

**BEFORE THE
Pennsylvania Public Utility Commission**

**Re: Pennsylvania Public Utility Commission
v. PPL Electric Utilities Corporation;
Docket No. R-2010-2161694**

Prehearing Memorandum

May 11, 2011

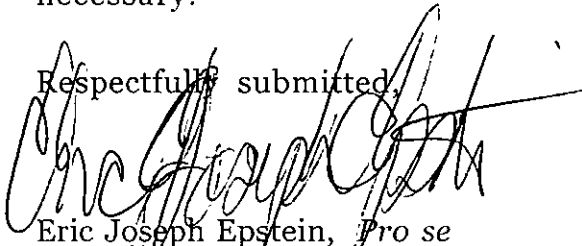
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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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
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**BEFORE THE
Pennsylvania Public Utility Commission**

**Re: Pennsylvania Public Utility Commission
v. PPL Electric Utilities Corporation;
Docket No. R-2010-2161694**

Prehearing Memorandum

I. History of the Proceeding

1) On January 5, 2011, the PP&L Industrial Customer Alliance (“PPLICA”) filed a Petition seeking reconsideration of the Pennsylvania Public Utility (“the Commission” or “PUC”) Opinion and Order (“Order”) entered on December 21, 2010, Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation (“PPL” or “the Company”) (Docket No. R-2010-2161694.

2) On April 27, 2011, the Commission granted PPLICA’s Petition and remanded limited issues to the Honorable Susan D. Colwell Administrative Law Judge (“ALJ”).

3) On April 28, 2011, Eric Joseph Epstein (“Epstein” or “Mr. Epstein”) received a Prehearing Order from Administrative Law Judge Colwell scheduling an Initial Prehearing Conference for Monday, May 16, 2011 at 10:00 pm in Hearing Room #1, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA.

II. Statement of Issues

4) Mr. Epstein is a residential customer of PPL Electric Utilities Corporation.

5) One of the options offered by PPLICA is discounted rate relief for one of its members, i.e., Donsco, Incorporated.

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6) Mr. Epstein's initial evaluation of the Order indicates the need for a Commission investigation into the following issues:

- a) Precedential nature of rate relief;
- b) Proposed rate structure and rate design are appropriate, i.e., discriminatory pricing for an individual customer;
- c) Allocation of the proposed distribution rate increase between and among customer classes is just, reasonable and nondiscriminatory;
- d) Applicability of special rate tariffs for residential customers, e.g. senior citizens.

7) Mr. Epstein reserves the right to raise any issues or questions relating to any discrepancies or errors in the Above-Referenced proceeding.

8) Eric Joseph Epstein anticipates pursuing these issues during this proceeding, and reserves the right to address other issues of concern, and to respond to issues raised by other Parties.

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.

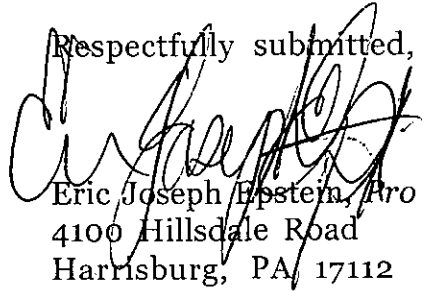
IV. Proposed Schedule & Discovery Rules

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. Settlement Discussions

11) 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 handwritten signature in black ink, appearing to read "Eric Joseph Epstein", is written over the typed name and address.

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

Dated: May 11, 2011

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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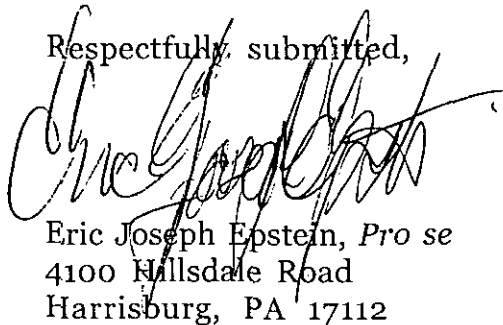
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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric Joseph Epstein". The signature is written in a cursive, somewhat stylized font and is positioned above the printed name and address of the signatory.


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

May 11, 2011

Mr. Eric Epstein
1100 Hillsdale Rd
Harrisburg, PA 17112

AMNESTY
INTERNATIONAL

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Commonwealth Keystone Building
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Harrisburg, PA 17120

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