

**BEFORE THE  
Pennsylvania Public Utility Commission**

Pennsylvania Public Utility Commission v. PPL  
Electric Utilities Corporation Supplement No. 118 to Tariff  
- Electric Pa. P.U.C. No. 201, Docket No. R-2012-229057

**Prehearing Memorandum**

May 25, 2012

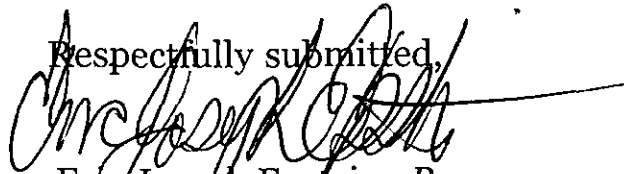
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

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Dear Secretary Chiavetta:

Eric Joseph Epstein ("Epstein" or "Mr. Epstein") hereby submits an original and three (3) copies of his Prehearing Memorandum in the above-captioned proceeding. Mr. Epstein intends to fully participate in this proceeding as an "active" party. Mr. Epstein 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.

Respectfully submitted,



Eric Joseph Epstein, *Pro se*  
4100 Hillside Road  
Harrisburg, PA 17112  
(717)-541-1101 Phone  
[lechambon@comcast.net](mailto:lechambon@comcast.net)

cc: Certificate of Service

**BEFORE THE  
Pennsylvania Public Utility Commission**

**Re: Pennsylvania Public Utility Commission  
v. PPL Electric Utilities Corporation;  
Docket No. R-2012-229057**

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**Prehearing Memorandum**

**I. History of the Proceeding**

1) On March 30, 2012, PPL Electric Utilities (“PPL” or “the Company”) announced it will seek a rate increase for distribution rates with the Pennsylvania Public Utility Commission (“PUC” or “Commission”).

2) PPL’s current proposed rate increase request of \$104.6 “would produce an average increase in distribution rates of approximately 13% “according to PPL in a letter to the Pennsylvania Public Utility Commission dated March 30, 2012.

3) This proposed rate hike would actually be a 16.5% increase for the average residential electric electric bill (assuming a 1,000 Kwh consumption level) or a \$7.00 per month spike. ( Letter from the Office of Consumer Advocate, April 30, 2012.)

4) On May 17, 20112, the matter was assigned the Honorable Susan D. Colwell Administrative Law Judge (“ALJ”) with the Pennsylvania Public Utility Commission (“PUC” or Commission”) who Ordered an Initial Prehearing conference for Thursday, May 31, 2010 at 10:00 am in Hearing Room #2, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA.

5) On May 16, 2012, William H. Spense, chairman, president and CEO of PPL Corporation told PPL shareholders, "We are forecasting that 70 percent of PPL's 2012 ongoing earnings will come from our rate-regulated businesses in the United Kingdom, Kentucky and Pennsylvania."

6) Mr. Spense said PPL is "a fundamentally a different company," than it was in 2010, and the repositioning of PPL was completed through the acquisition of regulated utility operations in Kentucky in 2010 and the United Kingdom in 2011 at a combined cost of about \$14 billion.

7) On May 21, 2012, Eric Joseph Epstein's ("Mr. Epstein" or "Epstein") filed a Complaint and a Petition to Intervene in the Above-Referenced Proceeding.

## **II. Statement of Issues**

8) Mr. Epstein is a residential customer of PPL Electric Utilities Corporation.

9) PPL's proposal to recover "indirect and direct costs" will impact Mr. Epstein's rates.

10) Eric Joseph Epstein is presently analyzing PPL's assumptions, estimates, projections, methodologies, undocumented statements, citations, predictions, and conclusions associated with the Company's Filing.

11) Mr. Epstein's evaluation of PPL's Testimony found numerous unproved assumptions, unsubstantiated statements, poor planning and practices.

