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June 15, 2026

VIA E-MAIL

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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

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 'Charis Mincavage'.

Charis Mincavage
MCNEES WALLACE & NURICK LLC

Counsel to the Philadelphia Area Industrial Energy Users Group

c: F. Joseph Brady, Administrative Law Judge (fbrady@pa.gov)
Pam McNeal, Legal Assistant (pmcneal@pa.gov)
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).

VIA EMAIL

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Charis Mincavage

Counsel to Philadelphia Area Industrial
Energy Users Group

Dated this 15th day of June, 2026, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2026-3062148
	:	
PECO Energy Company	:	

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

As requested by Administrative Law Judge ("ALJ") F. Joseph Brady in his Prehearing Conference Order dated June 4, 2026, the Philadelphia Area Industrial Energy Users Group ("PAIEUG") hereby submits this Prehearing Memorandum.

I. HISTORY OF THE PROCEEDING

On April 30, 2026, PECO Energy Company ("PECO" or "Company") submitted its preliminary Purchased Gas Cost ("PGC") filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission"), pursuant to Section 1307(f) of the Public Utility Code, 66 Pa. C.S. § 1307(f). On May 28, 2026, PECO submitted supporting testimony and associated exhibits setting forth the Company's proposed gas recovery rates, effective for service rendered on and after December 1, 2026.

On May 13, 2026, PAIEUG filed a Petition to Intervene in this proceeding.¹ A description of PAIEUG is set forth in Paragraph 4 of PAIEUG's Petition to Intervene. PAIEUG's Petition to Intervene is outstanding and awaits disposition by the ALJ.

A Prehearing Conference has been scheduled in this proceeding for June 16, 2026.

¹ As compared to the June 4 Prehearing Order, which lists PAIEUG's Intervention date as May 28, 2026.

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)
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III. ANTICIPATED ISSUES AND SUB-ISSUES

Because changes to the Company's PGC 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 

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Users Group

Dated: June 15, 2026