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March 30, 2009

VIA ELECTRONIC FILING

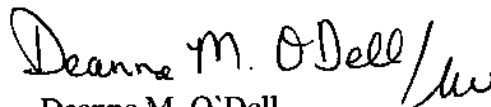
James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
2nd Fl., 400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation for Approval
of a Rate Mitigation Plan
Docket No. P-2009-2091280

Dear Secretary McNulty:

On behalf of the Retail Energy Supply Association enclosed for filing please find its original Prehearing Memorandum along with the electronic filing confirmation page with regard to the above-referenced matter. Copies have been served in accordance with the attached Certificate of Service.

Sincerely,


Deanne M. O'Dell
For WolfBlock LLP

DMO/lww
Enclosure

cc: Hon. Veronica Smith, w/enc.
Cert. of Service w/enc.

HAR:89315.1/MID051-249428

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the Retail Energy Supply Association's Prehearing Memorandum upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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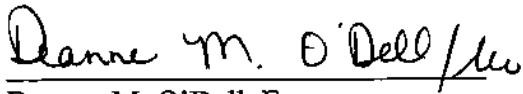
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Deanne M. O'Dell, Esq.

Date: March 30, 2009

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PPL ELECTRIC UTILITIES CORPORATION FOR APPROVAL OF A RATE MITIGATION PLAN :
: **Docket No. P-2009-2091280**
:
:

**PREHEARING MEMORANDUM OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to Section 333 of the Public Utility Code, 66 Pa. C.S. § 333, Section 5.222 of the Commission's regulations, 52 Pa. Code § 5.222, and in response to the prehearing conference notice issued March 17, 2009, the Retail Energy Supply Association ("RESA") submits this Prehearing Memorandum.

HISTORY OF PROCEEDING

On February 19, 2009, PPL Electric Utilities Corporation ("PPL") filed the above-captioned petition for approval of a rate mitigation plan ("RMP") for its residential and small commercial and industrial ("Small C&I") customers. PPL proposes to enable eligible customers to voluntarily elect to defer a portion of PPL's January 1, 2010 forecasted rate increase. Deferred amounts, plus carrying charges, would be recovered by the end of 2012.

RESA is a non-profit organization and trade association of retail energy suppliers who share the common vision that competitive retail energy markets deliver more efficient, customer-oriented outcomes than regulated utility structures.¹ RESA represents the interests of its members in the Mid-Atlantic, New England and Great Lakes regions in advocating for the

¹ RESA's members include Commerce Energy, Inc; Consolidated Edison Solutions, Inc; Direct Energy Services, LLC; Gexa Energy; Hess Corporation; Integrys Energy Services, Inc.; Liberty Power Corp.; Reliant Energy Retail Services, LLC; Sempra Energy Solutions; Strategic Energy, LLC; SUEZ Energy Resources NA, Inc. and US Energy Savings Corp. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

development of robust and sustainable competitive retail electric markets. RESA members include several companies that are licensed electric generation suppliers ("EGSs") in the Commonwealth of Pennsylvania and sell, or are authorized to sell, electric energy in PPL's service territory.

SERVICE LIST

RESA's attorneys in this matter are:

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ISSUES

RESA's primary concern in this matter is that the plan be competitively neutral and that customers are fully informed of their eligibility to participate in the program whether they desire to take PPL's default service or service from a competitive supplier. RESA is not opposed to the "opt-out" structure of the plan but also does not oppose an "opt-in" plan. RESA is also concerned that PPL is proposing only one (1) of a number of rate mitigation measures identified in the Commission's Default Service Policy Statement. RESA believes that the development of a robust competitive market is the most effective rate mitigation strategy as it will empower customers with more control over rising energy costs. In this regard, RESA believes that a rate mitigation strategy for the PPL service territory should also give due consideration to retail market development policies recommended by the Commission in its Default Service Policy Statement, including consideration of a purchase of receivables and customer referral programs.

RESA reserves the right to address other issues raised by other parties as they may affect RESA's interests in this matter.

WITNESS/SUBJECT OF TESTIMONY

RESA does not anticipate presenting a witness in this proceeding, but intends to participate otherwise. RESA will inform the ALJ and the parties as soon as possible if RESA decides to present a witness.

PROPOSED LITIGATION AND DISCOVERY SCHEDULE

RESA has no objection to modifications of the Commission's discovery rules consistent with the changes that have been adopted in other Commission proceedings. RESA is also amenable to a reasonable litigation schedule that accommodates the interests of the parties, including expediting the matter through written stipulations in lieu of hearings to address factual matters.

SETTLEMENT

RESA is willing to engage in settlement discussions.

Respectfully submitted,



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Dated: March 30, 2009

Attorneys for the Retail Energy Supply
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