

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of a Rate Mitigation Plan : P-2009-2091280

**PREHEARING CONFERENCE MEMORANDUM OF PETITIONER
CITIZENS FOR PENNSYLVANIA'S FUTURE**

Petitioner Citizens for Pennsylvania's Future ("PennFuture") hereby files this Prehearing Memorandum as required by the March 17, 2009 Prehearing Order issued by Administrative Law Judge David A. Salapa.

1. Service List

PennFuture will be represented in this proceeding by John K. Baillie. Service may be made upon:

John K. Baillie, Esq.
Citizens for Pennsylvania's Future
425 Sixth Avenue, Suite 2770
Pittsburgh, Pennsylvania 15219
Phone: 412-258-6684
Fax: 412-258-6685
baillie@pennfuture.org

2. Settlement

PennFuture has not discussed settlement with any other party. PennFuture will participate in settlement talks with other parties, and expects that the issues that it intends to address are likely to be resolved by settlement prior to any hearing.

3. Proposed Plan and Schedule of Discovery

PennFuture supports PPL Electric Utilities Corporation's ("PPL Electric") request that consideration of its Petition in this Proceeding be expedited. PennFuture will cooperate with other parties to agree on an acceptable discovery schedule. PennFuture does not anticipate that it will serve discovery requests on any other party.

4. Other Proposed Discovery Orders

PennFuture does not propose any other discovery orders.

5. Proposed Schedule for Submitting Testimony, Conducting the Hearing, and Submitting Briefs

PennFuture will cooperate with other parties to arrive at an acceptable schedule for submitting testimony, conducting the in-person hearing, and submitting briefs.

6. Witnesses and Testimony

PennFuture has currently identified the following witness:

Thomas J. Tuffey, Ph.D.
The Center for Energy, Enterprise, and the Environment
212 West Gay Street
West Chester, PA 19380-2942
(610) 696-8061

Possible topics for Mr. Tuffey's testimony include: identifying the economic and environmental benefits that are likely to accrue once rate caps on electric service expire, including the entry of new suppliers and technologies into the market, increased conservation and reliance on renewable energy sources, and decreased production of greenhouse gases and other pollutants.

b. PennFuture reserves the right to identify other expert and non-expert witnesses to provide testimony on these and other issues identified during the course of this proceeding.

6. List of Issues and Statement of PennFuture's Position

a. To the extent it offers residential and small business customers of up to 25 kW in maximum registered peak load the opportunity to prepay or defer some portion of the rate increase that is expected to occur after December 31, 2009, is PPL Electric's Rate Mitigation Plan (the "RMP") in the public interest?

ANSWER: Yes.

b. Does the RMP's failure to extend to all customers having up to 25kW maximum registered peak load render the RMP legally insufficient?

ANSWER: This question requires further analysis.

c. PennFuture reserves its right to raise additional issues that it may identify during the course of this proceeding.

7. Evidence to be Presented

a. The testimony of Thomas J. Tuffey.

b. PennFuture reserves the right to identify other expert and non-expert witnesses to provide testimony on these and other issues identified during the course of this proceeding.

Respectfully submitted,

DATE: March 30, 2009

/s/

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