



COMMONWEALTH OF PENNSYLVANIA

October 17, 2013

E-Filed

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

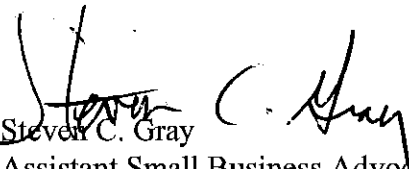
Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015
Docket No. P-2012-2302074

Dear Secretary Chiavetta:

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

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

Sincerely,


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 Default Service Program and : Docket No. P-2012-2302074
Procurement Plan for the Period June 1, 2013 :
through May 31, 2015 :**

**PREHEARING MEMORANDUM
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers 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 the above-referenced matter is Acting Small Business Advocate Steven C. Gray. Please address all correspondence in that matter as follows:

Steven C. Gray, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
sgray@pa.gov

II. FILING BACKGROUND

PPL Electric Utilities Corporation (“PPL” or the “Company”) filed a Petition for the Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 13, 2015 (“Petition”) with the Commission on May 1, 2012. The OSBA filed an Answer and Notice of Intervention on June 4, 2012.

PPL included a Pilot Time of Use (“TOU”) Program with the Company’s Petition. Ultimately, as required by the Commission, PPL filed an updated Pilot TOU Program on August 23, 2013.

III. IDENTIFICATION OF WITNESS 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

The OSBA will participate in this proceeding to assure that the interests of small business customers are adequately represented and protected.

In general, the OSBA supports the Company’s August 23rd Pilot TOU Program as a major improvement over PPL’s current TOU program. Furthermore, as proposed by the August 23rd Pilot TOU Program, the OSBA supports the use of electric generation suppliers (“EGS”) as the provider of the TOU service. Nevertheless, the OSBA will evaluate the details of the August

23rd Pilot TOU Program to ensure that it is a functional program that will benefit PPL's small business customers.

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 upon the OSBA and the OSBA witness identified above. In addition to hard copies of pleadings and briefs, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. Service by electronic mail only is not acceptable.

V. SETTLEMENT

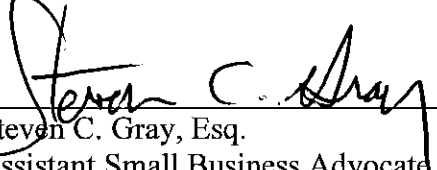
The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

VI. HEARING AND BRIEFING SCHEDULE

The procedural schedule proposed in the October 4, 2013, Prehearing Order is acceptable to the OSBA.

The OSBA respectfully requests that the evidentiary hearings take place in Harrisburg.

Respectfully submitted,



Steven C. Gray, Esq.
Assistant Small Business Advocate
Attorney ID # 77538

Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

Dated: October 17, 2013

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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:

Hon. Susan D. Colwell
Administrative Law Judge
Pa. Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265
(717) 787-1191
(717) 787-0481 (fax)
scolwell@pa.gov
(E-mail and Hand Delivery)

Hon. Joel Cheskis
Administrative Law Judge
Pa. Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265
(717) 787-1191
(717) 787-0481 (fax)
jcheskis@pa.gov
(E-mail and Hand Delivery)

James A. Mullins, Esquire
Erin L. Gannon, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
555 Walnut Street - 5th Floor
Harrisburg, PA 17101-1923
(717) 783-5048
(717) 783-7152 (fax)
jmullins@paoca.org
egannon@paoca.org
tmccloskey@paoca.org
(E-mail and Hand Delivery)

Regina L. Matz, Esquire
Bureau of Investigation & Enforcement
Pa. Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265
(717) 787-1976
(717) 772-2677 (fax)
rmatz@pa.gov

Michael W. Hassell, Esquire
Post & Schell, PC
17 North Second Street - 12th Floor
Harrisburg, PA 17101-1601
(717) 731-1970
(717) 731-1985 (fax)
mhassell@postschell.com

Divesh Gupta, Esquire
Constellation NewEnergy, Inc.
100 Constellation Way - #500C
Baltimore, MD 21202
(410) 470-3158
(443) 213-3556 (fax)
divesh.gupta@constellation.com

