



COMMONWEALTH OF PENNSYLVANIA

May 28, 2014

**E-FILED**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P. O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2015 through May 31, 2017  
Docket No. P-2014-2417907**

Dear Secretary Chiavetta:

I am delivering for filing today the originals of the Answer and Verification, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

Two copies have been served today on all known parties in this proceeding. A Certificate of Service to that effect is enclosed.

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

Sincerely,

A handwritten signature in cursive script that reads "Steven C. Gray 725".

Steven C. Gray  
Assistant Small Business Advocate  
Attorney ID No. 77538

Enclosures

cc: Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation :  
for Approval of a Default Service Program and : Docket No. P-2014-2417907  
Procurement Plan for the Period June 1, 2015 :  
through May 31, 2017 :**

**ANSWER OF THE  
OFFICE OF SMALL BUSINESS ADVOCATE**

Pursuant to 52 Pa. Code § 5.61(a), the Office of Small Business Advocate (“OSBA”) submits this Answer to the Petition of PPL Electric Utilities Corporation (“PPL” or the “Company”) for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2015 through May 31, 2017 (“*Petition*”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on April 18, 2014.

**Responses to the *Petition*'s Numbered Paragraphs**

Introduction

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. The averments of Paragraph 5 contain conclusions of law to which no response is required. By way of further response, Sections 102 and 2803 of the Public Utility Code speak for themselves.

6. The averments of Paragraph 6 contain conclusions of law to which no response is required. By way of further response, the Electricity Generation Customer Choice and Competition Act (“Customer Choice Act”) speaks for itself.

7. The averments of Paragraph 7 contain conclusions of law to which no response is required. By way of further response, the Commission’s Default Service Regulations speak for themselves.

8. The averments of Paragraph 8 contain conclusions of law to which no response is required. By way of further response, the Act 129 of 2008 (“Act 129”) speaks for itself.

9. Admitted, except for those averments of Paragraph 9 which are part of the Company’s request for relief to which no response is required.

10. The averments of Paragraph 10 contain a summary of the Company’s request for relief to which no response is required.

11. The averments of Paragraph 11 contain a summary of the Company’s request for relief to which no response is required.

12. The averments of Paragraph 12 contain a summary of the Company’s request for relief to which no response is required.

13. The averments of Paragraph 13 contain a summary of the Company’s request for relief to which no response is required.

14. The averments of Paragraph 14 contain a summary of the Company’s request for relief to which no response is required.

15. The averments of Paragraph 15 contain a summary of the documents attached to the *Petition*. To the extent a response is required, the averments are denied.

16. The OSBA admits that the Company filed a multipage document titled “PPL Electric Utilities Corporation Direct Testimony” on April 25, 2014. The remaining averments of Paragraph 16 contain a summary of proposed Company testimony. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

17. The averments of Paragraph 17 contain conclusions of law to which no response is required. By way of further response, Act 129, the Commission’s Default Service Regulations, the Commission’s *DSP Policy Statement*, the various Commission Default Service decisions, and the Commission’s *End State Order* all speak for themselves.

18. The averments of Paragraph 18 are requests for relief or conclusions of law to which no response is required.

Legal Standards

19. The averments of Paragraph 19 are requests for relief or conclusions of law to which no response is required.

20. The averments of Paragraph 20 are requests for relief or conclusions of law to which no response is required.

21. The averments of Paragraph 21 are requests for relief or conclusions of law to which no response is required.

22. The averments of Paragraph 22 contain conclusions of law to which no response is required. By way of further response, Section 2807 of the Public Utility Code speaks for itself.

23. The averments of Paragraph 23 contain conclusions of law to which no response is required. By way of further response, 52 Pa. Code § 54.185 speaks for itself.

24. The averments of Paragraph 24 contain conclusions of law to which no response is required. By way of further response, Section 2807 of the Public Utility Code speaks for itself.

25. The averments of Paragraph 25 contain conclusions of law to which no response is required. By way of further response, the AEPS Act, the Commission's regulations, and 52 Pa. Code § 54.182 speak for themselves.

26. The averments of Paragraph 26 are requests for relief or conclusions of law to which no response is required. By way of further response, the Commission's *DSP Policy Statement* and *End State Order* speak for themselves.

27. The averments of Paragraph 27 are requests for relief or conclusions of law to which no response is required.

28. The averments of Paragraph 28 contain a summary of the Company's request for relief to which no response is required.

PPL Electric's Current DSP Program

29. The averments of Paragraph 29 are requests for relief or conclusions of law to which no response is required.

30. Admitted. By way of further response, the January 24, 2013, Commission Order cited by the Company in Paragraph 30 speaks for itself.

31. Admitted.

32. Admitted.

33. Admitted.

34. The averments of Paragraph 34 are admitted in part and denied in part. By way of further response, the OSBA lacks sufficient first-hand knowledge upon which to determine the

truth of whether there is “substantial competition to supply the fixed-price, full-requirements, load-following products.” Therefore, that averment is denied and strict proof thereof is demanded.

35. The averments of Paragraph 35 are a series of self-congratulatory assertions by the Company to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

36. Admitted.

37. The averments of Paragraph 37 are requests for relief to which no response is required.

38. The averments of Paragraph 38 are requests for relief to which no response is required.

Proposed DSP III Program

39. The averments of Paragraph 39 are a series of self-congratulatory assertions by the Company to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

40. The averments of Paragraph 40 contain a summary of the Company’s request for relief to which no response is required.

41. The averments of Paragraph 41 contain a summary of the Company’s request for relief to which no response is required.

42. The averments of Paragraph 28 contain a summary of the Company’s request for relief to which no response is required. By way of further response, the April 11, 2014, Joint Petition for Partial Settlement cited by the Company in Paragraph 42 speaks for itself.

