



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Fax
www.postschell.com

Andrew S. Tubbs

atubbs@postschell.com
717-612-6057 Direct
717-731-1985 Fax
File #: 2507/140070

August 17, 2010

BY HAND

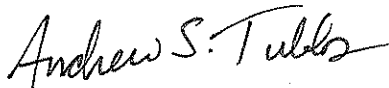
Honorable Susan D. Colwell
Administrative Law Judge
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105

RE: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period January 1, 2011 Through May 31, 2013 (Petition of PPL Electric Utilities for Approval to Modify its Procurement of Solar Alternative Energy Credits) - Docket No. P-2008-2060309

Dear Administrative Law Judge Colwell:

Enclosed is the original Prehearing Memorandum of PPL Electric Utilities Corporation in the above-referenced proceeding. As indicated on the certificate of service, copies have been provided to the persons in the manner indicated.

Respectfully Submitted,


Andrew S. Tubbs

AST/jl

Enclosures

cc: Rosemary Chiavetta, Secretary (*via e-file*)
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

Erin L. Gannon
James A. Mullins
Aron J. Beatty
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
egannon@paoca.org
jmullins@paoca.org
abeatty@paoca.org

Allison Kaster
Office of Trial Staff
400 North Street, 2nd Floor West
P.O. Box 3265
Harrisburg, PA 17105-3265
akaster@state.pa.us

Steven C. Gray, Esquire
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
sgray@state.pa.us

Brian Knipe
Buchanan Ingersol & Rooney, PC
One South Market Square
213 Market Street, 3rd Floor
Harrisburg, PA 17101-2121
Brian.Knipe@bipc.com

Pamela C. Polacek
Shelby A. Linton-Keddie
McNees, Wallace & Nurick
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108-1166
ppolacek@mwn.com
skeddie@mwn.com

Craig R. Burgraff
Todd Stewart
Hawke, McKeon, Sniscak & Kennard, LLP
100 N. 10th Street
Harrisburg, PA 17101
crburgraff@hmslegal.com
tsstewart@hmslegal.com

Thomas T. Niesen
Charles E. Thomas, III
Thomas, Long, Niesen & Kennard
P.O. Box 9500
212 Locust Street, Suite 500
Harrisburg, PA 17108-9500
tniesen@thomaslonglaw.com
cet3@thomaslonglaw.com

Charles E. Thomas, Jr.
Jennifer M. Sultzaberger
Thomas, Long, Niesen & Kennard
P.O. Box 9500
212 Locust Street, Suite 500
Harrisburg, PA 17108-9500
cthomasjr@thomaslonglaw.com
jms@thomaslonglaw.com

Daniel Clearfield
Carl R. Shultz
Deanne O'Dell
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17108-1248
dclearfield@eckertseamans.com
cshultz@eckertseamans.com
dodell@eckertseamans.com

Eric J. Epstein
4100 Hillsdale Road
Harrisburg, PA 17112
ericepstein@comcast.net

Christopher A. Lewis
Christopher R. Sharp
Blank Rome LLP
One Logan Square
Philadelphia, PA 19103
Lewis@blankrome.com
Sharp@blankrome.com

Divesh Gupta
Constellation NewEnergy Inc.
Candler Bldg., 7th Floor
111 Market Place
Baltimore, MD 21202
divesh.gupta@Constellation.com

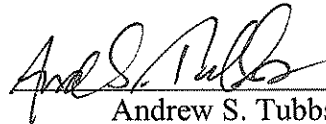
Craig A. Doll
P.O. Box 403
25 West Second Street
Hummelstown, PA 17036
CDoll76342@aol.com

Frank Richards
Richards Energy Group
781 S. Chiques Road
Manheim, PA 17545-9135
frichards@richardsenergy.com

Jesse A. Dillon
PPL EnergyPlus LLC
Two North Ninth Street
Allentown, PA 18101-1179
jadillon@pplweb.com

Michelle M. Skjoldal
Pepper Hamilton LLP
100 Market Street, Suite 200
P.O. Box 1181
Harrisburg, PA 17108-1181
skjoldalm@pepperlaw.com

Date: August 17, 2010



Andrew S. Tubbs

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of a Default Service Program :
and Procurement Plan for the Period January :
1, 2011 Through May 31, 2013 (**Petition of** : Docket No. P-2008-2060309
PPL Electric Utilities for Approval to :
Modify its Procurement of Solar :
Alternative Energy Credits) :

**PREHEARING MEMORANDUM OF
PPL ELECTRIC UTILITIES CORPORATION**

TO ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:

PPL Electric Utilities Corporation (“PPL Electric”) hereby submits this Prehearing Conference Memorandum in response to a Notice scheduling a Prehearing Conference for August 18, 2010.

