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April 11, 2014

VIA ELECTRONIC FILING

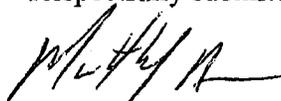
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation for Approval of a New Pilot
Time-of-Use Program - Docket No. P-2013-2389572**

Dear Secretary Chiavetta:

Enclosed for filing is PPL Electric Utilities Corporation's Statement in Support of Joint Petition for Partial Settlement for the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Matthew J. Agen

MJA/jl
Enclosures

cc: Honorable Susan D. Colwell
Honorable Joel H. Cheskis
Certificate of Service

**CERTIFICATE OF SERVICE
(Docket No. P-2013-2389572)**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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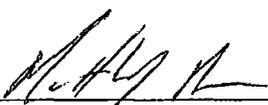
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Date: April 11, 2014



Matthew J. Agen

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of a New Pilot Time-of-Use : Docket No. P-2013-2389572
Program :
:

**PPL ELECTRIC UTILITIES CORPORATION'S
STATEMENT IN SUPPORT OF
JOINT PETITION FOR PARTIAL SETTLEMENT**

TO THE HONORABLE JOEL CHESKIS AND THE HONORABLE SUSAN D. COLWELL, ADMINISTRATIVE LAW JUDGES:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby submits this Statement in Support of the Joint Petition for Partial Settlement (“Settlement”) entered into by PPL Electric, the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), the Sustainable Energy Fund (“SEF”), and Direct Energy Services, LLC (“Direct Energy”) (collectively, the “Joint Petitioners”).¹ The Settlement, if approved, resolves all issues among the parties to the above-captioned proceeding concerning PPL Electric’s new Pilot Time-of-Use (“TOU”) Program, except for the net metering issue raised by DCIDA, which will be the subject of separate briefs filed by the parties.² For the reasons set forth below, the Settlement is just and reasonable and should be approved without modification.

¹ PP&L Industrial Customer Alliance (“PPLICA”), Interstate Gas Supply, Inc. (“IGS”) and FirstEnergy Solutions Corporation (“FES”) do not oppose the Joint Petition for Partial Settlement.

² Additionally, the partial Settlement does not resolve the issues raised by OSBA in its initial brief filed on March 21, 2014, in which OSBA recommends that the Commission terminate the current Small C&I TOU rate when an order is entered in this proceeding.

I. INTRODUCTION

PPL Electric provides electric distribution, transmission, and provider of last resort services to approximately 1.4 million customers in a certificated service territory that spans approximately 10,000 square miles in all or portions of 29 counties in eastern and central Pennsylvania. PPL Electric is a “public utility” and an “electric distribution company” as those terms are defined under the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102 and 2803.

On August 23, 2013, PPL Electric filed a Petition requesting the Pennsylvania Public Utility Commission (“Commission”) approval of a new Pilot TOU Program, which will replace the currently effective TOU rates. PPL Electric filed its Petition pursuant to 52 Pa. Code § 5.41 and in compliance with the Commission’s Order in *Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015*, Docket Nos. P-2012-2302074, *et al.* (Order Entered May 23, 2013) (“May 23 Order”), which required the Company to file a new TOU rate proposal on or before August 23, 2013.

Previously, on May 1, 2012, PPL Electric submitted a TOU proposal as part of its Default Service Program and Procurement Plan for the period June 1, 2013 through May 31, 2015 (“DSP 2013-2015”). In its January 24, 2013 Order, in the DSP 2013-2015 proceeding, the Commission approved, with modification, PPL Electric’s default service plan. *Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015*, Docket No. P-2012-2302074 (Order Entered January 24, 2013) (“January 24 Order”). Regarding TOU rate issues, the Commission did not approve PPL Electric’s as-filed TOU plan or an alternative proposal presented during the DSP

2013-2015 proceeding. In the January 24 Order, the Commission stated that PPL Electric should schedule a collaborative with interested stakeholders to discuss and resolve any issues regarding the development and implementation of a TOU rate option. Pursuant to the January 24 Order, PPL Electric initiated a collaborative and discussions with the parties regarding potential TOU program alternatives.

