as satisfying the in-hand requirement.

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

The OSBA requests that email delivery of documents also be provided to its witness 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.

VI. HEARING AND BRIEFING SCHEDULE

The OSBA will cooperate with the other parties to develop a procedural schedule.

Respectfully submitted,

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Dated: June 15, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2026-3062148
v.	:	C-2026-3062960
	:	
PECO Energy Company - Gas	:	
Division – 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, Suite 4063
Philadelphia, PA 19107
fbrady@pa.gov

Legal Assistant Pamela McNeal
pmcneal@pa.gov

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Date: June 15, 2026

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