Stephen L. Huntoon, Esquire
NextEra Energy Resources, LLC
801 Pennsylvania Avenue, N.W. - #220
Washington, DC 20004
(202) 349-3348
shuntoon@nexteraenergy.com

Pamela C. Polacek, Esquire
Adeolu A. Bakare, Esquire
McNees Wallace & Nurick
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
(717) 232-8000
(717) 260-1730 (fax)
ppolacek@mwn.com
abakare@mwn.com

Eric J. Epstein
4100 Hillsdale Road
Harrisburg, PA 17112
lechambon@comcast.net

Melanie J. Elatieh, Esquire
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406
(610) 992-3750
(610) 992-3258 (fax)
ElatiehM@ugicorp.com

Daniel Clearfield, Esquire
Deanne O'Dell, Esquire
Carl Shultz, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street - 8th Floor
Harrisburg, PA 17101
(717) 237-6000
(717) 237-6019 (fax)
dclearfield@eckertseamans.com
dodell@eckertseamans.com
cshultz@eckertseamans.com

Patrick M. Cicero, Esquire
Harry S. Geller, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
(717) 236-9486
(717) 233-4088 (fax)
pulp@palegalaid.net

Gary A. Jeffries
Dominion Retail, Inc.
501 Martindale Street - #400
Pittsburgh, PA 15212-5817
Gary.A.Jeffries@dom.com
(E-Mail Only)

Charles E. Thomas III, Esquire
Norman J. Kennard, Esquire
Thomas Long Niesen & Kennard
P. O. Box 9500
Harrisburg, PA 17108-9500
(717) 255-7600
(717) 236-8278 (fax)
cet3@thomaslonglaw.com
nkennard@thomaslonglaw.com

Vince Parisi, Esquire
Interstate Gas Supply
6100 Emerald Parkway
Dublin, OH 43016
vparisi@igsenergy.com
(E-Mail Only)

Todd S. Stewart, Esquire
William E. Lehman, Esquire
Hawke McKeon & Sniscak, LLP
100 North 10th Street
P. O. Box 1778
Harrisburg, PA 17101
(717) 236-1300
(717) 236-4841 (fax)
tsstewart@hmslegal.com
welehman@hmslegal.com

Kenneth L. Mickens, Esquire
316 Yorkshire Drive
Harrisburg, PA 17111
(717) 343-3338
(717) 657-0938 (fax)
kmickens11@verizon.net

Brian J. Knipe, Esquire
Buchanan Ingersoll & Rooney, PC
17 North Second Street - 15th floor
Harrisburg, PA 17101-1503
(717) 237-4280
(717) 233-0852 (fax)
brian.knipe@bipc.com

Amy M. Klodowski, Esquire
FirstEnergy Solutions Corp.
800 Cabin Hill Drive
Greensburg, PA 15601
(724) 838-6765
(234) 678-2370 (fax)
aklodow@firstenergycorp.com

David B. MacGregor, Esquire
dmacgregor@postschell.com
(E-mail Only)

David I. Fein
Exelon Corporation
10 S. Dearborn Street - 47th Floor
Chicago, IL 60603
(312) 394-2116
david.fein@exeloncorp.com

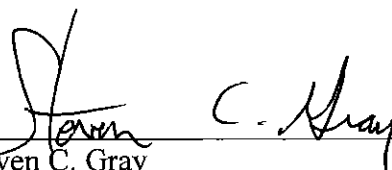
Amy Hamilton
Exelon Corporation
300 Exelon Way
Kennett Square, PA 19348
(610) 765-6933
amy.hamilton@exeloncorp.com

Paul E. Russell, Esquire
perussell@pplweb.com
(E-mail Only)

Matthew J. Agen, Esquire
matthewagen@postschell.com
(E-mail Only)

Richard Hahn
LaCapra Associates, Inc.
One Washington Mall - 9th Floor
Boston, MA 02108
(617) 778-2467
rhahn@lacapra.com
(E-mail Only)

Date: October 17, 2013



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