

**BEFORE THE
Pennsylvania Public Utility Commission**

Petition of PPL Electric Utilities Corporation
for Approval of a Default Service Program
Docket No. P-2008-2060309 and
Procurement Plan for the Period January 1, 2011
through May 31, 2013

Prehearing Memorandum

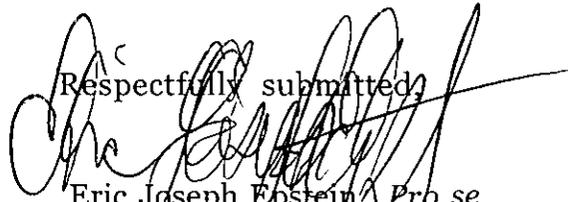
August 17, 2010

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

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I. History of the Proceeding

1) On June 30, 2009, the Pennsylvania Public Utility Commission (“the PUC” or “the Commission”) issued an Order approving the Settlement of PPL Electric's Default Service Procurement Plan.

2) The Order authorized Practices and Procedures for acquisition of solar Tier I alternative energy credits (“SRECs”).

3) As part of the settlement of PPL Electric's 2011-2013 POLR proceeding, the parties agreed that the details of the 50 MW 10-year unit entitlement RFP would be deferred to a collaborative and filed separately with the Commission for approval at a later date.

4) On May 18, 2010, PPL Electric Utilities Corporation (“PPL” or “the Company”) petitioned the PUC to to Modify Its Procurement of Solar Alternative Energy Credits Under the Default Service Procurement Plan.

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5) Numerous conference calls were convened between PPL and the Settlement parties.

6) The Administrative Law Judge Colwell ordered an initial Prehearing conference for Wednesday, August 18 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 and a Party to the POLR settlement.

8) Mr. Epstein has offered input and comments on the following issues regarding PPL Electric's 10-year unit entitlement RFP stemming from PPL Electric's 2011-2013 DSP Settlement:

- a. Unit Entitlement vs. Unit Contingent.
- b. RFP for renewable energy facilities.
- c. Size and make up of 50 MW block.
- d. Variable and reliable power contributions.
- e. Risk assignment for replacement energy.

III. Proposed Witnesses

9) 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

10) 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.

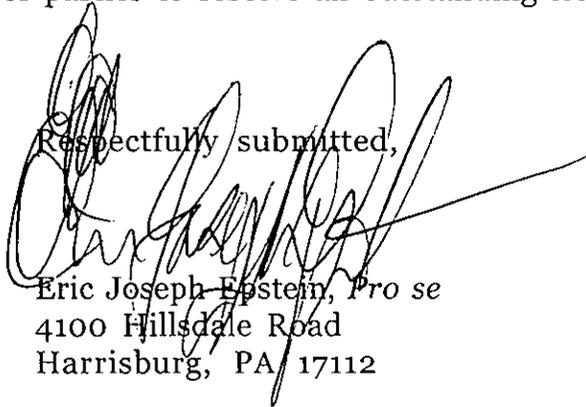
V. Public Input Hearing

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

VI. Settlement Discussions

12) 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,

A large, stylized handwritten signature in black ink, appearing to read 'Eric Joseph Epstein', is written over the typed name and address below.

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

August 17, 2010

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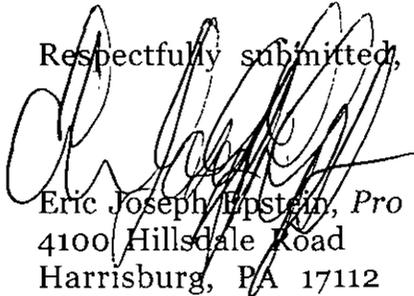
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Respectfully submitted,



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

August 17, 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

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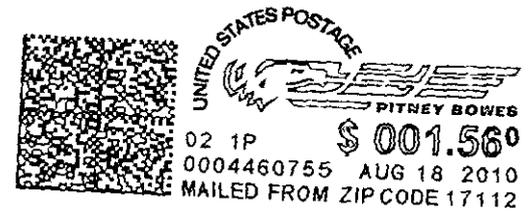
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