

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**Petition of PPL Electric Utilities Corporation for Approval of its
Default Service Program and Procurement Plan for the Period of
June 1, 2013 through May 21, 2015**

Docket Nos. P-2012-2302074

**PREHEARING MEMORANDUM OF THE
COALITION FOR AFFORDABLE UTILITY SERVICES
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby submits this Prehearing Memorandum in anticipation of Prehearing Conference scheduled for June 6, 2012 at 10:00 am before the Honorable Susan D. Colwell.

On May 1, 2012 PPL Electric Utilities Corporation (“PPL” or the “Company”) filed a Petition for Approval of its Default Service Program (“Petition”). In addition to specifying its procurement strategy for the default service period in question, PPL has proposed a retail opt-in aggregation program, a standard offer customer referral program, and a new and moving customer program in response to the Commission’s March 2, 2012 Order in *Investigation of Pennsylvania’s Retail Electricity Markets*, Docket No. I-2011-2237952. On June 1, 2012, CAUSE-PA filed a Petition to Intervene and Answer to PPL’s Petition.

I. Service on CAUSE-PA

CAUSE-PA consents to accept electronic delivery of documents on the deadlines for their filing, if followed by one (1) hard copy delivered by first class mail to its counsel of record:

Patrick M. Cicero, Esq.
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II. Issues to be Presented

CAUSE-PA is concerned about the effect that the proposed retail market enhancements will have on the long-term affordability of service for economically vulnerable households within PPL's service territory. While CAUSE-PA is still formulating its positions on all of the issues presented in PPL's filing, it has tentatively identified the following issues that it will address in this proceeding:

A. Retail Opt-In Auction

CAUSE-PA intends to examine both the hazards and benefits that this auction would have for low-income residential customers and submits that PPL should be required to demonstrate that each component of its opt-in auction proposal is permissible under current law and regulations and that the process proposed adequately safeguards the rights of all residential customers, particularly low-income and otherwise vulnerable customers.

CAUSE-PA intends to determine whether PPL's CAP customers should participate in the auction and, if so, whether other Universal Service Programs could be fully integrated into their

proposed auction structure without any reduction of benefits and safeguards to Universal Service Program participants.

B. Customer Referral Programs

CAUSE-PA intends to examine PPL's customer referral program whether CAP customers and other low-income customers could be enrolled in these programs without any reduction in benefits.

III. Witnesses and Testimony

CAUSE-PA intends to present the following witness to testify in this matter, but reserves the right to call additional witnesses as may be warranted upon proper notice to Your Honor and the parties:

Mr. Stephen R. Krone, Esquire
C/O MidPenn Legal Services, Inc
213-A North Front Street
Harrisburg, PA 17101
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Mr. Krone will address the issues identified above and any other issues that may arise in the course of this proceeding.

IV. Scheduling, Discovery, and Testimony

CAUSE-PA will work with the other parties to come to a schedule which suits the needs of all of the parties and the Commission. CAUSE-PA supports the submission of direct testimony of witnesses in writing in advance of the hearing.

V. **Settlement**

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourage the parties to engage in settlement early in the process.

VI. **Conclusion**

CAUSE-PA respectfully submitted this Prehearing Memorandum.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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June 4, 2012