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File #: 2507/140074

April 13, 2011

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: PPL Industrial Customer Alliance v. PPL Electric Utilities Corporation**  
**Docket No. C-2010-2153656**

Dear Secretary Chiavetta:

Attached please find the Prehearing Conference Memorandum of PPL Electric Utilities Company for the above-referenced proceeding. Copies have been provided as indicated on the certificate of service.

Respectfully Submitted,

Anthony D. Kanagy

ADK/skr

Enclosures

cc: Honorable David A. Salapa  
Certificate of Service


**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have 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 EMAIL AND FIRST CLASS MAIL**

Pamela C. Polacek  
Shelby Linton-Keddie  
McNees, Wallace & Nurick  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108-1166

Date: April 13, 2011



Anthony D. Kanagy

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Industrial Customer Alliance,	:	
Complainant,	:	
	:	Docket No. C-2010-2153656
v.	:	
	:	
PPL Electric Utilities Corporation,	:	
Respondent	:	

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

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**TO ADMINISTRATIVE LAW JUDGE DAVID A. SALAPA:**

Pursuant to 52 Pa. Code § 5.224(c) and Administrative Law Judge David A. Salapa's (the "ALJ") Prehearing Conference Order dated April 8, 2011, PPL Electric Utilities Company ("PPL Electric" or the "Company") hereby files this Prehearing Conference Memorandum in the above-captioned matter, and states as follows:

**I. SERVICE OF DOCUMENTS**

1. Pursuant to Paragraph 2 of the Prehearing Conference Order, PPL Electric requests that all documents be served on:

Anthony D. Kanagy  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: 717-612-6034  
Fax: 717-731-1985  
E-mail: akanagy@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:

David B. MacGregor at [dmacgregor@postschell.com](mailto:dmacgregor@postschell.com) and Paul E. Russell at [perussell@pplweb.com](mailto:perussell@pplweb.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 November 3, 2009, PPL Electric filed with the Commission, at Docket No. M-2009-2139375, its proposed reconciliation of the 2009 Transmission Service Charge ("2009 TSC") and its preliminary calculation of the proposed 2010 Transmission Service Charge ("2010 TSC") for the for the application period January 1, 2010 through December 31, 2010.

4. On December 1, 2009, PPL Electric filed with the Commission its final calculation of the proposed 2010 TSC, which subsequently was updated on December 11, 2009.

5. Pursuant to a December 17, 2009 Secretarial Letter, the Commission approved the reconciliation of the 2009 TSC, and approved the proposed 2010 TSC for the for the application period January 1, 2010 through December 31, 2010.

6. On January 1, 2010, the 2010 TSC rates became effective.

7. On January 22, 2010, PPL Electric was served with a Formal Complaint filed by the PPL Industrial Customer Alliance ("PPLICA") at Docket No. C-2010-2153656. In its Complaint, PPLICA argued that PPL Electric violated its tariff by not making an interim TSC filing in 2009.

8. On February 1, 2010, PPL Electric filed an Answer to PPLICA's Formal Complaint. In its Answer, PPL Electric denied that it was required to submit an interim filing

and also explained that, if it had made an interim TSC filing, there would only have been a limited time to reduce the TSC overcollection.

9. On March 3, 2010, a Hearing Notice was issued in the above-referenced matter which scheduled a Hearing for April 15, 2011 at 10:00 a.m. before the ALJ. On April 4, 2011, the Commission issued a Corrected Hearing Notice changing the Hearing to a Prehearing Conference.

10. On April 8, 2011, the ALJ issued a Prehearing Conference Order directing parties to file prehearing memoranda on or before April 13, 2011.

### **III. WITNESSES AND ISSUES**

11. If this matter proceeds to hearings, PPL Electric will offer testimony from the following witness on the following subject matters:

<b><u>Witness</u></b>	<b><u>Subjects</u></b>
Joseph M. Kleha, Manager-Regulatory Compliance and Rates PPL Electric Utilities Corporation Two North Ninth Street Allentown, PA 18101 Phone: 610.774.4486	<ul style="list-style-type: none"><li>- Explain the reconciliation of PPL Electric's 2009 TSC.</li><li>- Explain the calculation of PPL Electric's 2010 TSC and why the rate is just and reasonable.</li><li>- Respond to other issues identified by PPLICA.</li></ul>

12. PPL Electric reserves the right to present testimony on additional issues and subject matters that may arise during the course of the proceeding. PPL Electric further reserves the right to call additional witnesses, if necessary, in response to issues raised by PPLICA in this proceeding.

### **IV. DISCOVERY**

13. To date, the Company has not received any formal discovery requests, but is working informally with PPLICA to answer certain questions related to this proceeding.

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

**V. LITIGATION SCHEDULE**

15. PPL Electric proposes the following litigation schedule for this proceeding. It is PPL Electric's understanding that PPLICA agrees with this schedule.

PPLICA's Direct Testimony	June 20, 2011
Rebuttal Testimony	July 20, 2011
Surrebuttal Testimony	August 5, 2011
Evidentiary Hearings (including rejoinder testimony)	August 15, 2011
Main Briefs	September 8, 2011
Reply Briefs	September 22, 2011

**VI. SETTLEMENT**

16. PPL Electric and PPLICA currently are exploring the possibility of settling this proceeding, and PPL Electric will be open and available for settlement discussions throughout the course of this proceeding.

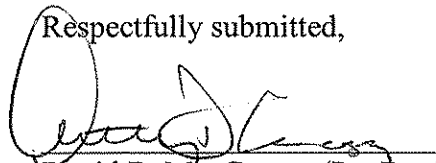
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Of Counsel:

Post & Schell, P.C.

Dated: April 13, 2011

Respectfully submitted,



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