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File #: 2507/140056

October 14, 2009

VIA E-FILE & BY HAND

James J. McNulty  
Secretary  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
PO Box 3265  
Harrisburg, PA 17105-3265

**RE: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation**  
**Docket No. R-2009-2122718**

Dear Secretary McNulty:

Enclosed for filing please find the Prehearing Memorandum of PPL Electric Utilities Corporation in 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 read 'Anthony D. Kanagy', is written over a large, stylized circular flourish.

Anthony D. Kanagy

ADK/skr  
Enclosures  
cc: Honorable David A. Salapa  
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 AND FIRST CLASS MAIL**

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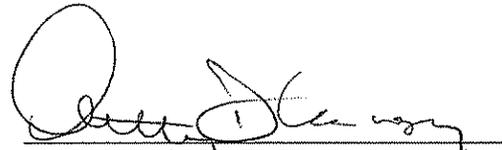
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Date: October 14, 2009



Anthony D. Kanagy



NewEnergy, Inc. and Constellation Energy Commodities Group, Inc. (collectively “Constellation”) have filed Petitions to Intervene. PPL Electric does not object to these parties’ interventions to raise relevant issues related to their interests in this proceeding.

## II. COUNSEL

PPL Electric’s counsel in this proceeding are Paul E. Russell, Esquire, David B. MacGregor, Esquire, and Anthony D. Kanagy, Esquire. Pursuant to Paragraph 2 of the ALJ’s Prehearing Conference Order, PPL Electric requests that Anthony D. Kanagy be listed as the recipient for service. Mr. Kanagy’s contact information is provided below:

Anthony D. Kanagy (ID # 85522)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
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E-mail: [akanagy@postschell.com](mailto:akanagy@postschell.com)

PPL Electric also requests that Mr. Russell 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](mailto:perussell@pplweb.com), and Mr. MacGregor’s e-mail address is [dmacgregor@postschell.com](mailto:dmacgregor@postschell.com).

## III. PROCEDURAL SCHEDULE

PPL Electric proposes the following schedule for this proceeding:

Company direct testimony: October 16, 2009

Other parties direct testimony: October 30, 2009

Public Input Hearing: During the week of November 2-6, 2009

Rebuttal outlines: November 5, 2009

Hearings: November 9, 2009 (oral rebuttal, surrebuttal and rejoinder if any presented at hearings)

Main Briefs: November 18, 2009

Reply Briefs: November 24, 2009

Mr. Epstein and SEF have requested that a public input hearing be held in this proceeding. Pursuant to the Settlement of the Company's default service at Docket No. P-2008-2060309, the Company supports this request. The Company will continue to work with the parties to establish a specific date for the proposed public input hearing.

**IV. WITNESSES AND ISSUES**

At this time, PPL Electric proposes to call Douglas A. Krall and Joseph M. Kleha as witnesses in this proceeding. The contact information for these witnesses is provided below:

Douglas A. Krall  
Manager – Regulatory Strategy  
PPL Electric Utilities Corporation  
Two North Ninth Street  
Allentown, PA 18101-1179  
Tel: (610) 774-5736

Joseph M. Kleha  
Manager – Regulatory Compliance and Rates  
PPL Electric Utilities Corporation  
Two North Ninth Street  
Allentown, PA 18101-1179  
Tel: (610) 774-4486

The Company has set forth its position regarding the issues in this proceeding in its Statement of Reasons that accompanied Supplement No. 71. PPL may call additional witnesses in response to issues raised by other parties.

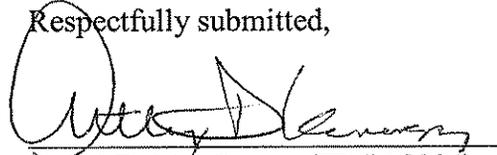
**V. DISCOVERY**

PPL Electric will work with the parties to adopt discovery rules for this proceeding. PPL Electric is willing to participate in informal discovery with the parties.

**VI. SETTLEMENT**

Pursuant to Paragraph 3(b) of the Prehearing Order, PPL Electric is interested in pursuing settlement negotiations with the parties to attempt to resolve all or some of the issues raised in this proceeding.

Respectfully submitted,



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Of Counsel:

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Date: October 14, 2009

Attorneys for PPL Electric Utilities Corporation