On March 25, 2013, as part of a compliance filing, PPL Electric requested authority to continue its currently effective TOU rate option until the Commission approves a successor program. The Commission's May 23 Order approved PPL Electric's request.

On August 23, 2013, PPL Electric filed its petition for approval of a new Pilot TOU Program ("August 23, 2013 Petition"). Under the terms of the proposed Pilot TOU Program, the Company would provide a TOU rate option to customers in its tariff, but would rely on the retail market and electric generation suppliers ("EGSs") to provide actual TOU service to customers. Retail EGSs that would choose to participate in the Pilot TOU Program would offer TOU rate options and provide the TOU service to customers in PPL Electric's service territory. PPL Electric's proposal would become part of the Company's retail tariff once approved by the Commission.

The Company filed a form of tariff on September 9, 2013, at Docket No. P-2012-2302074, that incorporated the proposed Pilot TOU Program. On September 6, 2013, SEF filed an Answer to the August 23, 2013 Petition. On September 12, 2013, CAUSE-PA filed an Answer to the August 23, 2013 Petition. On September 12, 2013, OCA filed an Answer to the August 23, 2013 Petition. The ALJs issued a Prehearing Conference Order on October 4, 2013, scheduling a prehearing conference for this proceeding for October 21, 2013. On October 17, 2013, DCIDA filed a petition to intervene. Prehearing conference memoranda were submitted

by PPL Electric, CAUSE-PA, Direct Energy, DCIDA, FES, IGS, PPLICA, SEF, OCA, and OSBA.

On October 21, 2013, the Initial Prehearing Conference was held. On October 25, 2013, the ALJs issued a Scheduling Order. The parties filed direct, rebuttal, surrebuttal, and rejoinder testimony, as applicable, in accordance with the established litigation schedule.

A significant amount of information was supplied by PPL Electric both formally in response to interrogatories as well as informally through settlement discussions. The Joint Petitioners held several settlement conferences and exchanged settlement proposals and counter-proposals. These efforts resulted in a partial settlement in principle that resolves all issues, except for the net metering issued raised by DCIDA and the Small C&I TOU rate issue raised by OSBA.

At the hearing held on February 26, 2014, in this proceeding, PPL Electric advised the ALJs of the partial settlement in principle that resolves all issues in this proceeding, except for the net metering issue raised by DCIDA.

As explained in detail below, the Settlement provides for certain modifications to the Company's proposed Pilot TOU Program.

II. COMMISSION POLICY FAVORS SETTLEMENT

Commission policy promotes settlements. *See* 52 Pa. Code § 5.231(a). Settlements lessen the time and expense the parties must expend litigating a case and, at the same time, conserve administrative resources. The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding. *See* 52 Pa. Code § 69.401. In order to approve a settlement, the Commission must determine that the proposed terms and conditions are in the public interest. *Pa. P.U.C. v. Peoples TWP LLC*, Docket Nos. R-2013-23355886, *et al.* (Order Entered Dec. 19, 2013); *Warner v. GTE North*,

Inc., Docket No. C-00902815 (Order Entered Apr. 1, 1996); *Pa. P.U.C. v. C.S. Water and Sewer Assocs.*, 74 Pa. P.U.C. 767, 771 (1991). For the reasons set forth in this Statement in Support of Settlement, PPL Electric believes that the Settlement is just, reasonable, and in the public interest; therefore, it should be approved without modification.

III. THE SETTLEMENT IS IN THE PUBLIC INTEREST

This Settlement was achieved by the Joint Petitioners after an extensive investigation of the Company's proposed Pilot TOU Program, including informal and formal discovery and the distribution of direct, rebuttal, surrebuttal, and rejoinder testimony. The Settlement reflects a fair and reasonable compromise of the Joint Petitioners' interests in this proceeding. Approval of the Settlement is in the public interest because the Settlement, if approved, will enable EGSs to offer TOU rates to customers in PPL Electric's service territory. The Settlement also establishes several education and reporting requirements to aid consumers in deciding whether to enroll in a TOU offering and to assist the Commission in evaluating the Pilot TOU Program. Moreover, the fact that the Joint Petitioners reached an agreement on the issues in this proceeding indicates that the Settlement is in the public interest and should be approved. Further, approval of this Settlement will reduce the administrative burdens on the Commission and avoid litigation expenditures because it resolves all of the issues in this proceeding, except the net metering issue raised by DCIDA and the Small C&I TOU rate issue raised by OSBA, without the need for a formal administrative adjudication.

