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File #: 151904

October 17, 2013

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**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**

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Dear Secretary Chiavetta:

Enclosed for filing is the Prehearing Memorandum of PPL Electric Utilities Corporation for the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Matthew J. Agen

MJA/jl  
Enclosures

cc: Certificate of Service  
Honorable Susan D. Colwell  
Honorable Joel H. Cheskis

**CERTIFICATE OF SERVICE**  
**(Docket No. P-2012-2302074)**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, 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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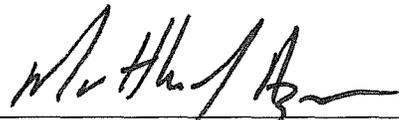
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Date: October 17, 2013



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Matthew J. Agen

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING MEMORANDUM OF  
PPL ELECTRIC UTILITIES CORPORATION**

**TO ADMINISTRATIVE LAW JUDGES JOEL CHESKIS AND SUSAN D. COLWELL:**

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), pursuant to 52 Pa. Code § 5.222(d), and in compliance with the Prehearing Order issued by Administrative Law Judges Joel Cheskis and Susan D. Colwell on October 4, 2013, hereby files this Prehearing Memorandum in the above-captioned matter, and states as follows:

**I. PROCEDURAL HISTORY**

1. On August 23, 2013, PPL Electric filed a Petition requesting Pennsylvania Public Utility Commission (“Commission”) approval of a new Pilot Time-of-Use (“TOU”) Program, which will replace the currently effective TOU rates. PPL Electric filed its Petition pursuant to 52 Pa. Code § 5.41 and in compliance with the Commission’s Order in *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 Nos. P-2012-2302074, *et al.* (Order Entered May 23, 2013) (“May 23 Order”), which required the Company to file a new time-of-use rate proposal on or before August 23, 2013.

2. Previously, on May 1, 2012, PPL Electric submitted a TOU proposal as part of its Default Service Program and Procurement Plan for the period June 1, 2013 through May 31, 2015 (“DSP 2013-2015”). In its January 24, 2013 Order, in the DSP 2013-2015 proceeding, the Commission approved, with modification, PPL Electric’s default service plan. *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 (Order Entered January 24, 2013) (“January 24 Order”). Regarding TOU rate issues, the Commission did not approve PPL Electric’s as-filed TOU plan or an alternative proposal presented during the DSP 2013-2015 proceeding. In the January 24 Order, the Commission stated that PPL Electric should schedule a collaborative with interested stakeholders in order to discuss and resolve any issues regarding the development and implementation of a TOU rate option. Pursuant to the January 24 Order, PPL Electric initiated a collaborative and discussions with the parties regarding potential TOU program alternatives.

3. On March 25, 2013, as part of a compliance filing, PPL Electric requested authority to continue its currently effective TOU rate option until the Commission approves a successor program. The Commission’s May 23 Order approved PPL Electric’s request and permitted the then currently effective TOU rate option to continue until the Commission approves a successor program.

4. Under the terms of the proposed new Pilot TOU Program filed on August 23, 2013, the Company will provide a TOU rate option to customers in its tariff, but will rely on the retail market and electric generation suppliers (“EGS”) to provide actual TOU service to customers. Retail EGSs that choose to participate in the Pilot TOU Program will offer TOU rate options and provide the TOU service to customers in PPL Electric’s service territory. PPL

Electric's proposal is subject to Commission approval and will be part of the Company's retail tariff once approved.<sup>1</sup> The August 23, 2013 Petition includes a detailed description of the Pilot TOU Program, details regarding EGS and customer participation and a contingency proposal.

5. As of mid-day on October 17, 2013, the following persons or entities filed answers in response to the August 23, 2013 Petition, in the above-captioned proceeding:

- Sustainable Energy Fund of Central Eastern Pennsylvania – Answer filed September 6, 2013.
- Office of Consumer Advocate – Answer filed September 12, 2013.
- Coalition of Affordable Utility Services and Energy Efficiency in Pennsylvania – Answer filed September 12, 2013.

## II. SERVICE OF DOCUMENTS

6. PPL Electric requests that all documents be served on:

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7. PPL Electric agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon:

David B. MacGregor - dmacgregor@postschell.com  
Matthew J. Agen - matthewagen@postschell.com  
Paul E. Russell - perussell@pplweb.com

8. PPL Electric's attorneys are authorized to accept service on behalf of the Company in this proceeding. PPL Electric requests that the Commission and all parties of record

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<sup>1</sup> The Company filed a form of tariff on September 9, 2013 at Docket No. P-2012-2302074 that incorporated the new Pilot TOU Program.

serve copies of all discovery requests and answers, correspondence, Commission Orders, and any other documents issued in this proceeding on its attorneys at the address and via the email addresses stated above.

**III. DISCOVERY**

9. To date, the Company has not received discovery requests from other parties. PPL Electric encourages the use of informal discovery processes to expedite discovery.

10. Based upon past experience, PPL Electric believes that a protective order may be appropriate with regard to discovery in this proceeding. PPL Electric reserves the right to request a protective order to limit the disclosure of trade secrets or other confidential information.

**IV. LITIGATION SCHEDULE**

11. PPL Electric has no objection to the schedule set forth in the October 4, 2013 Prehearing Order, and reproduced below.

Company Direct Testimony	December 12, 2013
Opposing Party Direct Testimony	January 17, 2014
Rebuttal Testimony	February 7, 2014
Surrebuttal Testimony	February 14, 2014
Evidentiary Hearing	February 26, 2014
Main Brief	March 21, 2014
Reply Brief	April 11, 2014

12. All dates are for in-hand delivery. The Company proposes that electronic mail for receipt and distribution of testimony and exhibits will satisfy in-hand service dates, with follow-up hard copies provided by first class mail.

**V. WITNESSES AND ISSUES**

13. The names and positions of witnesses that PPL Electric expects to call and the subject matter of their testimony are as follows:

- Renae G. Yeager - Director - Distribution Regulatory and Business Affairs, PPL Electric Utilities Corporation. Two North Ninth Street, Allentown, Pennsylvania 18101. Ms. Yeager will address the following topics in her testimony: Background Regarding TOU, Extension of the Current TOU Rates, the TOU Collaborative, Description of the proposed Pilot TOU Program, EGS and Customer Participation in the Pilot TOU Program and Reconciliation.
- James M. Rouland - Supervisor - Energy Procurement, PPL Electric Utilities Corporation. Two North Ninth Street, Allentown, Pennsylvania 18101. Mr. Rouland will address the following topics in his testimony: Implementation of the Pilot TOU Program and the proposed Contingency Plan.

14. PPL Electric reserves the right to substitute witnesses or add witnesses, as appropriate, depending upon the issues raised and witnesses presented by other parties in the proceeding.

15. The primary issue in this proceeding is whether the proposed new Pilot TOU Program, including the proposed contingency plan, as proposed by PPL Electric on August 23, 2013, is reasonable and appropriate.

**VI. SETTLEMENT**

16. At this time, the parties have not discussed the possibility of settlement. PPL Electric has a substantial track record of resolving matters by reaching a settlement with the involved parties and will use every effort to reach a settlement in this proceeding.

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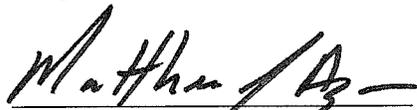
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Of Counsel:

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Dated: October 17, 2013

Respectfully submitted,



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