



COMMONWEALTH OF PENNSYLVANIA

June 27, 2013

E-FILED

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

**Re: Petition of PPL Electric Utilities Corporation for Approval of a Distribution System Improvement Charge
Docket No. P-2012-2325034**

Dear Secretary Chiavetta:

Enclosed for filing is the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

As evidenced by the enclosed certificate of service, all parties have been served as indicate.

Sincerely,

A handwritten signature in black ink that reads "Steven C. Gray".

Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Parties of Record
Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of a : **Docket No. P-2012-2325034**
Distribution System Improvement Charge :

**OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Representing the OSBA in this matter is Assistant Small Business Advocate Steven C. Gray.

Please address all correspondence as follows:

Steven C. Gray, Esquire
Office of Small Business Advocate
300 North Second Street, Suite 1102
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(717) 783-2525
(717) 783-2831 (fax)
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II. FILING BACKGROUND

On January 15, 2013, PPL Electric Utilities Corporation (“PPL” or the “Company”) filed a Petition for Approval of a Distribution System Improvement Charge (“Petition”) with the Commission. The OSBA filed a Notice of Intervention in this matter on March 22, 2013.

III. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 – Fax
rdk@indecon.com

In its May 23, 2013, Order, the Commission ordered, as follows:

3. That the following issues be assigned to the Office of Administrative Law Judge for hearing and preparation of a recommended decision:
 - a. Whether customers taking service under Rate Schedule LP-5 at transmission voltage rates should be included under the DSIC charge;
 - b. If revenues associated with the Company’s Act 129 Compliance Rider (ACR), Smart Meter Rider, Universal Service Rider, Net Metering Rider, and Competitive Enhancement Rider riders in PPL Electric’s tariff are properly included as distribution revenues;
 - c. Impact of accumulated deferred income taxes associated with DSIC investments;
 - d. Calculation of state income tax component of the DSIC revenue requirement.

Order, Docket Nos. P-2012-2325034, *et al.* (Order entered May 23, 2013), at 20, Ordering Paragraph Number 3.

The OSBA will participate in the case to assure that the interests of small business customers of PPL are adequately represented and protected. Specifically, the OSBA expects to focus on issues 3a and 3b as set forth in the Commission's May 23, 2013, Order.

The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

IV. SERVICE OF DOCUMENTS

The OSBA requests that all parties serve a hard copy of any document filed in this case upon the OSBA and the OSBA witness identified above. In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party.

V. SETTLEMENT

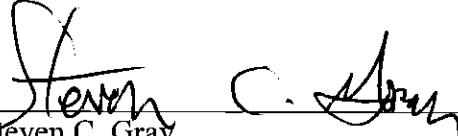
The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

VI. HEARING AND BRIEFING SCHEDULE

The OSBA supports the procedural schedule proposed by the Office of Consumer Advocate ("OCA") in the OCA's June 25, 2013, Prehearing Memorandum.

In light of the Governor's requirement to reduce the operating budget of Commonwealth Offices, the OSBA respectfully requests that the evidentiary hearings take place in Harrisburg.

Respectfully submitted,



Steven C. Gray
Attorney ID No. 77538
Assistant Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Dated: June 27, 2013

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of a Distribution System : **Docket No. P-2012-2325034**
Improvement Charge :

CERTIFICATE OF SERVICE

I certify that I am serving two copies of the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, by e-filing, e-mail, and/or first class mail (unless otherwise noted) upon the persons addressed below:

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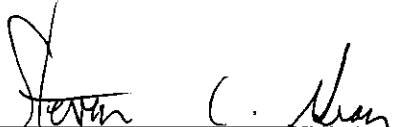
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Date: June 27, 2013