



COMMONWEALTH OF PENNSYLVANIA

March 21, 2014

E-FILED

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

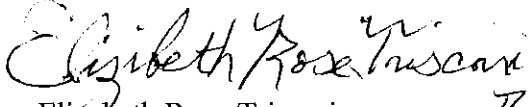
**Re: PP&L Industrial Customer Alliance v. PPL Electric Utilities Corporation
Docket No. C-2013-2398440 & C-2013-2398442**

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,


Elizabeth Rose Triscari *RLS*
Assistant Small Business Advocate
Attorney ID No. 306921

Enclosures

cc: Parties of Record
Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PP&L Industrial Customer Alliance	:	
	:	
v.	:	Docket No. C-2013-2398440
	:	
PPL Electric Utilities Corporation	:	
	:	
PP&L Industrial Customer Alliance	:	
	:	
v.	:	Docket No. C-2013-2398442
	:	
PPL Electric Utilities Corporation	:	

**OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers 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. 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 this matter is Assistant Small Business Advocate Elizabeth Rose Triscari. Please address all correspondence as follows:

Elizabeth Rose Triscari, Esquire
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, Pennsylvania 17101

(717) 783-2525
(717) 783-2831 (fax)
etriscari@pa.gov

II. PROCEDURAL BACKGROUND

On October 22, 2013, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) filed Supplement No. 139 to PPL Tariff – Electric Pa. P.U.C. 201 at Docket No. M-2009-2093216, which was subsequently assigned to Docket No. M-2013-2399549 (“Supp. No. 139”). On the same date, PPL Electric filed Supplement No. 140 to PPL Tariff – Electric Pa. P.U.C. 201 at Docket No. M-2012-2334388, which was subsequently assigned to Docket No. M-2013-2389551 (“Supp. No. 140”). The OSBA filed a Notice of Intervention at Docket Nos. M-2013-2399549 and M-2013-2389551 on November 6, 2013.

PP&L Industrial Customer Alliance (“PPLICA”) filed complaints against Supp. No. 139 and Supp. No. 140 on December 23, 2013, which were assigned to Docket Nos. C-2013-2398440 and C-2013-2398442, respectively.¹

PPL Electric filed an answer to PPLICA’s complaints on January 16, 2014.

An Initial Prehearing Notice was issued on March 10, 2014, scheduling a prehearing conference on this proceeding for March 26, 2014. Administrative Law Judge (“ALJ”) Susan D. Colwell entered a Prehearing Conference Order on March 11, 2014. The OSBA submits this prehearing memorandum in accordance with that order.

¹ The OSBA is filing Notices of Intervention at Docket Nos. C-2013-2398440 and C-2013-2398442 concurrently with this Prehearing Memorandum.

III. WITNESS

Assisting in the development and presentation of the OSBA's position 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

IV. IDENTIFICATION OF ISSUES

After initial review of Supp. No. 139 and Supp. No. 140, the OSBA has no objections to these filings. The OSBA is participating in this case primarily to monitor the proceedings to ensure that the interests of Small C&I customers of PPL Electric are adequately represented and protected.

The OSBA reserves the right to pursue additional issues as they may arise throughout the course of the proceeding.

IV. SERVICE OF DOCUMENTS

The OSBA agrees to accept electronic mail delivery of documents on the due date as satisfying the in-hand requirement, *provided that such documents are followed by hard copy delivery to OSBA by first class mail*. Service by electronic mail only is not acceptable. The OSBA requests that such hard copies are also provided to its witness identified above.

In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. The OSBA also

requests that all parties serve an electronic copy of all interrogatory responses upon the OSBA and the OSBA witness identified above.

V. SETTLEMENT

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

VI. PROCEDURAL SCHEDULE

The OSBA has no conflicts with the procedural schedule proposed in the Prehearing Conference Order.

Respectfully submitted,



Elizabeth Rose Triscari
Attorney ID No. 306921
Assistant Small Business Advocate

For:

John R. Evans
Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Dated: March 21, 2014

**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	:	

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:

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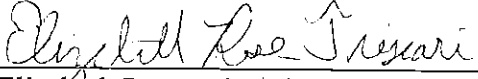
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Date: March 21, 2014


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