

**BEFORE THE
Pennsylvania Public Utility Commission**

Re: Petition of PPL Electric Utilities Corporation for
Approval of Time of Use Supplement No. 110 to
Tariff Electric PA PUC, No 201,
Docket No. R-2011-2264771

Prehearing Memorandum

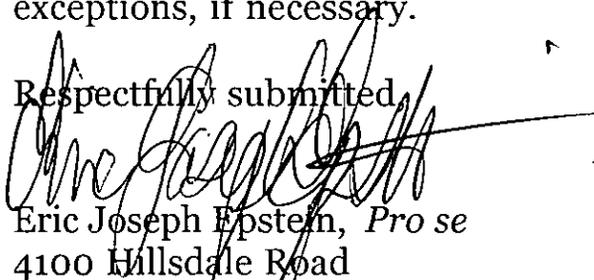
December 6, 2011

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

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*
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Re: Petition of PPL Electric Utilities Corporation for
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Prehearing Memorandum

I. History of the Proceeding

1) This Proceeding involves PPL Electric Utilities Corporation's ("PPL" or "the Company") filing at the Public Utility Commission's ("Commission") for Approval of Time of Use Supplement No. 110 to Tariff Electric PA PUC, No 201, Docket No. R-2011-2264771.

2) On September 23, 2010, PPL Electric Utilities Corporation filed a Petition for Approval of Time of Use Supplement No. 94 to Tariff Electric PA PUC, No 201, Docket No. R-2010 with an issue date of September 23, 2010 and an effective date of January 1, 2011.

3) PPL filed Supplement No. 110 to its Tariff Electric-PA. PUC No. 201 on September 26, 2011 to implement a revised Time-of-Use ("TOU") program.

4) On November 4 28, 2011, Eric Joseph Epstein ("Epstein" or "Mr. Epstein") received a Prehearing Order from Administrative Law Judge Colwell scheduling an Initial Prehearing Conference for December 9, 2011 at 10:00 pm in Hearing Room 31, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA.

II. Background

5) Mr. Epstein has been a residential customer of PPL for over 25 years, and has testified and intervened on issues relating to consumer education, universal service programming, rate structure, and reliability and service since 1985.

6) Mr. Epstein participated in PPL Electric Utilities Corporation's Request for Approval of a Competitive Bridge Plan Docket No. RP-0006227.

7) Epstein intervened and was an Active Party in PPL Electric Utilities Request for Approval to Offer Customers a Voluntary Alternative Energy Program and to Bank Alternative Energy Credits.

8) Mr. Epstein also intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of a Default Service Program and Procurement Plan for the Period January 1, 2011 through May 14, 2014.

9) Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of an Energy Efficiency and Conservation Plan.

10) In addition, Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of Time of Use Supplement No. 71 Tariff Electric PA PUC. No 201 Issued on July 31, 2009, Effective for Service On and After January 1, 2010.

11) Mr. Epstein intervened in PPL Electric Utilities Corporation's Petition for Approval of Time of Use Supplement No. 94 to Tariff Electric PA PUC, No 201, Docket No. R-2010 with an issue date of September 23, 2010 and an effective date of January 1, 2011.

12) Mr. Epstein is an active participant in PPL's Collaborative stake holder process, a proponent of TOU tariffs, and offered TOU programming suggestions during the TOU collaborative in 2007-2008 and in Direct Testimony submitted to the PUC on October 30, 2009.

III. Statement of Issues

13) Mr. Epstein is analyzing PPL's assumptions, estimates, projections, methodologies, statements, citations, predictions, and conclusions associated with the Company's Present Filing.

14) The Present filing is an attempt to remove barriers, increase participation and eliminate current shortcomings as a result of the Supplement No. 94 Tariff.

16) PPL's Present filing will require an evaluation of the following issues to avoid duplicating problems incurred the implementation of the Supplement No. 94 filing, included but not limited to:

- Customer participation levels.
- Implementation of Best Management & Practices and Lessons Learned.
- Oversight and implementation of existing programs; pricing points and pricing differentials.
- Program design.
- Quantifiable energy savings.
- Real-time pricing and time zones.
- The viability of the proposed TOU program.

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

18) 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.

IV. Proposed Witnesses

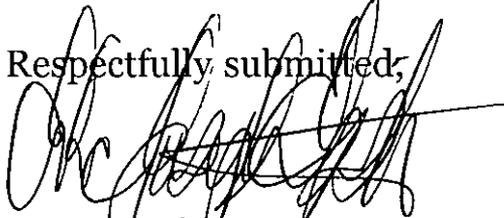
19) Mr. Epstein respectfully reserves the right to modify or supplement his witness list during the course of this proceeding. In the event that Eric Joseph Epstein decides to modify or supplement his witness list, Epstein will inform the parties and the Administrative Law Judge.

V. Proposed Schedule & Discovery Rules

20) 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.

VI. Settlement Discussions

21) 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,

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

Dated: December 6, 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
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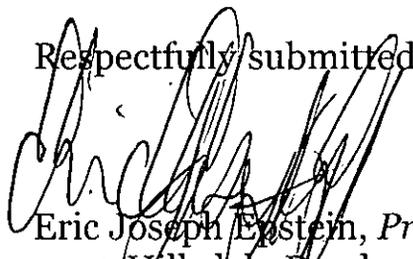
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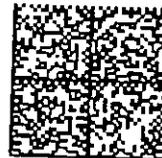
Respectfully submitted,



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