



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Fax  
www.postschell.com

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Anthony D. Kanagy

akanagy@postschell.com  
717-612-6034 Direct  
717-731-1985 Fax  
File #: 02507/140070

September 30, 2011

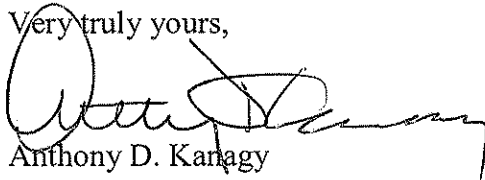
Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**RE: Petition of PPL Electric Utilities Corporation for Approval to Implement a  
Reconciliation Rider for Default Supply Service  
Docket No. P-2011-2256365**

Dear Secretary Chiavetta:

Enclosed please find the Prehearing Conference Memorandum of PPL Electric Utilities Corporation for the above-referenced proceeding. Copies have been provided as indicated on the Certificate of Service.

Very truly yours,



Anthony D. Kanagy

ADK/skr

Enclosure

cc: Certificate of Service  
Honorable Susan D. Colwell

## 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 E-MAIL AND FIRST CLASS MAIL

Tanya J. McCloskey  
Aron J. Beatty  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923

Richard A. Kanaskie  
Senior Prosecutor  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

Elizabeth Triscari, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101

Pamela C. Polacek  
Patrick J. Gregory  
McNees, Wallace & Nurick  
P.O. Box 1166  
100 Pine Street  
Harrisburg, PA 17108-1166

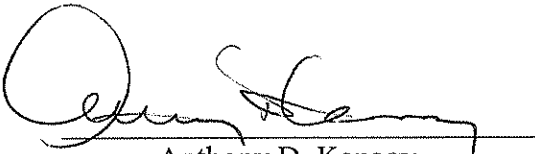
Todd Stewart  
Hawke, McKeon, Sniscak & Kennard, LLP  
100 N. 10<sup>th</sup> Street  
Harrisburg, PA 17101

Daniel Clearfield  
Deanne O'Dell  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17108-1248

Craig A. Doll  
P.O. Box 403  
25 West Second Street  
Hummelstown, PA 17036

Holly Rachel Smith  
Holly Rachel Smith, PLLC  
Hitt Business Center  
3803 Rectortown Road  
Marshall, VA 20115

Date: September 30, 2011



Anthony D. Kanagy

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :  
for Approval to Implement a Reconciliation : Docket No. P-2011-2256365  
Rider for Default Supply Service :

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

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**TO ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:**

PPL Electric Utilities Company (“PPL Electric” or the “Company”) hereby files this Prehearing Memorandum in the above-captioned matter, and states as follows:

**I. PROCEDURAL HISTORY**

1. On August 3, 2011, PPL Electric filed the above-captioned Petition at Docket No. P-2011-2256365. On August 25, 2011, PPL Electric filed an Amended Petition requesting approval from the Pennsylvania Public Utility Commission (“Commission”) to submit a revised tariff supplement to Tariff Electric-Pa. P.U.C. No. 201, to implement a Reconciliation Rider and a Competitive Transition Rider (“CTR”) to become effective June 1, 2012. As more fully described in the Amended Petition, the proposed Reconciliation Rider and CTR will provide a competitively neutral method to refund and recoup over and under collections related to transmission service and generation supply service. The proposed Reconciliation Rider and CTR will help assure accurate and timely recovery of transmission service and generation supply costs in a fair and equitable manner.

2. The Office of Small Business Advocate filed a Notice of Intervention, Public Statement, and Answer on August 18, 2011.

3. The Office of Consumer Advocate filed a Notice of Intervention and Public Statement on August 23, 2011.
4. The Retail Energy Supply Association filed an Answer to the Petition on August 23, 2011, and a Petition to Intervene on September 14, 2011.
5. Dominion Retail, Inc. d/b/a Dominion Energy Solutions filed an Answer on August 23, 2011, and an Answer to the Amended Petition on September 14, 2011.
6. The PP&L Industrial Customer Alliance filed an Answer on August 25, 2011.
7. The Richards Energy Group, Inc. filed a Petition to Intervene on August 29, 2011.
8. On August 29, 2011, Notice of an Initial Prehearing Conference in the above referenced matter was issued. The Initial Prehearing Conference is scheduled for October 5, 2011, at 10:00 a.m. before the Honorable Susan D. Colwell (the "ALJ").
9. On September 11, 2011, the ALJ issued a Prehearing Order.
10. On September 23, 2011, Wal-Mart Stores East, L.P. and Sam' East, Inc. ("Wal-Mart") filed a Petition to Intervene.

