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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: PPL Electric Utilities Corporation Transmission Service Charge
Effective June 1, 2011; Docket No. M-2010-2213754**

PPL Electric Utilities Corp. Transmission Service Charge; M-2011-2239805

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Memorandum of PP&L Industrial Customer Alliance in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. 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).

VIA E-MAIL AND FIRST CLASS MAIL

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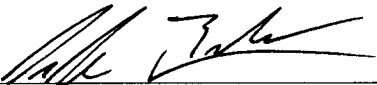
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Adeolu A. Bakare

Counsel to PP&L Industrial Customer Alliance

Dated this 17th day of October, 2013, at Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation	:	
Proposed Transmission Service Charge	:	M-2010-2213754
Reconciliation for the 12 months ended	:	
November 30, 2010	:	

PPL Electric Utilities Corporation	:	
Transmission Service Charge Effective	:	M-2011-2239805
June 1, 2011	:	

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

Pursuant to the September 27, 2013, 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 proceedings.

I. HISTORY OF THE PROCEEDING

On June 7, 2013, PPL Electric Utility Corporation's ("PPL" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Petition for Approval to Refund Certain Transmission Charges ("TSC Refund Petition"). On June 27, 2013, the PP&L Industrial Customer Alliance ("PPLICA") filed an Answer to the TSC Refund Petition.

On August 15, 2013, the Commission entered an Opinion and Order addressing both an ongoing Investigation into PPL's Transmission Service Charge ("TSC") reconciliation methods and the subsequent TSC Refund Petition ("TSC Refund Order"). The TSC Refund Order compelled PPL to file a revised TSC Refund Plan "with supporting spreadsheets, schedules, and documentation, to repay the currently suspended funds owed to the large commercial and industrial-primary and large commercial and industrial-transportation default service pool customer classes consistent with this Order." TSC Refund Order, p. 30. Pursuant to the TSC

Refund Order, the Revised TSC Refund Plan would be referred to the Office of Administrative Law Judge for hearings and decision.

On September 16, 2013, PPL filed the Revised TSC Refund Plan. Consistent with the TSC Refund Order, the Revised TSC Refund Plan was assigned to ALJ Colwell. A Prehearing Conference has been scheduled in this proceeding for October 21, 2013.¹

II. SERVICE LIST

PPLICA is represented in this matter by Pamela C. Polacek and Adeolu A. Bakare. All correspondence, notices, documents, orders or other communications with respect to this proceeding should be addressed to Pamela C. Polacek at the following address:

Pamela C. Polacek
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100 Pine Street
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Harrisburg, PA 17108-1166
Phone: (717) 232-8000
Fax: (717) 260-1763
ppolacek@mwn.com

In addition and to the extent feasible, PPLICA requests that any electronic service list also include Adeolu A. Bakare at the following address: abakare@mwn.com.

III. ANTICIPATED ISSUES AND SUB-ISSUES

PPLICA is currently reviewing the information and data filed in support of the TSC Refund Plan rates to determine whether the proposed rates are just, reasonable and nondiscriminatory, as required by Sections 1301 and 1304 of the Public Utility Code, 66 Pa. C.S. §§ 1301 & 1304. PPLICA propounded discovery upon the Company requesting additional information regarding this matter and received a response on October 10, 2013. Based on the information available to date, PPLICA submits that this proceeding should, at minimum, address the following issues:

¹ Notably, both PPLICA and PPL filed Petitions for Reconsideration of the TSC Refund Order. On September 12, 2013, the Commission entered an Order granting both Petitions for Reconsideration pending review on the merits.

- (a) Investigate the interest calculation reflected in PPL's Revised TSC Refund Plan;
- (b) Ensure that PPL does not recover costs of the TSC Refund Plan from Large Commercial and Industrial ("C&I") customers, consistent with the TSC Refund Order; and
- (c) Allow PPLICA to participate fully in the evidentiary proceeding, cross-examine all PPL witnesses, present its own evidence and witnesses, and offer arguments on its own behalf.

PPLICA anticipates pursuing these issues during this proceeding and reserves the right to raise further issues and to respond to all issues raised by other parties.

IV. PROPOSED WITNESSES

PPLICA is still in the process of evaluating the necessity of witness(es) for this proceeding. PPLICA also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions and reply exceptions, if necessary.

V. PROPOSED SCHEDULE AND DISCOVERY RULES

PPLICA does not oppose the schedule set forth in the prehearing memorandum filed by PPL. However, expedited discovery may be necessary to accommodate the testimony deadlines proposed by PPL. Accordingly, PPLICA requests modification of the Commission's discovery rules as follows:

1. The response period for replying to written interrogatories, requests for production, requests for admissions, or requests for entry of inspection is ten (10) calendar days of receipt, unless otherwise indicated. Responses may be served electronically but hard copies must follow by first-class mail.
2. Objections to interrogatories, requests for production and requests for admissions are to be communicated orally to the propounder within three (3) calendar days of receipt and in writing within five (5) calendar days of receipt. The parties are directed to confer, by telephone or e-mail, and attempt to resolve the objections.

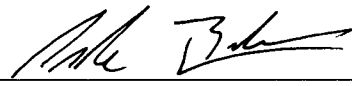
3. Motions to dismiss objections and to compel responses shall be filed and served on the ALJs and other parties within three (3) calendar days of receipt of the written objections. Answers to such motions shall be filed and served within three (3) calendar days after filing of the motion.
4. If the objections are not resolved, counsel will alert the ALJs by e-mail of the need for a ruling, and a conference call will be scheduled. The ALJs will make a ruling over the telephone and not reduce it to writing unless requested to do so.
5. Interrogatories, requests for production and requests for admissions that are objected to but which are not made the subject of a motion to compel will be deemed withdrawn.
6. Interrogatories, motions to compel and responses are to be served electronically as well as on paper.
7. Requests for admissions shall be deemed admitted unless answered within ten (10) calendar days or objected to within ten (10) calendar days or objected to within five (5) calendar days of service of the requests.

VI. 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

By 
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Dated: October 17, 2013