

**BEFORE THE
Pennsylvania Public Utility Commission**

Pennsylvania Public Utility Commission:

v. PPL Electric Utilities Corporation : Docket No. R-2015-2469275
Supplement No. 179 to Tariff - :
Electric Pa. P.U.C. No. 201 :

Prehearing Memorandum

April 30, 2015,

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

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*
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cc: Certificate of Service

**Before the
Pennsylvania Public Utility Commission**

Eric Joseph Epstein :
 v. : **R-2015-2469275**
PPL Electric Utilities :
Corporation :

Prehearing Memorandum

I. History of the Proceeding

1) PPL Electric Utilities Corporation (“PPL” or “the Company”) filed a letter with the Commission on February 27, 2015 stating it will be filing for a rate increase. PPL is requesting”

2) PPL filed Supplemental No. 179 to Tariff - Electric Pa. P.U.C. No. 201.

3) The proposed tariff if approved would increase retail distortion rates by \$1675 million per year.

4) The tariff would create an overall 18.5% increase on distribution rates.

5) The residential rate increase is steep. Distribution charges would increase from \$14.09 to \$20.00 per month (but on daily rate) and variable charge to increase from \$0.02511 to \$0.03209 /kWh.

6) For a 1000 kWh residential customer, distribution rates would increase from \$39.20 to \$52.90 (132%).

7) PPL is also submitting a request to increase its DSIC cap from 5% to 7.5%.

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 depreciations and annual amortization rates;

h) Appropriateness of consulting and legal costs;

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 Hillsdale Road
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Dated: April 30, 2015

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
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Dated: April 30, 2015