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May 11, 2011

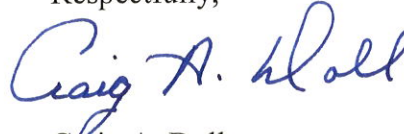
Honorable Susan D. Colwell
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corp.
Commission Docket No. R-2010-2161694 (Remand)

Dear ALJ Colwell:

Enclosed please find a copy of the Prehearing Memo of Richards Energy Group, Inc. in the above captioned proceeding. A copy of this document has been served upon those parties set forth in the accompanying Certificate of Service. If you have any questions, please feel free to contact me. Thank you for your cooperation.

Respectfully,



Craig A. Doll

Enclosure

cc: Per Certificate of Service
F. Richards

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, *et al.*

v.

R-2010-2161694

PPL Electric Utilities Corporation

**PREHEARING MEMORANDUM
OF
RICHARDS ENERGY GROUP, INC.**

TO THE HONORABLE SUSAN D. COLWELL:

In accordance with Your Honor's Prehearing Conference Order issued April 28, 2011, Richards Energy Group, Inc. ("Richards"), a participant in the underlying rate proceeding which gave rise to this remand, submits this Prehearing Memorandum .

Background

By Order entered April 27, 2011, the Commission granted a Petition for Reconsideration filed by the PP&L Industrial Customer Alliance and remanded certain issues to the Office of Administrative Law Judge for resolution. Pursuant to Your Honor's Prehearing Conference Order, parties were requested to file Prehearing Memoranda by May 11, 2011. This Prehearing Memorandum of Richards Energy Group is in response to the Order.

Service List Entry

Richards is being represented in this proceeding by Craig A. Doll, Esquire. Formal service is to be made upon:

Craig A. Doll, Esquire
25 West Second Street

P.O. Box 403
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To the extent possible, Richards would request that all electronically served documents also be served upon Mr. Frank Richards at frichards@richardsenergy.com.

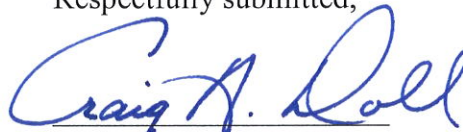
Scheduling

Richards is prepared to discuss and cooperate with the other parties and Your Honor to develop an appropriate schedule.

Witnesses, Issues and Testimony

Richards does not intend to present any direct testimony in this proceeding. However, it reserves the right to respond to any direct testimony through responsive testimony. To the extent that it would present any testimony that testimony would be presented by Mr. Frank Richards. To the extent that one of the potential solutions to the issue raised by the Commission on remand deals with the appropriateness of entering into negotiated distribution rates, the potential for the generic application of such a policy is indirectly presented. Richards reserves the right to raise additional issues and to respond to all issues raised by other parties.

Respectfully submitted,



Craig A. Doll, Esquire
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(717) 566-9000

Attorney I.D. # 22814

Attorney for Richards Energy Group, Inc.

Dated: May 11, 2011

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2010-2161694 (Remand)
	:	
PPL Electric Utilities Corp.	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the Prehearing Memo of Richards Energy Group, Inc. upon the persons listed below via email first class mail, postage prepaid in accordance with the provisions of 52 Pa. Code §1.54.

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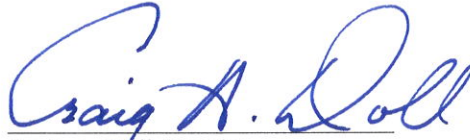
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Attorney for Richards Energy Group, Inc.

DATED: May 11, 2011