

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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January 7, 2015

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

Re: Pa. Public Utility Commission
v.
PPL Electric Utilities Corporation –
(Storm Damage Expense Rider)
Docket No. R-2012-2290597

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served upon all parties of record as shown on the attached Certificate of Service.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Darryl A. Lawrence".

Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682

Enclosures

cc: Honorable Susan D. Colwell
Certificate of Service

200282

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission,	:	
	:	
v.	:	Docket No. R-2012-2290597
	:	
PPL Electric Utilities Corporation	:	

PREHEARING MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to Section 333 of the Public Utility Code, 66 Pa. C.S. Section 333, and in response to the Prehearing Conference Order issued by Administrative Law Judge Susan D. Colwell (Judge Colwell) in the above-captioned matter, the Office of Consumer Advocate (OCA) provides the following information:

I. INTRODUCTION

On October 31, 2014, PPL Electric Utilities Corporation (PPL or the Company) filed Supplement No. 165 to Tariff Electric-Pa. P.U.C. No. 201. In Supplement No. 165, the Company proposed to implement a Storm Damage Expense Rider (SDER). The SDER would become effective January 1, 2015. Also on October 31, 2014, PPL filed its Preliminary Calculation of the SDER. PPL provided that a final rate calculation for the SDER would be filed sometime in mid-December, 2014. The proposed initial charge to residential customers for the SDER, based on PPL's preliminary calculations, is \$0.00040/Kwh. The OCA filed a Complaint against the proposed SDER on December 3, 2014.

On December 18, 2014, the Pennsylvania Public Utility Commission (Commission) issued an Order suspending the proposed tariff filing and assigned this matter to the Office of Administrative Law Judge for scheduling of hearings as may be required. On December 19, 2014, the Company filed its final rate calculations for the SDER. The proposed charge to residential customers for the SDER is \$0.00040/Kwh.

II. ISSUES AND SUB-ISSUES

Based upon a preliminary analysis of PPL's SDER filing, the OCA has identified the following issue that it will investigate as part of this matter:

- Whether the reconciliation and proposed charges included in the SDER conform to the tariff and the Commission's Order in this matter.

III. WITNESSES

The OCA has not retained a witness for this proceeding, at this time. Should the OCA determine that a witness will be necessary for any portion of its case, the OCA will promptly notify Judge Colwell and all parties of record.

IV. SERVICE ON THE OCA

The OCA will be represented in this case by Senior Assistant Consumer Advocate Darryl Lawrence. Two copies of all documents should be served on the OCA as follows:

Darryl Lawrence
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V. DISCOVERY

The OCA has participated in informal discovery talks with the Company as to questions raised by the SDER filing. As a result of these discussions, many of the OCA's questions have been answered. The OCA is not seeking any modifications to the Commission's regulations as to discovery in this matter.

VI. PUBLIC INPUT HEARINGS

The OCA has received no requests for public input hearings at this time. Should such a request be received, the OCA will promptly advise Judge Colwell and the parties of same.

VII. PROPOSED SCHEDULE

The schedule as set out in Judge Colwell's Prehearing Conference Order is acceptable to the OCA.

Respectfully submitted,



Darryl Lawrence
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E-mail: DLawrence@paoca.org
Senior Assistant Consumer Advocates

Counsel for:
Tanya J. McCloskey
Acting Consumer Advocate

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January 7, 2014

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CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation – (Storm
Damage Expense Rider)
Docket No. R-2012-2290597

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

Dated this 7th day of January 2015.

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