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File #: 163427

January 4, 2016

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Dear Secretary Chiavetta:

Enclosed for filing is PPL Electric Utilities Corporation's Prehearing Conference Memorandum for the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "DR", with a long horizontal line extending to the right.

Devin Ryan

DTR/jl
Enclosures

cc: Honorable Susan D. Colwell
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

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Date: January 4, 2016



Devin F. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING CONFERENCE MEMORANDUM OF
PPL ELECTRIC UTILITIES CORPORATION**

TO ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:

Pursuant to 52 Pa. Code § 5.222(d) and the Prehearing Conference Order dated December 18, 2015, PPL Electric Utilities Corporation (“PPL Electric” or “Company”) hereby submits this Prehearing Conference Memorandum.

I. BACKGROUND

On November 30, 2015, PPL Electric filed the above-captioned Petition with the Pennsylvania Public Utility Commission (“Commission”). This filing was made pursuant to Act 129 of 2008 (“Act 129”), P.L. 1592, 66 Pa. C.S. §§ 2806.1 and 2806.2, the Commission’s Implementation Order entered on June 19, 2015,¹ and the Commission’s Clarification Order entered on August 20, 2015.²

In its Petition, PPL Electric requested Commission approval of PPL Electric’s Phase III (June 1, 2016 – May 31, 2021) Energy Efficiency and Conservation Plan (“Phase III EE&C Plan”). The Phase III EE&C Plan includes a broad portfolio of energy efficiency and demand response programs, conservation practices, and energy education initiatives. These integrated

¹ *Energy Efficiency and Conservation Program*, Docket No. M-2014-2424864 (Implementation Order Entered June 19, 2015) (“*Implementation Order*”).

² *Energy Efficiency and Conservation Program*, Docket No. M-2014-2424864 (Clarification Order Entered Aug. 20, 2015) (“*Clarification Order*”).

programs are designed to meet the goals established by Sections 2806.1 and 2806.2 of Act 129 and the Commission's *Implementation Order*.

On December 4, 2015, PPL Electric filed the written direct testimony of Peter Cleff, M. Hossein Haeri, and Bethany L. Johnson in support of its Phase III EE&C Plan.

On December 10, 2015, the Office of Consumer Advocate ("OCA") filed a Notice of Intervention and Public Statement.

On December 11, 2015, PPL Electric filed corrections to two of the tables presented in its Phase III EE&C Plan.

On December 12, 2015, a notice of PPL Electric's Phase III EE&C Plan filing was published in the *Pennsylvania Bulletin* providing that comments on the Phase III EE&C Plan are due by January 4, 2016.

On December 17, 2015, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") filed a Petition to Intervene.

Also on December 17, 2015, the Office of Small Business Advocate ("OSBA") filed a Notice of Intervention, Public Statement, and Notice of Appearance.

On December 18, 2015, a Prehearing Conference Order was issued, which directed the parties to file prehearing conference memoranda on or before 12:00 PM on January 4, 2016.

On December 21, 2015, the Sustainable Energy Fund of Central Eastern Pennsylvania ("SEF") filed a Petition to Intervene and a Notice of Appearance.

On December 22, 2015, the Commission on Economic Opportunity ("CEO") filed a Petition to Intervene.

On December 31, 2015, Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart") filed a Petition to Intervene.

II. SERVICE OF DOCUMENTS

PPL Electric's attorneys in this proceeding are Paul E. Russell, Esquire, Kimberly A. Klock, Esquire, David B. MacGregor, Esquire, and Devin T. Ryan, Esquire. PPL Electric requests that Devin T. Ryan be listed as the recipient for service. Mr. Ryan's contact information is provided below:

Devin T. Ryan (ID # 316602)
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PPL Electric also requests that Mr. Russell, Ms. Klock, and Mr. MacGregor be added to any informal e-mail distribution lists in this proceeding. Mr. Russell's e-mail address is perussell@pplweb.com, Ms. Klock's e-mail address is kklock@pplweb.com, and Mr. MacGregor's e-mail address is dmacgregor@postschell.com. In addition, PPL Electric agrees to receive service of documents electronically in this proceeding.

III. WITNESSES AND ISSUES

A list of witnesses and a description of testimony is provided below. The testimony and related exhibits fully support PPL Electric's proposed Phase III EE&C Plan and demonstrate that the Plan, including the proposed cost-recovery mechanism, is just, reasonable, and consistent with the requirements of Act 129, the *Implementation Order*, and the *Clarification Order*. PPL Electric reserves the right to call additional witnesses, as necessary, to address issues that may arise during the course of this proceeding.

