



COMMONWEALTH OF PENNSYLVANIA

January 4, 2016

E-FILED

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

**Re: Petition of PPL Electric Utilities Corporation for Approval of its
Act 129 Phase III EE&C Plan – Docket No. M-2015-2515642**

Dear Secretary Chiavetta:

I am delivering for filing today the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

Copies have been served on Administrative Law Judge Susan Colwell, as well as on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Rose Triscari".

Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921

Enclosures

cc: The Honorable Susan D. Colwell
Parties of Record
Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation :
for Approval of its Act 129 Phase III Energy : Docket No. M-2015-2515642
Efficiency and Conservation Plan :**

**OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission (the “Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§399.41 – 399.50 (“the Act”). In order to discharge this statutory duty, the Office of Small Business Advocate deems it necessary to participate as a party to this proceeding. Please address all correspondence as follows:

Elizabeth Rose Triscari
Deputy Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
etriscari@pa.gov

II. PROCEDURAL BACKGROUND

On November 30, 2015 PPL Electric Utilities Corporation (“PPL” or “Company”) filed a Petition for Approval of its Act 129 Phase III Energy and Conservation Plan (“Phase III Plan”).

On December 17, 2015, the OSBA filed a Notice of Intervention and Public Statement in each proceeding.

A Notice of Intervention and Public Statement was also filed by the Office of Consumer Advocate (“OCA”) on December 10, 2015.

By Notice in the Pennsylvania Bulletin on December 12, 2015, responsive pleadings were directed to be filed within 20 days of publication, which is January 4, 2015. The OSBA is filing an Answer concurrently with this Prehearing Memorandum.

Administrative Law Judge (“ALJ”) Susan D. Colwell has been assigned to this proceeding. On December 8, 2015, a Prehearing Conference Notice was issued scheduling a prehearing conference for January 5, 2016. ALJ Colwell issued a Prehearing Conference Order on December 18, 2015. The OSBA submits this Prehearing Memorandum in accordance with that Order.

III. WITNESS

Assisting in the development and presentation of the OSBA's position in this proceeding will be:

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 – Fax
rdk@indecon.com

The OSBA requests that all parties provide courtesy copies of all documents, including discovery, testimony and briefs, to Mr. Knecht, simultaneously with service upon the OSBA.

IV. IDENTIFICATION OF ISSUES

The OSBA is participating in this case to ensure that the interests of small business customers of the Company are adequately represented and protected.

At this time, the OSBA is concentrating on the following issues:

1. Whether the overall level of utility costs for the various rate classes is reasonably commensurate to distribution voltage energy consumption, or an adequate explanation for any major variation is provided by the Company;
2. Whether program beneficiaries for small business programs bear a reasonable share of the cost of each program, both in absolute terms (*i.e.*, greater than 50%) and relative to the statistics for programs targeted to other rate class groups;

3. Whether the tariff charges per kWh for Residential and Small C&I customer classes are similar in magnitude, or an adequate explanation for any major variation is provided by the Company;
4. Whether the benefit-cost ratios, measured both with and without a NTG adjustment, for programs targeted at Small C&I customers are similar or greater in magnitude than those targeted at other rate class groups.

The OSBA reserves the right to pursue additional issues as they may arise throughout the course of the proceeding.

V. DISCOVERY

The Company has agreed to shorten the time for discovery responses to ten days.

VI. SERVICE OF DOCUMENTS

The OSBA agrees to accept electronic delivery of documents on the due date as satisfying the in-hand requirement, *provided that such documents are followed by hard copy delivery to OSBA and to its witness identified above by first class mail.* Service by electronic mail *only* is not acceptable.

In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. The OSBA also requests that all parties serve an electronic copy of all interrogatory responses upon the OSBA and the OSBA witness identified above.

VII. SETTLEMENT

The OSBA is willing to enter into settlement discussions at the appropriate phase of this proceeding.

VIII. PROCEDURAL SCHEDULE

The OSBA will work with the ALJ and other parties to develop a mutually acceptable procedural schedule.

Respectfully submitted,


Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921

For:

John Evans
Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101

Dated: January 4, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of its Act 129 :
Phase III Energy Efficiency and : **Docket No. M-2015-2515642**
Conservation Plan :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (unless other noted below) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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DATE: January 4, 2016


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