## **II. SERVICE OF DOCUMENTS**

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

Anthony D. Kanagy  
Post & Schell, P.C.  
17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-612-6034  
Fax: 717-731-1985  
E-mail: [akanagy@postschell.com](mailto: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

Paul E. Russell at [perussell@pplweb.com](mailto:perussell@pplweb.com), David B. MacGregor at [dmacgregor@postschell.com](mailto:dmacgregor@postschell.com), and Christopher T. Wright at [cwright@postschell.com](mailto:cwright@postschell.com).

12. 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.

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

13. If this matter proceeds to hearings or if requested by the ALJ, PPL Electric will offer testimony from the following witnesses on the following subject matters:

<b><u>Witnesses</u></b>	<b><u>Subjects</u></b>
1. Joseph M. Kleha Manager of Regulatory Compliance and Rates PPL Electric Utilities Corporation Two North Ninth Street Allentown, PA 18101 Tel: 484-634-3297	- Explain the conditions and problems that PPL Electric has experienced with the reconciliation of over or under collections related to transmission service and generation supply charges. - Explain PPL Electric's proposal to implement a Reconciliation Rider and a Competitive Transition Rider.

14. PPL Electric reserves the right to call additional witnesses and/or present testimony on additional issues and subject matters that may arise during the course of the proceeding.

### **IV. DISCOVERY**

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

**V. LITIGATION SCHEDULE**

16. PPL Electric notes that, with the exception of the hearing dates, the parties have agreed to the following schedule. PPL Electric will continue to work with the Presiding Officer and other parties to develop a mutually acceptable schedule.

PPL Direct	Monday, October 3, 2011
Prehearing Conference	Wednesday, October 5, 2011
Other Parties' Direct	Wednesday, November 2, 2011
Rebuttal	Wednesday, November 16, 2011
Surrebuttal	Wednesday, November 30, 2011
Hearings	Week of December 5 - 9, 2011 (Oral Rejoinder at Hearing)
Main Briefs	Monday January 9, 2012
Reply Briefs	Monday, January 23, 2012

17. The preceding dates for testimony are agreed to be "in-hand" delivery. Testimony and exhibits shall be delivered electronically by 4:30 p.m. on the due date, with follow-up hard copies by first-class mail or hand delivery.

18. PPL Electric is not aware of any substantial public interest being expressed that would warrant the scheduling of a public input hearing.

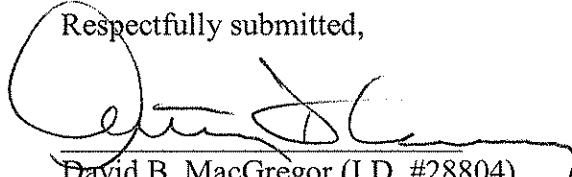
**VI. PROTECTION OF CONFIDENTIAL INFORMATION**

19. If necessary and should the case proceed to hearing, PPL Electric will timely submit an appropriate Motion for Protective Order.

**VII. SETTLEMENT DISCUSSIONS**

20. PPL Electric is open and available for settlement discussions with the other parties.

Respectfully submitted,



Paul E. Russell (I.D. #21643)  
Associate General Counsel  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
Voice: 610.774.4254  
Fax: 610.774.6726  
E-mail: perussell@pplweb.com

David B. MacGregor (I.D. #28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Voice: 215.587.1197  
Fax: 215.320.4879  
E-mail: dmacgregor@postschell.com

Anthony D. Kanagy (ID # 85522)  
Christopher T. Wright (ID #203412)  
Post & Schell, P.C.  
17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: akanagy@postschell.com  
E-mail: cwright@postschell.com

Of Counsel:

Post & Schell, P.C.

Dated: September 30, 2011

Attorneys for PPL Electric Utilities Corporation