- a) The amount of the requested rate increase is just and appropriate;
- b) The expenses claimed by PPL were prudently incurred;
- c) PPL's proposed rate structure and rate design are appropriate;
- d) The allocation of the proposed distribution rate increase between and among customer classes is just, reasonable and nondiscriminatory;
- e) The rate of return on equity proposed by PPL, and other aspects of the Company's proposal result in a fair rate of return;
- f) PPL's cost and quality of service is accurate, legitimate, and appropriately allocated;
- g) Appropriateness and accuracy of PPL's accounts, depreciation accruals and accrued deprecations and annual amortization rates;
- h) Reconciliation of PPL's accounts, depreciation accruals and accrued deprecations and annual amortization rates to ensure consistency the Company's Revenue Neutral Reconciliation Tax Assessments in terms of accounts, depreciation accruals and accrued deprecations and annual amortization rates;
- i) Cost sharing, responsibilities, liabilities and cost burdens associated with environmental remediation.

12) Mr. Epstein reserves the right to raise any issues or questions relating to any discrepancies or errors in the Above-Referenced proceeding.

13) Eric Joseph Epstein anticipates pursuing these issues during this proceeding, and reserves the right to address other issues of concern, and to respond to issues raised by other Parties.

### **III. Proposed Witnesses**

14) Mr. Epstein respectfully reserves the right to modify or supplement his witness list during the course of this proceeding. In the event that Eric Joseph Epstein decides to modify or supplement his witness list, Epstein will inform the parties and the Administrative Law Judge.

### **IV. Proposed Schedule & Discovery Rules**

15) Mr. Epstein will fully cooperate with the Court and the Parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any ALJ directives.

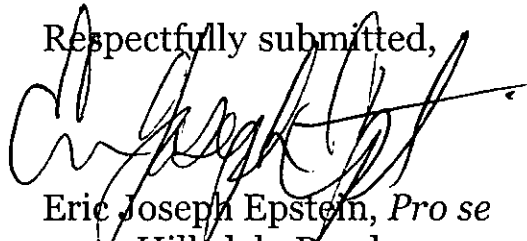
### **V. Public Input Hearings**

16) Mr. Epstein will attend and participate in Public Input Hearings.

### **VI. Settlement Discussions**

17) Eric Joseph Epstein is willing to participate in Settlement discussions and negotiations with the other parties to resolve all outstanding issues in this proceeding.

Respectfully submitted,



Eric Joseph Epstein, *Pro se*  
4100 Hillside Road  
Harrisburg, PA 17112

Dated: May 25, 2012

## CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the active participants named below by US mail or hand delivery or electronic transmission in accordance with the requirements of Section 1.54.

The Honorable Susan D. Colwell  
Administrative Law Judge  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, Pa 17120

Paul E. Russell, Esquire  
Two North Ninth Street  
Allentown, PA 18101-1179

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John H. Isom, Esquire  
PPL  
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Candis A. Tunilo, Esquire  
Darryl Lawrence, Esquire  
Office of Consumer Advocate  
Forum Place, 5th Floor  
555 Walnut Street  
Harrisburg, PA 17101-1921

Todd s. Stewart, Esquire  
Hawke, McKeon & Sniscak  
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100 North Tenth Street  
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Harrisburg, Pa 17101

Steven Gray, Esquire  
Office of SBA  
Commerce Building, Suite 1102  
300 North Second Street  
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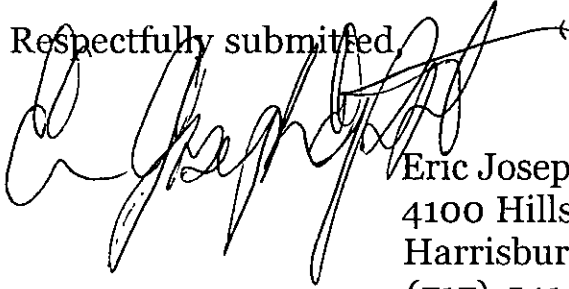
Scott Rubin, Esquire  
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333 Oak Lane  
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CEO  
1460 Wyoming Avenue  
Forty Fourt, PA 18704

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SEF c/o  
316 Yorkshire Drive  
Harrisburg, PA 17111

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric Joseph Epstein", written over the text "Respectfully submitted,".


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May 25, 2012



Mr. Eric Epstein  
4100 Hillsdale Rd  
Harrisburg, PA 17112



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

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