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October 15, 2013

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor (filing room)  
Harrisburg, PA 17120

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; **PREHEARING CONFERENCE MEMORANDUM**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum of Interstate Gas Supply, d/b/a IGS Energy. As evidenced by the Certificate of Service, all parties to this proceeding have been served with a copy of this Memorandum.

If you have any questions with regard to this filing, please do not hesitate to contact me.

Very truly yours,

Todd S. Stewart  
*Counsel for Interstate Gas Supply, Inc.*

TSS/bes

Enclosures

cc: Honorable Susan D. Colwell, Administrative Law Judge  
Honorable Joel H. Cheskis, Administrative Law Judge  
Anthony Cusati, III, Interstate Gas Supply  
Paul Diskin, Director, Technical Utility Services, Pa. Public Utility Commission

## CERTIFICATE OF SERVICE

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

### VIA FIRST CLASS MAIL

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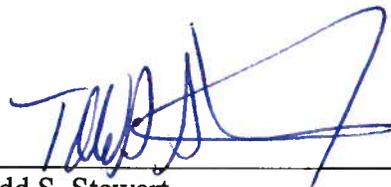
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Todd S. Stewart

*Counsel for  
Interstate Gas Supply, d/b/a IGS Energy*

Date: October 15, 2013

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :  
For Approval of a Default Service Program : P-2012-2302074  
and Procurement Plan for the Period :  
June 1, 2013 through May 31, 2015 :

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**PREHEARING CONFERENCE MEMORANDUM  
OF INTERSTATE GAS SUPPLY, INC.**

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**TO: THE HONORABLE JOEL CHESKIS  
THE HONORABLE SUSAN D. COLWELL**

AND NOW COMES, Interstate Gas Supply, Inc., d/b/a IGS Energy ("IGS"), by and through its counsel, Hawke McKeon & Sniscak LLP, and hereby provides this Prehearing Conference Memorandum in compliance with the October 4, 2013 Prehearing Order of the Administrative Law Judges ("ALJs") in the above-captioned matter. By this Prehearing Conference Memorandum, IGS evidences its intention to participate in this process and matter before the Pennsylvania Public Utility Commission ("Commission").

In support of its Prehearing Conference Memorandum, IGS states and avers as follows:

**I. Introduction.**

1. IGS participated in the Default Service Plan of PPL Electric Utility Corporation ("PPL") in this docket, and has actively participated as an electric generation supplier ("EGS"), serving customers in the PPL service territory.

2. For purposes of this matter, IGS is represented by the following counsel:

Todd S. Stewart, Attorney I.D. No. 75556  
Hawke McKeon & Sniscak LLP  
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**II. Discovery.**

3. IGS does not propose any specific proposed modifications to the Commission's rules pertaining to discovery, but will work cooperatively with the other parties in this proceeding to propose and agree to rules that are satisfactory to all parties to this proceeding.

**III. Need for Protective Order.**

4. IGS does not intend to propound discovery which would illicit confidential or highly confidential matter at this point; but if a Protective Order becomes necessary, IGS will work with the other parties to submit a proposed Protective Order that is acceptable to all parties.

**IV. Issues.**

5. IGS continues to review PPL's filing in this docket. At this juncture, and without the benefit of having the PPL direct testimony, IGS has identified the primary issue, to date, as being ensuring that the terms and conditions of the proposed pilot TOU plan are in compliance with law, workable, efficient and acceptable, so that qualified EGSs, such as IGS, will be willing and able fairly to participate in the program. Other more specific issues related to this general subject may be developed in the course of this proceeding.

**V. Witness.**

6. IGS has not yet determined whether it will secure the services of a witness for purposes of this proceeding, or whether it will submit testimony. IGS reserves its right to do so at any appropriate point in this proceeding, whether through its own direct evidence or in response to testimony provided by other parties. IGS will endeavor to notify Your Honors and the parties of any such witness selection, if such identification is made.

**VI. Litigation Schedule.**

7. IGS does not propose any modifications to the Proposed Litigation Schedule at this time, and will work with the parties to achieve a Schedule that is acceptable to Your Honors and to all parties.

WHEREFORE, Interstate Gas Supply, Inc., d/b/a IGS Energy submits this Prehearing Conference Memorandum in anticipation of Prehearing Conference currently scheduled for Monday, October 21, 2013, at 1:00 p.m.

Respectfully Submitted,



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*Counsel for  
Interstate Gas Supply, d/b/a IGS Energy.*

Dated: October 15, 2013