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File #: 2507/140056

December 6, 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: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket Nos. R-2011-2264771, C-2011-2267808 and C-2011-2268983**

Dear Secretary Chiavetta:

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

Respectfully Submitted,



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
Jennedy S. Johnson
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
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Office of Small Business Advocate
Commerce Building
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Kenneth L. Mickens
The Sustainable Energy Fund of Central
Eastern Pennsylvania
316 Yorkshire Drive
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Eric Joseph Epstein
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Harrisburg, PA 17112

Todd S. Stewart, Esquire
Hawke, McKeon & Sniscak LLP
100 N. 10th Street
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Harrisburg, PA 17101

Date: December 6, 2011



Anthony D. Kanagy

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket Nos. R-2011-2264771
v.	:	C-2011-2267808
	:	C-2011-2268983
PPL Electric Utilities Corporation	:	

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

TO ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), pursuant to 52 Pa. Code § 5.224(c), hereby files this Prehearing Memorandum in the above-captioned matter, and states as follows:

I. PROCEDURAL HISTORY

1. On September 26, 2011, PPL Electric filed Supplement No. 110 to Tariff – Electric Pa. P.U.C. No. 201, in which the Company proposed to implement a new Time-of-Use (“TOU”) program for its residential and small commercial and industrial (“small C&I”) customer classes to become effective for service beginning with the participating customer’s first bill cycle commencing after March 1, 2012. In its filing, PPL Electric proposed a TOU program that adds a percentage charge or premium to the fixed price default service rate in on-peak periods and provides a percentage discount off of the fixed price default service rate in off-peak periods. This methodology will maintain the appropriate relationship between TOU rates and fixed price default service rates, and should provide the appropriate incentive for customers to shift load from on-peak to off-peak periods.

2. On October 5, 2011, a Petition to Intervene was filed by Dominion Retail, Inc.

3. On October 12, 2011, the Bureau of Investigation and Enforcement (“BI&E”) filed a Notice of Appearance.

4. On October 18, 2011, the Office of Small Business Advocate (“OSBA”) filed a complaint at Docket Number C-2011-2268983. On the same day, the Office of Consumer Advocate (“OCA”) filed a Notice of Appearance and a complaint at Docket Number C-2011-2267808.

5. On October 21, 2011, a Petition to Intervene was filed by Eric J. Epstein.

6. On October 27, 2011, a Petition to Intervene was filed by the Sustainable Energy Fund of Central Pennsylvania.

7. On October 31, 2011, PPL Electric filed an answer to the Complaint of the OCA.

8. On November 7, 2011, PPL Electric filed an answer to the Complaint of the OSBA.

9. On November 10, 2011, the Pennsylvania Public Utility Commission (“Commission”) entered an Order suspending the rates proposed in Supplement No. 110 until September 1, 2012, unless otherwise directed by Order of the Commission, and ordering an investigation of the rates, rules and regulations proposed in Supplement No. 110.

10. On November 28, 2011, the Commission’s Secretary issued a Prehearing Notice in the above-captioned matter. The Initial Prehearing Conference is scheduled for December 9 2011, at 10:00 a.m. before the Honorable Judge Susan D. Colwell (the “ALJ”).

II. SERVICE OF DOCUMENTS

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

Anthony D. Kanagy, Esquire
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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, David B. MacGregor at dmacgregor@postschell.com, and Jessica R. Rogers at jrogers@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 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:

<u>Witnesses</u>	<u>Issues</u>
1. David R. Woodruff Manager – Load Analysis PPL Electric Utilities Corporation Two North Ninth Street Allentown, PA 18101	<ul style="list-style-type: none">• TOU Program Design• TOU On-peak and Off-peak Periods• TOU Pricing

<p>2. Joseph M. Kleha Manager – Regulatory Compliance and Rates PPL Electric Utilities Corporation Two North Ninth Street Allentown, PA 18101</p>	<ul style="list-style-type: none"> • History and Background of the TOU Program • Program Eligibility • Customer Transition Process • Term of the TOU Plan • Other TOU Tariff Issues
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14. PPL Electric reserves the right to call additional witnesses and to present testimony on additional issues and subject matters that may arise during the course of the proceeding.

IV. LITIGATION SCHEDULE

15. PPL Electric is working with the parties in an attempt to develop a mutually agreeable procedural schedule.

16. At this time, PPL Electric proposes the following schedule:

Company Direct Testimony	December 9, 2011
Other Parties Direct Testimony	January 5, 2012
Rebuttal Testimony	January 24, 2012
Surrebuttal Testimony	January 31, 2012
Hearing	February 3, 2012
Main Brief	March 2, 2012
Reply Brief	March 22, 2012

All dates are for in-hand delivery. The Company proposes that electronic mail for receipt and distribution of testimony and exhibits will satisfy in-hand service dates, with follow-up hard copies provided by first class mail.

V. SETTLEMENT

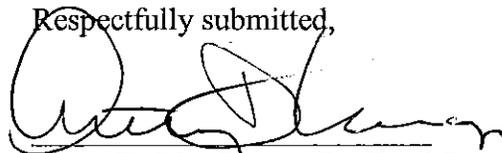
8. PPL Electric will work with the parties in an attempt to resolve these proceedings through settlement.

VI. DISCOVERY

17. To date, the Company has not received any discovery requests. PPL Electric is willing to engage in formal and informal discovery.

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

Respectfully submitted,



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Of Counsel:

Post & Schell, P.C.

Dated: December 6, 2011

Attorneys for PPL Electric Utilities Corporation