

**BEFORE THE
Pennsylvania Public Utility Commission**

**Re: Pennsylvania Public Utility Commission
v. PPL Electric Utilities Corporation;
Docket No. R-2010-2161694**

Prehearing Memorandum

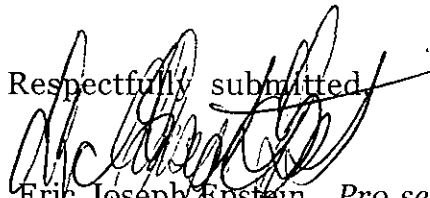
May 19, 2010

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Dear Secretary Chiavetta:

Eric Joseph Epstein ("Epstein" or "Mr. Epstein") hereby submits an original and three (3) copies of his Prehearing Memorandum in the above-captioned proceeding. Mr. Epstein intends to fully participate in this proceeding as an "active" party. Mr. Epstein also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

Respectfully submitted,


Eric Joseph Epstein, *Pro se*
4100 Hillsdale Road
Harrisburg, PA 17112
(717)-541-1101 Phone
lechambon@comcast.net

RECEIVED
2010 MAY 21 AM 9:45
PA P.U.C.
SECRETARY'S BUREAU

RECEIVED
2010 MAY 21 AM 9:44
P.U.C. BUREAU
SECRETARY'S OFFICE

**BEFORE THE
Pennsylvania Public Utility Commission**

**Re: Pennsylvania Public Utility Commission
v. PPL Electric Utilities Corporation;
Docket No. R-2010-2161694**

Prehearing Memorandum

I. History of the Proceeding

1) On March 1, 2010, PPL Electric Utilities (“PPL” or “the Company”) announced it will seek a rate increase for distribution rates with the Pennsylvania Public Utility Commission (“PUC” or “Commission”).

If the PUC approves the rate increase, the new rates would take effect in January, 2011.

2) On March 18, 2010, the Northeast Delegation of the Pennsylvania House of Representatives asked PPL to reconsider its plans to seek a distribution rate increase.

3) On March 31, 2010, PPL Electric Utilities requested a 5.3% rate increase that could cost residential customers an additional \$7.41 per month.

4) On April 17, 2010, Eric Joseph Epstein's (“Mr. Epstein” or “Epstein”) filed a Complaint and a Petition to Intervene in the Above-Referenced Proceeding. This Petition was filed Pursuant to Commission Regulations, 52 Pennsylvania Code § Sections 5.71-5.74.

5) On May 17, 2010, Mr. Epstein received a Prehearing Order from the the Honorable Susan D. Colwell Administrative Law Judge (“ALJ”) with the Pennsylvania Public Utility Commission.

6) The Administrative Law Judge Colwell ordered an initial Prehearing conference for Wednesday, May 26, 2010 at 10:00 pm in Hearing Room #2, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA.

II. Statement of Issues

7) Mr. Epstein is a residential customer of PPL Electric Utilities Corporation.

8) PPL's proposal to recover "indirect and direct costs" will impact Mr. Epstein's rates.

9) Eric Joseph Epstein is presently analyzing PPL's assumptions, estimates, projections, methodologies, undocumented statements, citations, predictions, and conclusions associated with the Company's Filing.

10) Mr. Epstein's initial evaluation of PPL's request found numerous errors, inconsistencies, miscalculations, unproven assumptions and unsubstantiated statements, and his preliminary review of the Company's filing indicates the need for a Commission investigation into at least the following issues:

- a) The amount of the requested rate increase is just and appropriate;
- b) The expenses claimed by PPL were prudently incurred;
- c) PPL's proposed rate structure and rate design are appropriate;
- d) The allocation of the proposed distribution rate increase between and among customer classes is just, reasonable and nondiscriminatory;
- e) The rate of return on equity proposed by PPL, and other aspects of the Company's proposal result in a fair rate of return;
- f) PPL's cost and quality of service is accurate, legitimate, and appropriately allocated;
- g) Appropriateness and accuracy of PPL's accounts, depreciation accruals and accrued depreciations and annual amortization rates;

h) Reconciliation of PPL's accounts, depreciation accruals and accrued deprecations and annual amortization rates to ensure consistency the Company's Revenue Neutral Reconciliation Tax Assessments in terms of accounts, depreciation accruals and accrued deprecations and annual amortization rates;

i) Value of building permits and value of replacement parts; and,

j) Cost sharing, responsibilities, liabilities and cost burdens associated with environmental remediation.

11) Mr. Epstein reserves the right to raise any issues or questions relating to any discrepancies or errors in the Above-Referenced proceeding.

12) Eric Joseph Epstein anticipates pursuing these issues during this proceeding, and reserves the right to address other issues of concern, and to respond to issues raised by other parties.

III. Proposed Witnesses

13) Mr. Epstein respectfully reserves the right to modify or supplement his witness list during the course of this proceeding. In the event that Eric Joseph Epstein decides to modify or supplement his witness list, Epstein will inform the parties and the Administrative Law Judge.

IV. Proposed Schedule & Discovery Rules

14) Mr. Epstein will fully cooperate with the Court and the Parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any ALJ directives.

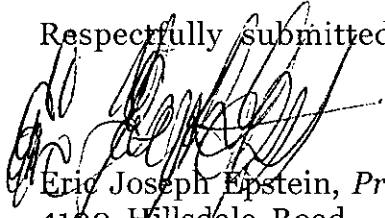
V. Public Input Hearing

15) Mr. Epstein will attend and participate in Public Input Hearings.

VI. Settlement Discussions

16) Eric Joseph Epstein is willing to participate in Settlement discussions and negotiations with the other parties to resolve all outstanding issues in this proceeding.

Respectfully submitted,



Eric Joseph Epstein, *Pro se*
4100 Hillsdale Road
Harrisburg, PA 17112

Dated: May 19, 2010

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the active participants named below by US mail or hand delivery or electronic transmission in accordance with the requirements of Section 1.54.

The Honorable Susan D. Colwell
Administrative Law Judge
Commonwealth Keystone Building
400 North Street
Harrisburg, Pa 17120

David M. Kleppinger, Esquire
Pamela C. Polacek, Esquire
Shelby Linton-Keddie, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

David MacGregor, Esquire
Michael W. Hasell, Esquire
John H. Isom, Esquire
PPL c/o
Post & Schell
17 North Second St., Floor 12
Harrisburg, Pa 17101-1601

Paul E. Russell, Esquire
PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101-1179

Aron J. Beatty, Esquire
Tanya McCloskey, Esquire
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1921

Todd Stewart, Esquire
Dominion Retail
Hawke, McKeon & Sniscak
100 N. Tenth Street
P.O. Box 1778
Harrisburg, Pa 17101

Richard A. Kanaskie, Esquire
Laurence T. Barth, Esquire
PA Public Utility Commission
Office of Trial Staff
P.O. Box 32
Harrisburg, PA 17105-3265

Kenneth L. Mickens, Esquire
316 Yorkshire Drive
Harrisburg, PA 17111

RECEIVED
2010 MAY 21 AM 9:45
PA.P.U.C.
SECRETARY'S BUREAU

Joseph J. Vullo, Esquire
CEO
1460 Wyoming Avenue
Forty Fort, PA 18704

Steven Gray, Esquire
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Scott J. Rubin
IBEW
333 Oak Lane
Bloomsburg, PA 17815

Gary A. Jeffries, Esquire
Dominion Retail
501 Martindale Street, Ste. 400
Pittsburgh, PA 15212

May 19, 2010