

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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July 3, 2013

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17101

RE: Office of Small Business Advocate  
v.  
PPL Electric Utilities Corporation  
Docket Nos. M-2013-2365092;  
C-2013-2367475

Dear Secretary Chiavetta:

Enclosed for filing please find the Office of Consumer Advocate's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'A. Beatty', with a long horizontal line extending to the right.

Aron J. Beatty  
Assistant Consumer Advocate  
PA Attorney I.D. # 86625

Enclosure

cc: Hon. David A. Salapa, ALJ  
Certificate of Service

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Office of Small Business Advocate	:	
	:	
v.	:	
	:	Docket Nos. M-2013-2365092
PPL Electric Utilities Corporation	:	C-2013-2367475

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PREHEARING MEMORANDUM OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to the Prehearing Conference Order of Administrative Law Judge David A. Salapa issued on June 28, 2013, Section 333 of the Public Utility Code, 66 Pa. C.S. § 333, and in anticipation of the Prehearing Conference scheduled for Tuesday, July 9, 2013, the Office of Consumer Advocate (OCA) provides the following information:

**I. INTRODUCTION**

On May 17, 2013, PPL Electric Utilities Corporation (PPL) filed its Generation Supply Charge-1 Reconciliation Report at Docket No. M-2013-2365092. On June 6, 2013, the Office of Small Business Advocate (OSBA) filed a Complaint against PPL’s May 17 Reconciliation Report. In its Complaint, the OSBA stated its belief that the Generation Supply Charge reconciliation mechanism “appears to be working reasonably well for Residential customers,” but “has resulted in inexplicably high and unstable rates for Small Commercial and Industrial – Fixed (“Small C&I”) customers.” OSBA Complaint at ¶6.

The Office of Consumer Advocate (OCA) filed a Notice of Intervention and Public Statement in this proceeding on June 24, 2013. The OCA intervened in this proceeding to help ensure that PPL's default service is priced appropriately and that any modifications to that pricing structure that may result from this proceeding do not negatively impact customers.

## **II. ISSUES**

The OCA is currently reviewing the reconciliation procedures at issue in this proceeding. The OCA further notes that the Commission opened an investigation into default service reconciliation issues at Docket No. M-2012-2314313. Default Service Reconciliation Interim Guidelines, Docket No. M-2012-2314313 (Order entered August 14, 2012). The OCA has provided Comments in that proceeding concerning default service reconciliation. The issues surrounding reconciliation are of considerable concern to the OCA.

## **III. WITNESSES**

The OCA has not identified a witness in this proceeding at this time. If issues arise that require the OCA to identify a witness, the OCA will notify the ALJ and parties immediately.

## **IV. SERVICE ON THE OCA**

The OCA will be represented in this case by Assistant Consumer Advocate Aron J. Beatty. Two copies of all documents should be served on the OCA as follows:

Aron J. Beatty  
Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor Forum Place  
Harrisburg, PA 17101-1923  
Telephone: (717) 783-5048  
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E-mail: [abeatty@paoca.org](mailto:abeatty@paoca.org)

## **V. PROPOSED SCHEDULE**

The OCA supports the schedule proposed by the OSBA and PPL in this proceeding.

**VI. DISCOVERY**

The OCA has not served discovery and is not proposing any modifications to the Commission's Regulations concerning discovery.

**VII. SETTLEMENT**

The OCA is willing to participate fully in all settlement discussions as needed.

Respectfully submitted,



Aron J. Beatty  
Assistant Consumer Advocate  
[ABeatty@paoca.org](mailto:ABeatty@paoca.org)

Counsel for:  
Tanya J. McCloskey  
Acting Consumer Advocate

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DATED: July 3, 2013  
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CERTIFICATE OF SERVICE

Office of Small Business Advocate :  
 : Docket Nos. M-2013-2365092  
 v. : C-2013-2367475  
 :  
 PPL Electric Utilities Corporation :

I hereby certify that I have this day served a true copy of the Office of Consumer Advocate's Prehearing Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 3rd day of July 2013.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Richard A. Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
Pa. Public Utility Commission  
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Harrisburg, PA 17101

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

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