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June 4, 2012

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA HAND DELIVERY**

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


Dear Secretary Chiavetta:

Enclosed please find for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the original and three (3) copies of the Prehearing Memorandum of PP&L Industrial Customer Alliance ("PPLICA") concerning the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of this transmittal letter and Prehearing Memorandum, and kindly return them for our filing purposes. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By   
Adeolu A. Bakare

Counsel to PP&L Industrial Customer Alliance

Enclosures

c: Administrative Law Judge Susan D. Colwell (via E-mail and Hand Delivery)  
Certificate of Service

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PREHEARING MEMORANDUM  
OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

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Pursuant to the Notice of a Prehearing Conference published in the Pennsylvania Bulletin, 42 Pa. Bull. 2871, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Prehearing Memorandum in the above-captioned proceeding. PPLICA intends to participate in this proceeding as an "active" party.

**I. HISTORY OF THE PROCEEDING**

On May 1, 2012, PPL Electric Utilities Corporation ("PPL" or "Company") submitted to the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Petition for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013, through May 31, 2015, ("DSP" or "Petition") indicating that the request is submitted pursuant to Section 2807 of the Public Utility Code, 66 Pa. C.S. § 2807 and 52 Pa. Code §§ 54.181-54.189, and requests that the Commission rule on the Petition no later than February 1, 2013.

Contemporaneously with this Prehearing Memorandum, PPLICA filed a Petition to Intervene and Answer in this proceeding. A description of PPLICA is set forth in Paragraph 1 of PPLICA's Petition to Intervene and Answer.

## **II. ANTICIPATED ISSUES AND SUB-ISSUES**

PPLICA's preliminary review of the Company's filing indicates the need for Commission investigation into at least the following issues, which are discussed in greater detail in PPLICA's Petition to Intervene and Answer:

- (1) Whether PPL should modify its filed DSP to procure default service supply for Large Commercial and Industrial ("C&I") customers directly through the PJM Interconnection, L.L.C. market;
- (2) Whether PPL should modify its filed DSP to procure day-ahead spot market supply rather than real-time spot market supply for Large C&I default service customers; and
- (3) Ensuring that PPL recovers the costs of the Company's proposed Retail Market Enhancement Programs only from customers eligible to participate in the programs.

PPLICA anticipates pursuing these issues during this proceeding, and reserves the right to raise and address other issues of concern and to respond to issues raised by other parties.

## **III. PROPOSED WITNESSES**

PPLICA is in the process of evaluating whether it will sponsor testimony in this proceeding. In the event that PPLICA decides to sponsor testimony, it will inform the parties and the ALJ as soon as possible of the intended witness(es) and topics of testimony. PPLICA also intends to participate in this proceeding through the submission of discovery, the cross-examination of other parties' witnesses, participation in settlement negotiations as they occur, and the submission of briefs, exceptions, and reply exceptions, as necessary.

#### IV. PROPOSED SCHEDULE AND DISCOVERY RULES

PPLICA will cooperate with the ALJ 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.

#### V. POSSIBILITY OF SETTLEMENT

PPLICA is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully Submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the PP&L Industrial Customer Alliance

Dated: June 4, 2012

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA E-MAIL AND FIRST CLASS MAIL**

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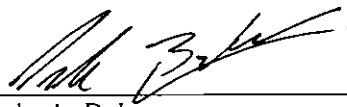
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Counsel to PP&L Industrial Customer Alliance

Dated this 4<sup>th</sup> day of June 2012, at Harrisburg, Pennsylvania.

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