

**BEFORE THE  
Pennsylvania Public Utility Commission**

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 :

June 3, 2012

**RECEIVED**

JUN -4 2012

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

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

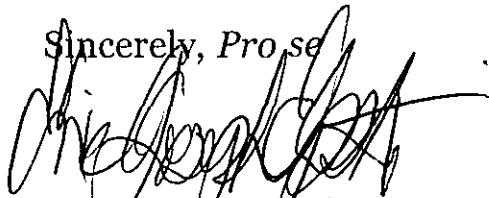
Dear Secretary Chiavetta:

Enclosed for filing with the Commission are an original and three (3) copies of Eric Joseph Epstein's ("Epstein" or "Mr. Epstein") Prehearing Memorandum in the above-referenced proceeding.

This Petition has been filed Pursuant to Pennsylvania Public Utility Commission Regulations, 52 Pennsylvania Code §§ Sections 5.71-5.74.

Eric Joseph Epstein, *Pro se* hereby files a Petition to Intervene.

Sincerely, *Pro se*



Eric Joseph Epstein  
4100 Hillsdale Road  
Harrisburg, PA 17112

cc: Certificate of Service

**BEFORE THE  
Pennsylvania Public Utility Commission**

**Re: Pennsylvania Public Utility Commission  
v. PPL Electric Utilities Corporation**

Docket No. R-2012-2302074

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**I. History of Proceeding**

PA PUBLIC UTILITY COMMISSION  
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1) On March 10, 2009 Eric Joseph Epstein's "Epstein" or "Mr. Epstein") submitted a Statement in Support of the Settlement Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period January 1, 2011 through May 14, 2014 Docket No. P-2008-2060309.

2) Mr. Epstein actively participated in the stakeholder collaborative convened by PPL.

3) PPL Electric Utilities (or "PPL" or "the Company") filed a Petition ("the Petition") for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015 on May 15, 2012 before the Pennsylvania Public Utility ("PUC" or Commission") on May 1, 2012.

4) The PUC notified parties on May 9, 2012 that a Pre-Hearing Conference was scheduled for June 6, 2012 at the Commonwealth Keystone Building in Hearing Room 2.

5) PPL's filed Direct Testimony on May 15, 2012 in support of the Petition , Re: Docket No. P-2012-2302074.

## II. Statement of Issues

6) Mr. Epstein is a residential customer of PPL Electric Utilities Corporation.

7) PPL's proposal will impact Mr. Epstein's rates.

8) Eric Joseph Epstein is presently analyzing PPL's assumptions, estimates, projections, methodologies, undocumented statements, citations, predictions, and conclusions associated with the Company's Filing.

9) Among the issues Mr. Epstein plans to raise include but are not limited to:

- Cost of externalities and cross subsidization.
- Customer privacy.
- Expenses claimed by PPL.
- Identification of fuel sources.
- Reliability of service.
- Rate structure and rate design.

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

11) 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.

### **III. Proposed Witnesses**

12) 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 ("ALJ").

### **IV. Proposed Schedule & Discovery Rules**

13) 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.

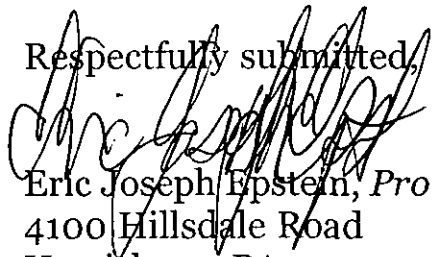
### **V. Public Input Hearings**

14) Mr. Epstein will attend and participate in Public Input Hearings.

### **VI. Settlement Discussions**

15) 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  
(7217)-541-1101  
lechambon@comcast.net

Dated: June 3, 2012

**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  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, Pa 17120

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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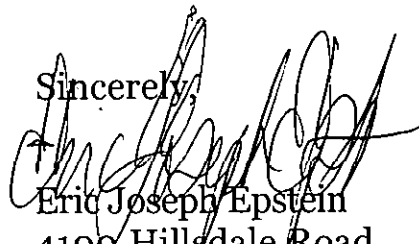
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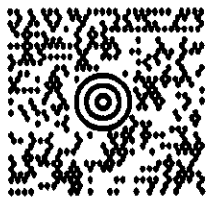
Sincerely,  
  
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Harrisburg, PA 17112

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(717) 541-1101  
THE UPS STORE #2204  
4075 LINGLESTOWN RD  
HARRISBURG PA 17112-1020

1 LBS 1 OF 1  
SHP WT: 1 LBS  
DATE: 04 JUN 2012

SHIP ROSEMARY CHIAVETTA, SECRETARY  
TO: PA PUBLIC UTILITY COMMISSION  
FL 3  
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HARRISBURG PA 17120-0079

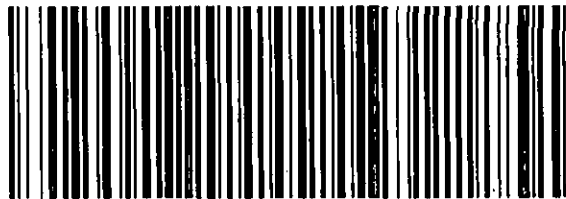


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