

*Please reply to Harrisburg Office

October 17, 2013

VIA Electronic Filing

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

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; **Prehearing Conference Memorandum**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing
Conference Memorandum of Dauphin County Industrial Development Authority. All parties
have been served with a copy of this document as shown on the Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Very Truly Yours,

SALZMANN HUGHES, P.C.



Scott T. Wyland
*Counsel for Dauphin County Industrial
Development Authority*

STW/smk

Enclosure

cc: Honorable Susan D. Colwell, Administrative Law Judge
Honorable Joel H. Cheskis, Administrative Law Judge

Concentrating in Environmental, Land Use, Municipal, Real Estate, Corporate, Estate Planning and Administration, and General Civil Litigation

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING CONFERENCE MEMORANDUM
OF THE DAUPHIN COUNTY INDUSTRIAL DEVELOPMENT AUTHORITY**

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

Pursuant to the Prehearing Conference Order dated October 4, 2013, and subject to the granting of the Petition to Intervene filed by the Dauphin County Industrial Development Authority ("DCIDA") pursuant to 52 Pa. Code §§ 5.72-5.75 in the above-captioned matter, DCIDA, by and through its counsel, Salzmann Hughes, P.C., submits this Prehearing Memorandum.

REPRESENTATION

1. DCIDA will be represented in this matter by:

Scott T. Wyland, Attorney ID # 52660
Salzmann Hughes, P.C.
105 N. Front Street, Suite 205
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DCIDA agrees to accept electronic service to the attorney listed above to be followed up with one hard copy of the documents served to the above-listed address.

PRESENTLY IDENTIFIED ISSUES

2. DCIDA is a current time-of-use ("TOU") customer of PPL Electric Utilities Corporation ("PPL").

3. DCIDA is in the process of reviewing PPL's filing in this docket to identify issues and to establish DCIDA's position with respect to those issues. DCIDA intends to monitor PPL's proposed TOU pilot program and any and all recommendations of other parties with respect to that program.

4. Reserving the right to supplement its identification of the issues, DCIDA presently identifies the primary issue as being whether PPL's proposed pilot TOU plan: (1) complies with the Public Utility Code, the Public Utility Commission's regulations, and any other applicable legal and regulatory requirements; (2) is a reasonable and functional program; and (3) is otherwise consistent with the interests of DCIDA as a TOU customer.

5. DCIDA reserves the right to identify and address additional issues related to this matter through its continued review and analysis of the filings or issues raised by other parties.

NEED FOR A PROTECTIVE ORDER

6. At this time, DCIDA does not anticipate providing discovery that would include confidential information requiring a Protective Order. DCIDA will work with the ALJs and other parties in the event a Protective Order becomes necessary.

DISCOVERY, EVIDENCE, WITNESSES, AND SCHEDULING

7. Due to the early stage of this proceeding DCIDA has not yet determined what witnesses it will use or what testimony it will submit. DCIDA continues to evaluate whether to present witnesses and testimony in this proceeding. DCIDA reserves the right to retain witnesses and submit testimony as necessary in the direct or rebuttal phases of these proceedings. DCIDA will notify the ALJs and other parties if and when it identifies and selects witnesses.

8. DCIDA proposes no modification to the Proposed Litigation Schedule at this time. DCIDA is willing to work with other parties to reach a schedule that is acceptable for all parties and the ALJs.

9. DCIDA is amenable to working with other parties to achieve any necessary modifications to the Commission's discovery rules in this proceeding.

WHEREFORE, DCIDA submits this Prehearing Conference Memorandum in anticipation of the Prehearing Conference currently scheduled for Monday, October 21, 2013, at 1:00 p.m., and subject to the granting of DCIDA's Petition to Intervene.

Respectfully Submitted,

SALZMANN HUGHES, P.C.

Date: 10.17.13

By: 

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct 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).

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Dated this 17th day of October, 2013



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