

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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February 5, 2018

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

Re: Pa. Public Utility Commission
v.
Petition of PPL Electric Utilities Corporation :
For Approval of Changes its Act 129 Phase III
Energy Efficiency and Conservation Plan
Docket No. M-2015-2515642

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Lauren M. Burge
Lauren M. Burge
Assistant Consumer Advocate
PA Attorney I.D. 311570
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Attachment

cc: Honorable Benjamin Myers, ALJ
Certificate of Service

*243703

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following 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 Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 5th day of February 2018.

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\s\ Lauren M. Burge

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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 December 8, 2017 Prehearing Conference Order issued in the above-captioned matter, the Office of Consumer Advocate (OCA) provides the following information:

I. INTRODUCTION

On June 6, 2017, PPL Electric Utilities Corporation (PPL or the Company) filed its Petition of PPL Electric Utilities Corporation for Approval of Changes to its Act 129 Phase III Energy Efficiency and Conservation Plan (Petition) with the Pennsylvania Public Utility Commission (Commission). In its Petition, PPL sought approval of two “major” modifications and eleven “minor” modifications to its Phase III Act 129 Energy Efficiency and Conservation Plan (Phase III EE&C Plan). Although PPL’s proposed changes included both major and minor changes, PPL requested that its Petition be reviewed under the procedural schedule established for changes that do not meet the minor change criteria (i.e. “major changes”). Petition at 1-2.

On July 6, 2017, the OCA and a number of other parties filed Comments regarding PPL’s Petition. On July 26, 2017, PPL and PPLICA filed Reply Comments. In an Opinion and Order entered on November 21, 2017, the Commission approved all but one of PPL’s proposed changes to its Act 129 Phase III Plan. The minor plan change that was not approved proposed to allow for

enhanced incentives for localized energy efficiency or demand reduction to be offered as a pilot under PPL's Appliance Recycling, Energy Efficient Home, Demand Response, and Nonresidential Energy Efficiency Programs. See Opinion and Order at 32-37. The Commission referred this proposed change to the Office of Administrative Law Judge for hearings and a recommended decision. Id. at 37.

PPL's Petition regarding this item was assigned to the Office of Administrative Law Judge and further assigned to Administrative Law Judge Benjamin J. Myers. A Prehearing Conference in this matter has been scheduled for February 7, 2018.

II. ISSUES

The proposed change to PPL's Act 129 Phase III Plan at issue here would allow for enhanced incentives for localized energy efficiency or demand reduction to be offered as a pilot under PPL's Appliance Recycling, Energy Efficient Home, Demand Response, and Nonresidential Energy Efficiency Programs. As discussed in the OCA's July 6, 2017 Comments, the OCA's initial concerns with this proposal include the following:

- PPL has not provided adequate details such as what enhanced incentives would be offered or how they Company would identify areas that would receive enhanced incentives.
- The proposal may create confusion among customers as to the incentives available, or may create a sense that some customers are favored and receive greater benefits than others.

Additionally, the OCA anticipates that other issues may arise as the parties investigate PPL's proposal. Accordingly, the OCA specifically reserves the right to raise additional issues as this matter proceeds.

III. WITNESSES

The OCA has not yet determined whether the testimony of an expert witness is necessary in this matter. The OCA specifically reserves the right to call a witness or witnesses, as necessary. If the OCA determines that a witness is necessary for any portion of its case, the OCA will promptly notify ALJ Myers and all parties of record.

IV. SERVICE ON THE OCA

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

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V. PROPOSED SCHEDULE

The OCA will work with the parties to develop a mutually agreeable schedule in this proceeding.

VI. SETTLEMENT

The OCA will fully participate in settlement discussions with the parties at the appropriate time during this proceeding.

Respectfully Submitted,

/s/ Lauren M. Burge
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Dated: February 5, 2018

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