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December 6, 2011

VIA ELECTRONIC FILING AND HAND DELIVERY

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

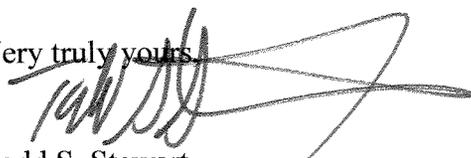
RE: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation; Default Supply Service Docket No. R-2011-2264771. **PREHEARING CONFERENCE MEMORANDUM OF DOMINION RETAIL, INC. d/b/a DOMINION ENERGY SOLUTIONS**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission are the original and three (3) copies of the Prehearing Conference Memorandum of Dominion Retail, Inc. d/b/a Dominion Energy Solutions in the above-captioned docket. Copies of this Memorandum have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please contact the undersigned.

Very truly yours,



Todd S. Stewart
Counsel for Dominion Retail, Inc.

TSS/alh
Enclosures

cc: The Honorable Administrative Law Judge Susan D. Colwell (via hand delivery)

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true 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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Todd S. Stewart

Dated this 6th day of December 2011

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	
	:	Docket No. R-2011-2264771
Petition of PPL Electric Utilities	:	

**PREHEARING CONFERENCE MEMORANDUM
OF DOMINION RETAIL, INC**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:

AND NOW COMES, Dominion Retail, Inc. d/b/a Dominion Energy Solutions (“DES”), by and through its counsel, and hereby submits its Prehearing Conference Memorandum in the above captioned matter to presiding Administrative Law Judge Susan D. Colwell in anticipation of a Prehearing Conference currently scheduled to be held Friday, December 9, 2011 at 10 AM. Preparation for that Prehearing Conference, DES states and avers as follows:

I. Brief Procedural History

1. On September 26, 2011 PPL Electric Utilities Corporation (“PPL”) filed Supplement No. 110 to its Tariff Electric Pa. P.U.C. No. 201, with an effective date of March 1, 2011. Through its Supplement, PPL proposed changes in its rates, rules and regulations which, in effect, would create a new Time-of-Use (“TOU”) program for its residential and small commercial/industrial class customers.

2. The proposed TOU program replaces the existing program market estimate program with a percentage charge or premium that is applied to a fixed price default service rate for on-peak periods and provides a percentage discount off of the fixed price for off-peak periods.

3. On October 5, 2011, DES filed a Petition to Intervene in which contends that while TOU rates are required by Act 129, 66 Pa. CS § 2807(f)(5), it also is true that the approved rate making methodology for PPL's current effective TOU rates has produced serious anomalies and has created non-market reflective extremes in PPL's TOU rates. DES contends that PPL's TOU rates do not reflect actual market prices for on- and off-peak periods, are contrary to the legislative intent and cause market distortions. DES further contends that there is a fundamental design flaw in the manner in which the TOU rates have been designed and implemented.

4. By Hearing Notice issued November 28, 2011, the Commission assigned this matter to Presiding Administrative Law Judge Susan D. Colwell for adjudication, and provided notice of a Prehearing Conference to be held on December 9, 2011.

II. Witness and Issues

5. DES is presently evaluating witnesses for this proceeding and will notify Your Honor and the parties of that selection as soon as practicable.

6. It is expected that the witness(s) that DES will call will address DES' concerns with regard to the design and implementation of PPL's TOU rates, and ensure that the flaws reflected in the presently effective TOU rates are not perpetuated in any future TOU rate program. DES' witness will provide recommendations to ensure that PPL's TOU program, and the rate structure eventually deployed by PPL comply with Act 129 and that any TOU rate structure is competitively neutral.

III. Discovery

7. DES has not yet engaged in discovery but will endeavor to cooperate with the other parties, to the extent necessary, to amend the Commission's discovery rules to accommodate whatever schedule is ultimately approved in this matter.

IV. Scheduling

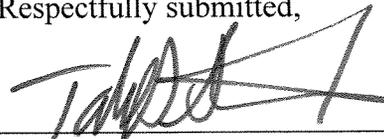
8. PPL circulated a proposed schedule to the parties on Monday, December 5, 2011. DES is not satisfied entirely with PPL's proposal, but it will commit to work with PPL and the other parties to develop a schedule that is acceptable to all.

V. Electronic Service Among Participants

9. DES prefers that service among the parties be accomplished through electronic mail with hard copies to be served by first class mail on the same day. DES requests, however, that any discovery request or other document for which a response is required within a mandated time frame, that is served after the 12:00 noon on a Friday, or on a day before a Commission holiday, be treated as having been served on the following business day, and that all electronic service be accomplished prior to 5:00 PM.

WHEREFORE, DES submits this Prehearing Conference Memorandum for Your Honor's consideration at the scheduled prehearing conference.

Respectfully submitted,



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DATED: December 6, 2011