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File #: 2507/140074

September 9, 2010

BY HAND

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Tom Harrison v. PPL Electric Utilities Corporation
Docket No. C-2010-2181518

Dear Secretary Chiavetta:

Enclosed is the original Prehearing Memorandum of PPL Electric Utilities Corporation in the above-referenced proceeding.

As indicated by the certificate of service, a copy of the Prehearing Memorandum has been provide to Mr. Harrison by First Class Mail.

Respectfully Submitted,

Christopher T. Wright

CTW/skr

Enclosures

cc: Honorable Kandace F. Melillo
Certificate of Service

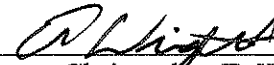
CERTIFICATE OF SERVICE

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 FIRST CLASS MAIL

Tom Harrison
14 Creekside Drive
Millersville, PA 17551

Date: September 9, 2010



Christopher T. Wright

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Tom Harrison,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2010-2181518
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**PREHEARING CONFERENCE MEMORANDUM OF
PPL ELECTRIC UTILITIES COMPANY**

TO ADMINISTRATIVE LAW JUDGE KANDACE F. MELILLO:

PPL Electric Utilities Company (“PPL Electric” or the “Company”), by and through its attorneys, Post & Schell, P.C., hereby files this Prehearing Memorandum in the above-captioned matter in response to the Prehearing Conference Order issued by Administrative Law Judge Kandace F. Melillo (the “ALJ”) on August 12, 2010, and states as follows:

I. SERVICE OF DOCUMENTS

1. PPL Electric requests that all documents be served on:

John H. Isom, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101
Phone: 717-612-6032
Fax: 717-731-1985
E-mail: jisom@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 Christopher T. Wright at cwright@postschell.com.

2. PPL Electric's attorneys are authorized to accept service on behalf of the Company in this proceeding. PPL Electric requests that the Pennsylvania Public Utility Commission ("Commission") and all parties of record serve copies of all discovery requests and answers, correspondence, Commission Orders, and any other documents issued in this proceeding on its attorneys in Harrisburg, Pennsylvania.

II. PROCEDURAL HISTORY

3. On June 14, 2010, the Complaint was filed by Tom Harrison at Docket No. C-2010-2181518.

4. On June 29, 2010, PPL Electric filed Preliminary Objections to the Complaint.

5. On July 29, 2010, PPL Electric served the Interrogatories and Requests for Production of Documents Propounded by PPL Electric on Tom Harrison – Set I.

6. On August 4, 2010, the ALJ issued an Order denying PPL Electric's Preliminary Objections, and directing PPL Electric to file an Answer to the Complaint.

7. On August 12, 2010, the ALJ issued a Prehearing Conference Order, scheduling an Initial In-Person Prehearing Conference in the above-captioned matter on September 14, 2010, in Harrisburg, Pennsylvania. The Prehearing Conference Order further directed the Parties to file and serve prehearing conference memoranda on or before September 9, 2010.

8. On August 25, 2010, PPL Electric filed its Answer to the Complaint in this proceeding.

III. WITNESSES AND ISSUES

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

<u>Witnesses</u>	<u>Subjects</u>
1. Timothy Dahl PPL Electric Utilities Corporation Contact Center 827 Hausman Road Allentown, PA 18104 Tel: 484-634-3297	Explain PPL Electric's Low Income Usage Reduction Program, also know as the Winter Relief Assistance Program ("WRAP").

10. PPL Electric is unable to identify any additional issues and/or witnesses at this time because Mr. Harrison has not responded to the Company's discovery requests.

11. PPL Electric reserves the right to present testimony on additional issues and subject matters that may arise during the course of the proceeding.

IV. DISCOVERY

12. To date, the Company has not received any discovery requests.

13. On July 29, 2010, PPL Electric served the Interrogatories and Requests for Production of Documents Propounded by PPL Electric on Tom Harrison – Set I. Mr. Harrison has not objected to the PPL Electric Interrogatories. Answers to the PPL Electric Interrogatories were originally due on or before August 23, 2010.

14. On August 19, 2010, counsel for the Company contacted Mr. Harrison and agreed to extend the discovery response period until August 26, 2010. To date, PPL Electric has not received answers to the PPL Electric Interrogatories. Answers to these discovery requests are now outstanding and delinquent. In order to avoid the necessity of a motion to compel, PPL Electric is willing to further discuss this matter at the Prehearing Conference.

15. The Company does not propose any special orders regarding discovery.

V. LITIGATION SCHEDULE


16. PPL Electric believes that it is inappropriate for a litigation schedule to be established in this proceeding until Mr. Harrison has fully answered PPL Electric's outstanding discovery requests.

VI. SETTLEMENT DISCUSSIONS

17. PPL Electric has contacted Mr. Harrison to discuss the issues raised in the Complaint but, to date, has been unable to reach any agreement with Mr. Harrison. PPL Electric remains open and available for settlement discussions with Mr. Harrison.

Respectfully submitted,

Paul E. Russell (Pa. Bar I.D. #21643)
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Dated: September 9, 2010

Attorneys for PPL Electric Utilities Corporation