

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Consumer Advocate

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November 10, 2010

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: PPL Electric Utilities Corporation Energy
Efficiency and Conservation Plan
Docket No. M-2009-2093216

Dear Secretary Chiavetta:

Enclosed for filing is the Second Prehearing Memorandum of the Office of Consumer Advocate, in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "James A. Mullins".

James A. Mullins
Assistant Consumer Advocate
PA Attorney I.D. # 77066

Enclosures

cc: Honorable Dennis J. Buckley
Honorable Elizabeth H. Barnes

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation : Docket No. M-2009-2093216
Energy-efficiency and Conservation Plan :

SECOND PREHEARING MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to Section 333 of the Public Utility Code, 66 Pa.C.S. § 333, and in response to the Prehearing Conference Order issued in the above-captioned matter on November 4, 2009, the Office of Consumer Advocate (OCA) provides the following information:

I. INTRODUCTION

On July 1, 2009, PPL Electric Utilities Corporation (PPL or Company) filed its Energy Efficiency and Conservation (EE&C) Plan with the Commission. The proposed EE&C Plan consisted of 14 voluntary programs for customers and described an extensive portfolio of energy-efficiency, conservation, and peak load reduction measures, programs, and education. These 14 programs are designed to meet the goals established by Sections 2806.1 and 2806.2 of Act 129. The EE&C Plan also incorporated elements of PPL's coordination activities with Pennsylvania's other electric distribution companies, including ideas, insights, and consistent program features, design elements, and implementation details. For residential customers, PPL proposed to offer the following programs: 1) Efficient Equipment Incentive Program, 2)

Residential Energy Assessment & Weatherization, 3) Compact Fluorescent Lighting Campaign, 4) Appliance Recycling, 5) ENERGYSTAR New Homes, 6) Renewable Energy Program, 7) Direct Load Control, 8) Time of Use Rates, and 9) Energy Efficiency Behavior & Education. Additionally, for low-income customers, PPL proposed to offer Low-Income WRAP and E-Power Wise Program. PPL requested that the Commission approve all of these programs together as an integrated portfolio designed to meet Act 129 energy-efficiency and conservation goals in the Company's service territory.

The Company also proposed to implement an Act 129 Compliance Rider (ACR) to be applied, on a non-bypassable basis, to charges for electricity supplied to customers who receive distribution service from the Company. The ACR was proposed to be computed separately for Residential, Small Commercial and Industrial, and Large Commercial and Industrial classes. The rider was proposed to be applied to the monthly bill of each customer receiving distribution service from the Company and to be reconciled on an annual basis for under-collections and over-collections experienced during the previous year.

The Company's filing was assigned to the Office of Administrative Law Judge and further assigned to Administrative Law Judge Susan D. Colwell for investigation. The OCA filed a Notice of Intervention in this proceeding on July 7, 2009 and has been an active participant in this proceeding since that time. The OCA has also participated in the PPL Stakeholder process regarding these programs.

On September 15, 2010, PPL filed a Petition with the Commission seeking approval of two modifications to the Company's PUC-approved EE&C Plan: (1) a change to PPL's Compact Fluorescent Lighting Program and (2) a change to the classification of direct and common costs. The Office of Small Business Advocate filed an answer to PPL's Petition on

October 5, 2010. On October 15, 2010, "Recommendations for Plan Improvement" were filed by the UGI Distribution Companies. Comments were file also filed by the PPL Industrial Customer Alliance (October 19, 2010) and Pennsylvania Communities Organizing for Change (October 18, 2010). The OCA now submits this Prehearing Memo pursuant to the Prehearing Conference Order issued by Administrative Law Judges Dennis J. Buckley and Elizabeth H. Barnes.

II. ISSUES AND SUB-ISSUES

The OCA anticipates that the issue to be addressed is whether PPL's proposed modifications to its Compact Fluorescent Lighting Program and classification of direct and common costs is reasonable.

III. WITNESSES

If the OCA determines that testimony is necessary, the OCA identifies the following potential witness or witnesses:

Shaun Enterline
Scudder Parker
Vermont Energy Investment Corporation
255 S. Champlain St, Suite 7
Burlington, VT 05401
Phone: 802-658-6060
Email: senterline@veic.org; sparker@veic.org

IV. SERVICE ON OCA

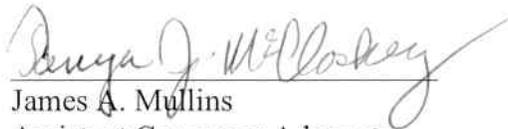
The OCA will be represented in this case by Assistant Consumer Advocate, James A. Mullins and Senior Assistant Consumer Advocate, Tanya J. McCloskey. Two copies of all documents should be served on the OCA as follows:

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As a courtesy, the OCA requests that all electronic correspondence be copied to Jessica J.

Horner (JHorner@paoca.org).

Respectfully Submitted,



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Dated: November 10, 2010
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CERTIFICATE OF SERVICE

PPL Electric Utilities Corporation : Docket No. M-2009-2093216
Energy Efficiency and Conservation Plan :

I hereby certify that I have this day served a true copy of the foregoing document, Second Prehearing Memorandum of the Office of Consumer Advocate, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 10th day of November 2010.

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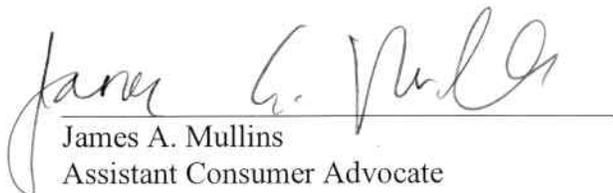
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A handwritten signature in cursive script, reading "James A. Mullins". The signature is written in black ink and is positioned above a horizontal line.

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