Importantly, the Settlement paves the way for ending the current frozen TOU rates, which do not reflect the cost of providing the service or market conditions. The currently effective TOU rates have been in effect since 2011. Over the past several years, PPL Electric has endeavored to implement a new TOU program to replace the existing rates. Unfortunately, these attempts have not been successful for various reasons. The unique situation of the rates

remaining in place since 2011 has resulted in the current TOU rates (on- and off-peak) being higher than the Price-to-Compare. The Settlement provides that the current TOU rates will no longer be available once the new Pilot TOU Program is implemented.

A. PILOT TOU PROGRAM OVERVIEW

PPL Electric will provide a TOU rate option to customers in its tariff; however, it will utilize the retail market and EGSs to satisfy its statutory obligation to offer TOU service to its default service customers. Settlement ¶ 19; PPL Electric St. 1 at 6:8-9. Retail EGSs that choose to participate in the Pilot TOU Program will offer TOU rate options and provide the TOU service to customers in PPL Electric's service territory. Settlement ¶ 20; PPL Electric St. 1 at 6:12. The TOU rate options offered by the participating EGSs will consist of a rate that varies with time of use, but not as frequently as each hour, and includes off-peak and on-peak periods, with rates during off-peak periods being lower than rates during on-peak periods. Settlement ¶ 25; PPL Electric St. 1 at 8:16 and 9:2-7. To participate in the Pilot TOU Program, EGSs must execute a binding participation form ("Participation Form"). Settlement ¶ 22; PPL Electric St. 1 at 6:19. The Participation Form describes the Pilot TOU Program and an EGS's responsibilities under the program. Settlement ¶ 23. EGSs also are responsible for publicizing and marketing their participation in the Pilot TOU Program and the TOU rate options provided thereunder. Settlement ¶ 30; PPL Electric St. 1 at 10:2-4.

The Settlement is consistent with the Commission's guidance that PPL Electric utilize the retail market and EGSs to satisfy its statutory obligation to offer TOU service to its default service customers. In *Petition of PPL Elec. Utils. Corp. for Approval of a Default Serv. Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015*, Docket No. P-2012-2302074 (Order Entered January 24, 2013), the Commission encouraged PPL Electric to give further consideration to a retail bid process to meet its TOU rate requirement. The

Commission explained that reliance on EGSs to provide TOU service is not prohibited by Act 129 and a default service provider can utilize EGSs to satisfy its TOU rate requirement. *Id.* at p. 115. Therefore, the Settlement is in the public interest because it complies with the Commission's advice to use an EGS and it promotes development of retail competitive market.

B. PILOT TOU PROGRAM DESIGN

A participating EGS also will define the on- and off-peak rates that it will offer to customers. Settlement ¶ 25; PPL Electric St. 1 at 8:16-17. The Joint Petitioners have agreed under the Settlement that the Company will include a provision in the Participation Form that states that an EGS's off-peak/discounted pricing hours cannot include 2 p.m. to 6 p.m., Monday through Friday, excluding PJM holidays during the summer, *i.e.*, June, July, and August. Settlement ¶ 25.