<u>Witness</u>	<u>Statement</u>	<u>General Subject Matter</u>
Peter Cleff Manager-Energy Efficiency Evaluation & Performance PPL Electric Utilities Corporation 827 Hausman Road Allentown, PA 18104 484-634-3006	PPL Electric Statement No. 1	Overview of Filing; Summary of Phase III EE&C Plan and Objectives; Development of Phase III EE&C Plan; Overview of Phase III Programs; Meeting the Phase III Reduction Targets; Evaluating and Updating the Phase III EE&C Plan; Competitive Bidding
M. Hossein Haeri, PhD. Senior Vice President of Energy Sector The Cadmus Group 720 SW Washington Street Suite 400 Portland, OR 97205 503-467-7140	PPL Electric Statement No. 2	Technical Analyses and Quantitative Program and Portfolio Summaries; Total Resource Cost Test Calculations; Avoided Costs
Bethany L. Johnson Manager-Regulatory Operations PPL Electric Utilities Corporation Two North Ninth Street Allentown, PA 18101 610-774-7011	PPL Electric Statement No. 3	Calculation of Spending Cap; Cost-Recovery Mechanism

IV. PROCEDURAL SCHEDULE

PPL Electric has conferred with the parties in this proceeding on an appropriate procedural schedule. Accordingly, the Company proposes the following procedural schedule:

November 30, 2015	Plan Filed
December 12, 2015	Publication in the <i>Pennsylvania Bulletin</i>
January 4, 2016	Other Parties' Comments
January 5, 2016	Prehearing Conference/Initial Settlement Discussion

January 12, 2016	Other Parties' Direct Testimony
January 14, 2016	Settlement Discussion
January 25, 2016	Rebuttal Testimony
January 29, 2016	Hearing – Harrisburg, PA
February 15, 2016	Main Briefs
February 18, 2016	Reply Comments/Revised Plan
February 19, 2016	Certification of the Record
March 2016	Commission Order

The Company understands that OCA, OSBA, CAUSE-PA, and PP&L Industrial Customer Alliance (“PPLICA”) also agree with this procedural schedule.

V. DISCOVERY

Recognizing the expedited nature of this litigation, PPL Electric proposes the following modifications to the Commission’s procedural rules regarding discovery:

1. Answers to written interrogatories shall be served in-hand within 10 calendar days of service of the interrogatories.
2. Objections to interrogatories shall be communicated orally within three calendar days of service of the interrogatories. Unresolved objections shall be served in writing within five calendar days of service of the interrogatories.
3. Motions to dismiss objections and/or direct the answering of interrogatories shall be filed within three calendar days of service of the written objections.
4. Answers to motions to dismiss objections and/or direct the answering of interrogatories shall be filed within three calendar days of service of such motions.
5. Rulings on such motions shall be issued, if possible, within seven calendar days of the filing of the motions.
6. Requests for admissions will be deemed admitted unless answered within ten calendar days or objected to within five calendar days of service of the requests.
7. Any discovery served after 12:00 PM on a Friday will be deemed to have been served on the following business day.

8. All discovery due dates be “in-hand.” Electronic or fax service on the due date will satisfy the “in-hand” requirement, where such service is immediately followed by a hard copy sent by first-class mail.

In addition, PPL Electric is not aware of any outstanding discovery disputes and has already received discovery requests from OCA, OSBA, CAUSE-PA, CEO, and PPLICA. The Company is timely responding to these interrogatories pursuant to the discovery schedule set forth above in Section V. The Company is willing to work with the parties, through informal discovery, to expedite discovery.

VI. PUBLIC INPUT HEARINGS

PPL Electric is not aware of any substantial consumer interest with respect to this proceeding. PPL Electric does not propose that any public input hearings be held absent substantial public interest in this proceeding and specific requests for such hearings.

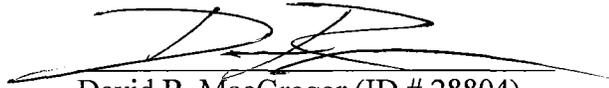
VII. PROTECTION OF CONFIDENTIAL INFORMATION

If necessary and should the case proceed to hearing, PPL Electric will timely submit an appropriate Motion for Protective Order.

VIII. SETTLEMENT

To date, no formal settlement discussions have been held. However, the procedural schedule contains dates for two settlement conferences, and PPL Electric will be working with the parties in an effort to resolve this proceeding through settlement.

Respectfully submitted,



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Of Counsel:

Post & Schell, P.C.

Date: January 4, 2016

Attorneys for PPL Electric Utilities Corporation