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June 4, 2012

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation for approval of a Default Service Program  
and Procurement Plan for the Period June 1, 2013 through May 31, 2015,  
Docket No. P-2012-2302074

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Dear Secretary Chiavetta:

On behalf of the Retail Energy Supply Association ("RESA") enclosed for filing please find the original of its Prehearing Memo along with the electronic filing confirmation page with regard to the above-referenced matter. Copies have been served in accordance with the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Deanne M. O'Dell".

Deanne M. O'Dell

DMO/lww  
Enclosure

cc: Hon. Susan Colwell, w/enc.  
Cert. of Service w/enc.

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of RESA's Prehearing Memo upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Email and First Class Mail**

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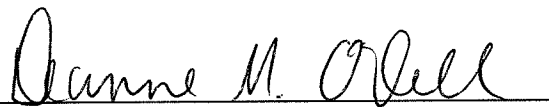
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Dated: June 4, 2012

  
Deanne M. O'Dell, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :  
Corporation for Approval of a Default : Docket No. P-2012-2302074  
Service Program and Procurement Plan For :  
The Period June 1, 2013 through May 31, :  
2015 :

**PREHEARING MEMORANDUM  
OF RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to 52 Pa. Code §§ 5.72-5.75, and subject to the granting of the Petition to Intervene filed by the Retail Energy Supply Association (“RESA”)<sup>1</sup> in the above captioned proceeding, RESA submits this Prehearing Memorandum.

**I. REPRESENTATION**

RESA’s attorneys in this matter are:

Daniel Clearfield, Esquire  
Deanne M. O’Dell, Esquire  
Carl Shultz, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
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RESA agrees to accept electronic service to all attorneys listed above to be followed up with one hard copy of the documents served.

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<sup>1</sup> RESA’s members include: Champion Energy Services, LLC; ConEdison Solutions; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Energetix, Inc.; Energy Plus Holdings LLC; Exelon Energy Company; GDF SUEZ Energy Resources NA, Inc.; Green Mountain Energy Company; Hess Corporation; Integrys Energy Services, Inc.; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; PPL EnergyPlus, LLC; Reliant; Stream Energy; TransCanada Power Marketing Ltd. and TriEagle Energy, L.P.. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

## II. PRESENTLY IDENTIFIED ISSUES

RESA is a trade association of power marketers, independent power producers, and a broad range of companies within the Mid-Atlantic marketplace, each of whom support the electric services industry and seek to develop a more competitive power industry. RESA members are licensed to sell electric energy in the markets of Pennsylvania's major electric distribution companies ("EDCs"), including the service territory of PPL..

RESA has identified the following issues that should be examined in this proceeding:

- Whether PPL's overall default service supply plan is consistent with the Commission's regulations and the Public Utility Code.
- The effectiveness of the PPL's default service plan to promote retail market development for the benefit of consumers in the Companies' service territories.
- Whether PPL's proposed change from quarterly default service rate changes to semiannual rate changes and the corresponding changes to PPL's reconciliation mechanism are consistent with the Commission's regulations and the Public Utility Code.
- Whether PPL's proposal to remove all spot market purchases from the portfolio mix for customer classes other than the large commercial and industrial customers is consistent with the Commission's regulations and the Public Utility Code.
- The design, purpose and potential effectiveness of PPL's proposed Opt-In Auction program, customer referral program, and Time of Use rates to promote retail market development for the benefit of consumers in PPL's service territory.

At this time, RESA continues to evaluate its position on the proposed default service plan and will refine its position based on further study of the proposals, review of discovery and additional input from other parties. RESA reserves the right to address other issues identified through its continued review and analysis of the filing or raised by other parties.

### **III. WITNESSES**

At this time, RESA has preliminarily identified the following witness that are likely to present testimony in this matter.

Aundrea Williams, Vice President  
Retail Regulatory Strategy & Policy  
NRG  
1201 Fannin St.  
Houston, TX 770002.  
(713) 537-2360 (voice)  
(832) 584-2053 (fax)  
Aundrea.williams@nrgenergy.com

Christopher H. Kallaher, Senior Director  
Government & Regulatory Affairs  
Direct Energy  
162 Cypress Street  
Brookline, Massachusetts 02445  
(617) 879-0668 (voice)  
(617) 879-0661 (fax)  
chris.kallaher@directenergy.com

Ms. Williams is likely to address issues related to the proposed procurement plan and Mr. Kallaher is likely to address issues related to the retail market enhancement programs. RESA reserves the right to present a witness as may be necessary depending on the course of the proceeding and will provide the Presiding Officer as well as the other parties in this matter reasonable notice if necessary. RESA also reserves its right to add additional witnesses or change the identity of its witnesses at any time upon appropriate notice to the Presiding Officer and the parties.

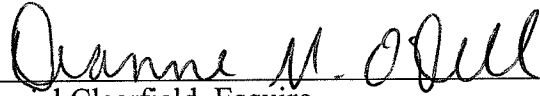
### **IV. LITIGATION SCHEDULE AND DISCOVERY RULES**

RESA is amenable to working with the other parties in this matter to adopt a reasonable litigation schedule and/or necessary modifications to the Commission's discovery rules.

**V. SETTLEMENT**

RESA is willing to participate in settlement discussions with any party to narrow the issues in this matter.

Respectfully submitted,



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Attorney I.D. 81064  
Carl Shultz, Esquire  
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Date: June 4, 2012

Attorneys for Retail Energy Supply Association