Under PPL Electric's initial proposal EGSs had flexibility to design TOU rate options that they believed would work in the market place. A participating EGS would define the on- and off-peak hours and the on- and off-peak rates that it would offer to customers. OCA raised issues regarding the open ended and flexible nature of the initial proposed program. OCA explained that the TOU on-peak and off-peak rates should be designed to provide a sufficient incentive to encourage participating customers to shift their usage of electricity from high load, high cost hours to lower load, lower cost hours. OCA St. 1 at 6:22-24. OCA advocated that the definition of on-peak hours should provide a reasonable opportunity for program participation and not serve as a disincentive to changing usage patterns. *See* OCA St. 1 at 7:4-6. OCA was concerned because under the initial proposal, criteria was not set to ensure that the EGS TOU prices would be designed to achieve the objectives of the TOU rate program. *See* OCA St. 1 at 8:22-24. In order to address OCA's concern, the parties have agreed to limit the off-peak/discounted pricing hours. Specifically, an EGS's off-peak/discounted pricing hours cannot

include 2 p.m. to 6 p.m., Monday through Friday, excluding PJM holidays during the summer, *i.e.*, June, July, and August. This provides that the EGSs will have flexibility to design the rate option, but provides that non-peak hours cannot occur during hours of highest peak demand. The revision agreed to by the parties addresses OCA's concern without unduly limiting an EGS's flexibility to design TOU rates.

C. PILOT TOU PROGRAM EDUCATION AND REPORTING

Parties identified and suggested several additional customer education initiatives and reporting requirements in this proceeding. *See, e.g.*, OCA St. 2 at 14:19-15:2, 15:6-8; SEF St. 1 at 9:1-13, 10:1-12.

Under the Settlement, PPL Electric has agreed to undertake additional education efforts, including: (1) providing additional information on its TOU website, including a frequently asked questions ("FAQ") section; (2) providing a detailed discussion concerning how customers can determine the effect of an EGS's TOU rate under the Pilot TOU Program on their monthly bills; (3) giving information about the Pilot TOU Program to PPL Electric's Customer Service Representatives; (4) preparing a fact sheet with tips and ideas on how to shift load; and (5) providing interested parties the opportunity to review and comment on these additional education efforts. Settlement ¶¶ 34, 36-39; PPL Electric St. 1-R at 7:5-7.

In addition, the Joint Petitioners have agreed to additional reporting requirements. First, in addition to the reporting requirements already outlined in the Participation Form, a provision will be added that requires a participating EGS to provide, in its quarterly report to PPL Electric, the number of customers that participated in its rate offering under the Pilot TOU Program during the previous quarter. Settlement ¶ 27; *see* SEF St. 1 at 10:2-12. Moreover, a provision will be added that requires a participating EGS to provide, in its quarterly reports, the EGS's

aggregate monthly on- and off-peak load information for customers participating in the Pilot TOU Program, per rate schedule. *Id.*

PPL Electric also agreed to additional reporting requirements under the Settlement. The Company will provide a quarterly status report on the Pilot TOU Program to the parties in this proceeding. Settlement ¶ 40. Further, in its report submitted to the Commission under 66 Pa. C.S. § 2807(f)(5), PPL Electric will provide an analysis of the information it receives from the EGSs' quarterly status reports concerning the number of customers that participated in EGSs' rate offerings under the Pilot TOU Program during the previous quarter and the EGSs' aggregate monthly on- and off-peak load information for customers participating in the Pilot TOU Program, per rate schedule. *Id.*

The Company believes that the reporting requirements contained in the Settlement will provide the parties in this proceeding and the Commission sufficient information to better evaluate the Pilot TOU Program. Moreover, the Company will continue to report to the Commission pursuant to 66 Pa. C.S. § 2807(f)(5). The Settlement's reporting requirements enable the parties to receive the information sought during this proceeding while not being overly burdensome for the Company.

D. CUSTOMER ASSISTANCE PROGRAM / ONTRACK CUSTOMER PARTICIPATION

A customer's participation in the Pilot TOU Program is voluntary, and the customer selects the EGS rate option. All Residential and Small C&I customers, except for customers in the Company's low-income customer assistance program ("CAP"), will be eligible to participate in the Pilot TOU Program for the term of the program. Under the Settlement, CAP customers will be excluded from participating in the Pilot TOU Program, which, as proposed, will end on May 31, 2015. Settlement ¶ 32. As originally filed in the August 23, 2013 Petition, PPL

Electric's proposed Pilot TOU Program would have permitted customers in the Company's CAP, known as "OnTrack," to participate in the program. PPL Electric is concerned by the high number of OnTrack customers that are paying for generation that exceeds the Company's Price-to-Compare. PPL Electric St. 3-R at 6:1; CAUSE-PA St. 1 at 7:5. Therefore PPL Electric, CAUSE-PA and the other Joint Petitioners have agreed to exclude CAP customers from participating in the Pilot TOU Program in an effort to resolve issues in this proceeding.

