

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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March 21, 2014

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

RE: PP&L Industrial Customer Alliance v. PPL
Electric Utilities Corporation
Docket No. C-2013-2398442

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully submitted,

A handwritten signature in cursive script that reads "Amy E. Hirakis".

Amy E. Hirakis
Assistant Consumer Advocate
PA Attorney I.D. # 310094

Enclosures

cc: Hon. Susan D. Colwell, ALJ
Certificate of Service

180898

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PP&L Industrial Customer Alliance	:	
	:	
v.	:	C-2013-2398440
PPL Electric Utilities Corporation	:	
PP&L Industrial Customer Alliance	:	
	:	
v.	:	C-2013-2398442
PPL Electric Utilities Corporation	:	

PREHEARING MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to Section 333 of the Public Utility Code and the Prehearing Conference Order issued in this matter on March 11, 2014, by Administrative Law Judge Susan D. Colwell, the Office of Consumer Advocate (OCA) provides the following information:

I. INTRODUCTION

On October 22, 2013, PPL filed Supplement No. 139 to its Tariff Electric – Pa. P.U.C. No. 201 (Supplement No. 139) with the Pennsylvania Public Utility Commission, with an effective date of November 1, 2013. Supplement No. 139 reflects modifications to the Company’s Act 129-1 Compliance Rider (ACR-1). Also on October, PPL filed Supplement No. 140 to its Tariff Electric – Pa. P.U.C. No. 201 (Supplement No. 140), with an effective date of November 1, 2013. Supplement No. 140 reflects modifications to the Company’s Act 129-2 Compliance Rider (ACR-2). According to the Company, Supplement Nos. 139 and 140 are

designed to avoid significant ACR-1 and ACR-2 over/undercollections. On December 23, 2013, PP&L Industrial Customer Alliance (PPLICA) filed formal complaints against Supplement Nos. 139 and 140 alleging that the Supplements constitute unjust and unreasonable rates under Act 129 and Sections 1301 and 1307 of the Public Utility Code.

The case was assigned to the Office of Administrative Law Judge and further assigned to ALJ Susan D. Colwell. On March 11, 2014, ALJ Colwell issued a Prehearing Conference Order, and the Prehearing Conference was set in this matter for March 26, 2014 at 1:00 pm. The OCA files this prehearing memorandum in accordance with ALJ Colwell's Prehearing Conference Order.

III. ISSUES AND SUB-ISSUES

The OCA filed a Notice of Intervention in this proceeding to review PPL's Supplement Nos. 139 and 140 to ensure that they are just and reasonable, and lawful under the Public Utility Code. The OCA will review Supplement Nos. 139 and 140 to ensure the following:

- a. that the adjustments to ACR-1 and ACR-2 are proper; and
- b. that the rates proposed by the Company are otherwise just and reasonable and not unduly discriminatory or excessive.

The OCA reserves the right to raise additional issues during the course of this proceeding and as discovery progresses.

IV. WITNESSES

The OCA has not contracted a consultant to assist in this proceeding at this time. However, the OCA reserves the right to call witnesses, if necessary. As soon as the OCA has determined whether a witness or witnesses will be necessary for any portion of its case, all parties of record will be notified.

V. SERVICE ON THE OFFICE OF CONSUMER ADVOCATE

The OCA will be represented in this case by Amy E. Hirakis and Aron J. Beatty.

Two copies of all documents should be served on the OCA as follows:

Amy E. Hirakis
Aron J. Beatty
Assistant Consumer Advocates
Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
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E-Mail: ABeatty@paoca.org
AHirakis@paoca.org

As a courtesy, the OCA requests that all electronic correspondence be copied to Cammie Shoen (cshoen@paoca.org).

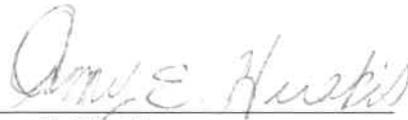
VI. SETTLEMENT

The OCA is willing to engage in settlement discussions with the Parties at the appropriate time.

VII. PROPOSED SCHEDULE

The OCA supports the procedural schedule proposed in the March 11, 2014 Prehearing Conference Order.

Respectfully Submitted,



Amy E. Hirakis
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PA Attorney I.D. # 310094
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Counsel for:
Tanya J. McCloskey
Acting Consumer Advocate

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Dated: March 21, 2014

180891

CERTIFICATE OF SERVICE

Re: PP&L Industrial Customer Alliance v. PPL Electric Utilities Corporation
Docket No. C-2013-2398442

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Prehearing Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 21st day of March 2014.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Johnnie Simms, Esq.
Pa. Public Utility Commission
Bureau of Investigation & Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265

SERVICE BY E-MAIL & FIRST CLASS MAIL

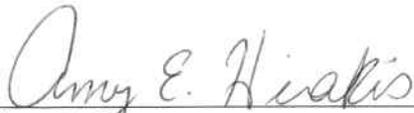
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