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October 17, 2013

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

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

Dear Secretary Chiavetta:

Attached please find for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Prehearing Memorandum of the PP&L Industrial Customer Alliance ("PPLICA") in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By   
Adeolu A. Bakare

Counsel to PP&L Industrial Customer Alliance

Enclosures

c: Administrative Law Judge Susan D. Colwell (via E-mail and First Class Mail)  
Certificate of Service

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## CERTIFICATE OF SERVICE

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

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Adeolu A. Bakare

Counsel to PP&L Industrial Customer Alliance

Dated this 17<sup>th</sup> day of October, 2013, at Harrisburg, Pennsylvania.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PREHEARING MEMORANDUM  
OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

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Pursuant to the Prehearing Order issued by Administrative Law Judge ("ALJ") Susan D. Colwell, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Prehearing Memorandum in the above-captioned proceeding.

**I. HISTORY OF THE PROCEEDING**

On August 23, 2013, PPL Electric Utilities Corporation ("PPL" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Petition for Approval of a new Pilot Time-of-Use ("TOU") Program ("Petition"). PPL filed the Petition pursuant to a Commission directive set forth in the Order entered May 23, 2013, in the above-captioned proceeding regarding PPL's Default Service Program ("DSP") for the period June 1, 2013, through May 31, 2015.

PPLICA filed a Petition to Intervene and Answer in this proceeding on June 4, 2012. A description of PPLICA is set forth in Paragraph 1 of PPLICA's Petition to Intervene and Answer.

**II. ANTICIPATED ISSUES AND SUB-ISSUES**

PPLICA intends to monitor PPL's proposed TOU Program, including modifications and recommendations proposed by parties other than PPL, to ensure that program implementation does not unreasonably shift costs or discriminate towards PPL's Large Commercial and Industrial ("C&I") customers. PPLICA intends to address any cost recovery or cost allocation

methodologies applicable to PPL's distribution rates or riders. PPLICA anticipates pursuing these issues during this proceeding, and reserves the right to raise and address other issues of concern and to respond to issues raised by other parties.

### **III. PROPOSED WITNESSES**

At this time, PPLICA does not anticipate sponsoring testimony in this proceeding. In the event that PPLICA decides to sponsor testimony, it will inform the parties and the ALJ as soon as possible of the intended witness(es) and topics of testimony. PPLICA also intends to participate in this proceeding through the submission of discovery, the cross-examination of other parties' witnesses, participation in settlement negotiations as they occur, and the submission of briefs, exceptions, and reply exceptions, as necessary.

### **IV. PROPOSED SCHEDULE AND DISCOVERY RULES**

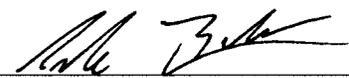
PPLICA will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any ALJ directives.

**V. POSSIBILITY OF SETTLEMENT**

PPLICA is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully Submitted,

McNEES WALLACE & NURICK LLC

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Dated: October 17, 2013