The Settlement in this proceeding, regarding CAP customers, is consistent with other TOU plans. In *Petition of PECO Energy Company for Approval of its Initial Dynamic Pricing and Customer Acceptance Plan*, Docket No. M-2009-2123944 (Order Entered April 15, 2011), at p. 6, the Commission approved a settlement regarding PECO's TOU plan and expressly discussed the fact that only residential customers not enrolled in CAP will be eligible for TOU rates. Moreover, despite this restriction, the Commission found that "[s]ince all customers with a smart meter may participate in the CPP and TOU rate options proposed by the instant Petition and since PECO will offer TOU rates and real-time price plans for all customers with smart meters concurrent with the system-wide deployment of smart meters, we find that the Petition complies with the availability requirement of 66 Pa. C.S. § 2807(f)(5)." Therefore, even though PECO expressly excluded CAP customers from its TOU plan, the Commission, nonetheless held that PECO was in compliance with the requirements of 66 Pa. C.S. § 2807(f)(5), which requires default service providers to offer TOU rates to all customers that have been provided with smart meter technology. Therefore, it is permissible for the Company to exclude CAP customers from the TOU program without violating 66 Pa. C.S. § 2807(f)(5).

Moreover, the participation of CAP customers in retail programs is an evolving issue both at the Commission and in the courts. For example, in *Petition of PECO Energy Company*

for Approval of its Default Service Plan, at Docket No. P-2012-2283641 (Order Entered January 24, 2014), the Commission explained while approving, with modifications, PECO's CAP Shopping Plan, that:

By removing the barrier to customer choice and allowing CAP customers the freedom to choose their EGS, as contemplated by the Electric Competition Act, we are affording PECO's CAP customers the same opportunities and benefits currently available to every other PECO customer.

In the above quotation, the Commission clearly expressed its desire that CAP customers be treated like any other customer and be permitted to participate in available programs. However, CAUSE-PA appealed the order in Docket No. P-2012-2283641 to the Commonwealth Court of Pennsylvania and in March the court issued a stay of the implementation PECO's CAP Shopping Plan and the above cited order while the appeal is pending. *See* Order of Judge Leadbetter, filed March 28, 2014 in No. 445 C.D. 2014.

PPL Electric does not want to delay the implementation of the Pilot TOU Program while issues related to CAP customer participation in retail programs are addressed by the court. As stated above, in the Settlement the parties, including CAUSE-PA and an EGS, agreed to exclude the Company's low-income CAP customers from the Pilot TOU Program for the term of the program. The Pilot TOU Program ends on May 31, 2015. While the Commission prefers that CAP customers not be excluded from available programs, the Company believes that exclusion for the term of the Pilot TOU Program is acceptable. First exclusion is appropriate as a method of resolving the issues raised in this proceeding and, second, it allows time for the broader issues related to CAP customer participation to be addressed by the court.

E. EXISTING TOU CUSTOMER PARTICIPATION

Pursuant to the Settlement, PPL Electric's currently effective TOU program will no longer be available to new applicants as of the effective date of the new tariff supplement

implementing the new Pilot TOU Program. Settlement ¶ 41. Eligible customers may move directly to the Pilot TOU Program, provided that the customer chooses to participate. Settlement ¶ 42. If a current TOU customer does not choose to participate in the Pilot TOU Program or does not choose to purchase generation supply from an EGS, the customer will be returned to PPL Electric's fixed price default service within a specified time frame. Settlement ¶ 42. PPL Electric will also return CAP participants to default service. Settlement ¶ 42.

