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September 28, 2011

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
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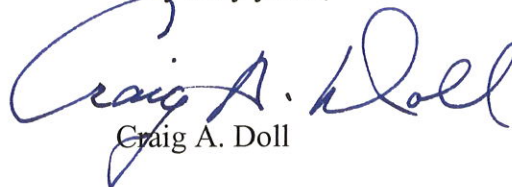
Re: Petition of PPL Electric Utilities for Approval to Implement a Reconciliation
Rider for Default Service Supply
Commission Docket No. P-2011-2256365

Dear Secretary Chiavetta:

Enclosed for filing is the original of the Prehearing Memo of Richards Energy Group, Inc. in the above captioned proceeding which was filed electronically this date. A copy of this Petition has been served upon the presiding Administrative Law Judge and 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.

Very truly yours,


Craig A. Doll

Enclosure

cc: Per Certificate of Service
F. Richards

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval to Implement a Reconciliation : P-2010-2256365
Rider for Default Service :

**Prehearing Memo
of
Richards Energy Group, Inc.**

To the Honorable Susan D. Colwell, Administrative Law Judge:

Background

On August 25, 2011, PPL Electric Utilities Corporation (“PPL”) filed an Amended Petition for Approval to Implement a Reconciliation Rider and Competitive Transition Rider for Default Service Supply.¹ The Office of Small Business Advocate and Dominion Retail d/b/a Dominion Energy Solutions filed Answers to the Petition. RESA filed an Answer in Opposition to the Petition and the Office of Consumer Advocate filed a Notice of Intervention and Public Statement. On August 28, 2011 the PPL Industrial Customer Alliance (“PPLICA”) filed its Answer. On August 28, 2011, Richards Energy Group, Inc. (“Richards”) filed a Petition to Intervene. That Petition is pending.

By Prehearing Order, Your Honor ordered that all parties must submit a Prehearing Memorandum consistent with the requirements of 52 Pa. Code § 5.222(d), to be filed no later than September 30, 2011. This Prehearing Memorandum on behalf of Richards is filed in compliance with paragraph 5 of that order.

¹ PPL initially filed the original Petition on August 3, 2011.

Issues

Richards has reviewed the original Petition and the Amended Petition and has identified the following broad issues:

1. Whether cost recovery through a non-bypassable Competitive Transition Rider and Reconciliation Rider are consistent with the statutory language which permits recovery of all reasonable costs of providing default service?
2. Whether under collections, if recovery is found appropriate by the Commission, should be recovered from those customers who were not default customers of PPL on January 1, 2010 or since, which is the date PPL avers the costs were incurred?
3. Whether the amount of the under collection is reasonable?
4. Whether the under collections experienced for one customer class should be recovered from all customer classes?
5. Whether any under collection amount, which is a cost of receiving default transmission and generation service from PPL, is appropriately eliminated from the Price to Compare?

At this time, the Petition itself does not contain a sufficient explanation of how the proposed riders will work or the impact that they may have on individual classes of customers as well as current and future shopping customers. Richards anticipates that through the filing of direct testimony by PPL and informal and formal discovery and discussions the issues presented will be refined or modified.

Witnesses

At present, Richards intends to present three witnesses in this proceeding: Mr. Frank Richards, Mr. Jeff Good and Mr. Terry Lee. Mr. Richards will be presented as its technical witness. Mr. Lee, who owns Haydn Zug's Restaurant, and Mr. Good, Chief Operating Officer of Amelia's Grocery Outlets, will present testimony relative to the impact of the PPL proposal upon existing shopping customers.

Discovery

At this time Richards plans to participate in any informal discovery offered by PPL. To the extent that Richards will engage in formal discovery, Richards will abide by whatever schedule to which the statutory parties agree.

Settlement

Richards is fully committed to resolve some or all of the issues set forth above or that may arise during the course of this proceeding without resort to expensive litigation.

Schedule

Richards is prepared to discuss the schedule which meets the needs of all of the active parties.

Respectfully submitted,



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Attorney I.D. # 22814

Attorney for Richards Energy Group, Inc.

Dated: September 28, 2011

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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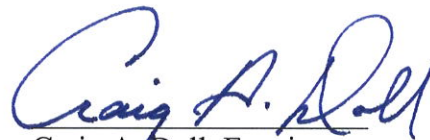
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