I. BACKGROUND

On May 18, 2010, PPL Electric filed with the Pennsylvania Public Utility Commission (“Commission”) its Petition for Approval to Modify Its Procurement of Solar Alternative energy Credits Under the Default Service Procurement Plan (“Petition”). In the Petition, PPL Electric requests Commission approval to modify the Default Service Procurement Plan (“DSP Plan”) previously approved by the Commission on June 30, 2009 in the above-captioned proceeding, and to authorize a revised procedure for prospective acquisition of solar Tier I alternative energy credits (“SRECs”).

Specifically, PPL Electric requested that the Commission approve: (1) PPL Electric’s request to amend its current DSP Plan to permit it to procure a portion of its SRECs obligation over a long-term delivery period such that this portion will no longer be procured under its DSP Plan’s fixed-price load following contracts; (2) PPL Electric’s proposed Request for Proposals

Process and Rules: Solar Renewable Energy Credits for Compliance with Pennsylvania's Alternative Energy Portfolios Standards Act; (3) PPL Electric's proposed Solar Renewable Energy Credit Supply Master Agreement; and (4) PPL Electric's proposed revisions to its Generation Supply Charge-1 to provide for the proper treatment of all costs and credits associated with the procurement of SRECs pursuant to the RFP process described in the Petition. By its Petition, PPL Electric does not seek to alter or set aside any of the contracts it has previously entered into under its DSP Plan but instead seeks to implement an additional solicitation and procurement process for SRECs.

On June 7, 2010, the Office of Consumer Advocate, the Office of Small Business Advocate and the Sustainable Energy Fund of Central Eastern Pennsylvania filed Answers to the above-captioned Petition. In addition, the PP&L Industrial Customer Alliance, Exelon Generation Company, LLC and the Solar Alliance filed Petitions to Intervene.

On July 28, 2010, the Commission issued a Notice scheduling a Prehearing Conference on August 18, 2010.

II. COUNSEL

PPL Electric requests that all documents be served on:

Michael W. Hassell (ID # 34851)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6029
Fax: 717-731-1985
E-mail: mhassell@postschell.com

PPL Electric agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be

served upon Paul E. Russell at perussell@pplweb.com, Michael W. Hassell at mhassell@postschell.com, and Andrew S. Tubbs at atubbs@postschell.com.

III. DISCOVERY

PPL Electric does not propose any discovery rules that are different than those provided in the Commission’s regulations. PPL Electric is willing to participate in informal discovery with the other parties. PPL Electric believes that no special order with regard to discovery is required in this proceeding.

IV. PROCEDURAL SCHEDULE

PPL Electric proposes the following schedule for resolution of this proceeding, which has been agreed to by many of the parties:

Company’s Direct Testimony	September 15, 2010
Other Parties’ Direct Testimony	October 13, 2010
Rebuttal Testimony	October 27, 2010
Evidentiary Hearings	November 3 & 4, 2010
Main Briefs	November 16, 2010
Reply Briefs	November 23, 2010

V. WITNESSES AND ISSUES

PPL Electric presently intends to offer the following witnesses to testify in this proceeding on the following subject matters:

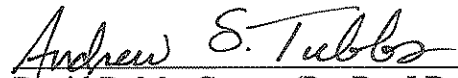
<u>Witness</u>	<u>Subject matter</u>
Douglas R. Stinner	PPL Electric’s current DSP Plan and the proposed SREC procurement
Joseph Cavicchi	Details relative to the competitive procurement program to procure SRECs

PPL Electric also reserves the right to call and present additional witnesses to address any issues that may arise during the course of the proceeding.

VI. SETTLEMENT

An initial settlement discussion has been held and PPL Electric is interested in pursuing settlement negotiations with the parties. PPL Electric will arrange additional settlement conferences with available parties in the near future.

Respectfully submitted,


David B. MacGregor (Pa. Bar I.D. #28804)
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
Voice: 215.587.1197
Fax: 215.320.4879
E-mail: dmacgregor@postschell.com

Paul E. Russell (Pa. Bar I.D. #21643)
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Voice: 610.774.4254
Fax: 610.774.6726
E-mail: perussell@pplweb.com

Michael W. Hassell (ID # 34851)
Andrew S. Tubbs (ID #80310)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Voice: 717.731.1970
Fax: 717.731.1985
E-mail: mhassell@postschell.com
E-mail: atubbs@postschell.com

Of Counsel:

Post & Schell, P.C.

Dated: August 17, 2010

Attorneys for PPL Electric Utilities Corporation