PPL Electric will send a letter to existing TOU customers 45 days prior to the start of the Pilot TOU Program to notify them that the current TOU rate will terminate. Settlement ¶ 43. The letter also will explain that if the customers do not choose to participate in the Pilot TOU Program or do not choose to purchase generation supply from an EGS, they will be transferred to PPL Electric's fixed price default service by a certain date. *Id.* PPL Electric will only maintain the current TOU rates in effect until each customer's first meter read date after the implementation of the Pilot TOU Program, at which time the customer will be returned to fixed price default service if the customer has not elected to receive service from an EGS. Settlement ¶ 44.

PPL Electric is obligated under 66 Pa. C.S. § 2807(f)(5) and related Commission precedent to offer a TOU rate. The Settlement provides a transition that both allows the current TOU rates to terminate and permits the Company to comply with Section 2807(f)(5) and continually offer a TOU rate. Moreover, the Company has proposed a detailed implementation plan for the Pilot TOU program that includes ending the current TOU rates and permits customers to either transition to fixed-price default service or EGS service after sufficient notice. The transition and the implementation schedule (discussed below) provide adequate notice to customers and also provide for the lead time required to implement the Pilot TOU Program.

F. IMPLEMENTATION SCHEDULE

Under the Settlement, PPL Electric will make the Pilot TOU Program effective 90 days after the Commission issues a final order approving the Pilot TOU Program. Settlement ¶ 46. This shortens the implementation schedule initially proposed and provides for a faster transition to the Pilot TOU Program and termination of the current TOU rates. *See* PPL Electric St. 2 at 3:13-14.

G. TOU CONTINGENCY PLAN

Prior to the Settlement, several parties proffered modifications to PPL Electric's proposed contingency TOU plan or a new alternative contingency TOU plan. *See, e.g.*, OCA St. 2 at 17:5-15; OCA St. 1 at 10:27-11:3; SEF St. 1 at 13:1-6, 13:12-29.

Pursuant to the Settlement, PPL Electric has withdrawn its proposed contingency TOU plan. Instead, if no EGSs execute the Pilot TOU Program Participation Form at the initiation of the program, or if all of the participating EGSs opt-out of the program or default on the program's requirements, PPL Electric will expeditiously seek approval of a new subsequent TOU proposal and request that the replacement plan be made effective within 60 days. Settlement ¶ 48. If no EGS qualifies to participate in the Pilot TOU Program or it appears that any or all of the participating EGSs will choose to opt out of the program, PPL Electric will endeavor to work with an interested but non-qualifying EGS or an opting out EGS(s) to keep them in the program prior to engaging in the plan described below. *Id.*

The Company's subsequent TOU proposal, as discussed above, will include the following characteristics. First, the Company will solicit, through a request for proposal ("RFP") process, a single supplier to provide TOU service to customers. Settlement ¶ 49. The program also will be a summer-only program (including the months of June, July, and August), where the "on-peak" period will be from 2 p.m. to 6 p.m., Monday through Friday, excluding PJM

holidays. *Id.* All other hours during this summer period will be defined as off-peak hours. *Id.* Moreover, the RFP process will determine the summer “on-peak” and “off-peak” rates. *Id.* During the non-summer months, the rate will be the then current Price-to-Compare. *Id.* The Company also will propose that CAP customers be eligible to participate in the subsequent TOU proposal. *Id.* Furthermore, TOU rates provided through the RFP will not be reconciled, but PPL Electric will be permitted to fully recover the costs of implementing the subsequent TOU proposal in its General Supply Charge. *Id.* Lastly, parties will have the right to challenge the subsequent TOU proposal. *Id.*

Pursuant to Section 2807(f)(5) of the Code, PPL Electric must offer a TOU rate option to its customers. Therefore, the Settlement provides a framework that will be followed with regard to a contingency plan in the event that the Pilot TOU Program is not successful. Moreover, while elements of the contingency plan are discussed in the Settlement, parties retain the right to challenge the subsequent TOU proposal if it is submitted by the Company.

IV. CONCLUSION

WHEREFORE, for the reasons explained above, and those set forth in the Settlement, the terms of the Settlement are in the public interest, and the Administrative Law Judges and the Commission should approve the Settlement without modification. As illustrated above, the Company believes that the Settlement is fair, just, reasonable, non-discriminatory, lawful, and in the public interest.

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Of Counsel:

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Date: April 11, 2014

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