Residential Fixed-Price Procurement and Rate Design

43. Admitted.

44. The averments of Paragraph 44 are requests for relief to which no response is required.

45. The averments of Paragraph 45 are requests for relief to which no response is required.

46. The averments of Paragraph 46 are requests for relief to which no response is required.

47. The averments of Paragraph 47 are requests for relief to which no response is required.

48. The averments of Paragraph 48 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

Small C&I Fixed-Price Procurement and Rate Design

49. The averments of Paragraph 49 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

50. The averments of Paragraph 50 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded. By way of further response, the Commission's *End State Order* speaks for itself.

51. The averments of Paragraph 51 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

52. The averments of Paragraph 52 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

53. The averments of Paragraph 53 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

54. The averments of Paragraph 54 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

55. The averments of Paragraph 55 are requests for relief or conclusions of law to which no response is required.

Large C&I Procurement and Rate Design

56. The averments of Paragraph 56 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

57. The averments of Paragraph 57 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

58. The averments of Paragraph 58 are requests for relief to which no response is required.

59. The averments of Paragraph 59 are requests for relief or to which no response is required.

60. The averments of Paragraph 60 are requests for relief to which no response is required.

61. The averments of Paragraph 61 are requests for relief to which no response is required.

62. The averments of Paragraph 62 are requests for relief to which no response is required.

Time of Use Procurement and Rate Design

63. Admitted. By way of further response, the January 24, 2013, Commission Order cited by the Company in Paragraph 30 speaks for itself.

64. Admitted.

65. Admitted.

66. Admitted.

67. The averments of Paragraph 67 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

68. The averments of Paragraph 68 are requests for relief to which no response is required.

69. Admitted.

70. Admitted.

71. Admitted.

72. Admitted.

73. Admitted.

AEPS Procurement

74. The averments of Paragraph 74 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

75. The averments of Paragraph 75 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

76. The averments of Paragraph 76 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

77. The averments of Paragraph 77 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

DSP III Program Procurements Represent a Prudent Mix of Supplies

78. The averments of Paragraph 78 are requests for relief to which no response is required.

79. The averments of Paragraph 79 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

80. The averments of Paragraph 80 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied

and strict proof thereof is demanded. By way of further response, the OSBA has consistently supported the use of fixed-price, full-requirements, load-following products.

81. The averments of Paragraph 81 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded. By way of further response, the OSBA has consistently supported the use of fixed-price, full-requirements, load-following products.

82. The averments of Paragraph 82 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

83. The averments of Paragraph 83 are requests for relief to which no response is required.

#### DSP III Program RFP Process

84. The averments of Paragraph 84 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

85. The averments of Paragraph 85 are requests for relief or conclusions of law to which no response is required.

86. The averments of Paragraph 86 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

87. The averments of Paragraph 86 are requests for relief to which no response is required.

88. The averments of Paragraph 88 are requests for relief to which no response is required.

89. The averments of Paragraph 89 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

90. The averments of Paragraph 90 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

91. The averments of Paragraph 91 are requests for relief to which no response is required.

92. The averments of Paragraph 92 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

93. The averments of Paragraph 93 are requests for relief or conclusions of law to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

94. The averments of Paragraph 94 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

#### Supply Master Agreement

95. Denied. The Commission's *End State Order* speaks for itself. By way of further response, the OSBA lacks sufficient first-hand knowledge upon which to determine the truth of

whether PPL “actively” participated in any working group. Therefore, that averment is denied and strict proof thereof is demanded.

96. The OSBA lacks sufficient first-hand knowledge upon which to determine the truth of the averments in Paragraph 96. Therefore, those averments are denied and strict proof thereof is demanded.

97. The averments of Paragraph 97 are requests for relief or conclusions of law to which no response is required.

98. The averments of Paragraph 98 contain a summary of a document attached to the Petition. To the extent a response is required, the averments are denied.

#### Third-Party Manager

99. The averments of Paragraph 99 are requests for relief to which no response is required.

100. The averments of Paragraph 100 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

101. The averments of Paragraph 101 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

#### RTO Compliance

102. The averments of Paragraph 103 are requests for relief or conclusions of law to which no response is required. By way of further response, 52 Pa. Code § 54.185 speaks for itself.

103. The averments of Paragraph 103 are requests for relief or conclusions of law to which no response is required.

104. The averments of Paragraph 104 are requests for relief or conclusions of law to which no response is required.

Contingency Planning

105. The averments of Paragraph 105 are requests for relief or conclusions of law to which no response is required. By way of further response, 52 Pa. Code § 54.185 speaks for itself.

106. The averments of Paragraph 106 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

107. The averments of Paragraph 107 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

108. The averments of Paragraph 108 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

Standard Offer Referral Program

109. Denied. To the extent a response is required, the averments of Paragraph 109 are denied and strict proof thereof is demanded.

110. Admitted. By way of further response, the March 2, 2012, Commission Order cited by the Company in Paragraph 110 speaks for itself.

111. The averments of Paragraph 111 are requests for relief to which no response is required.

112. The averments of Paragraph 112 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

113. The averments of Paragraph 113 are requests for relief to which no response is required.

114. The averments of Paragraph 114 are requests for relief to which no response is required.

115. The averments of Paragraph 115 are requests for relief to which no response is required.

116. The averments of Paragraph 116 are requests for relief to which no response is required.

117. The averments of Paragraph 117 are requests for relief to which no response is required.

118. The averments of Paragraph 118 are requests for relief to which no response is required.

119. The averments of Paragraph 119 are requests for relief to which no response is required.

120. The averments of Paragraph 120 are requests for relief to which no response is required.

End State

121. The averments of Paragraph 121 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

122. The averments of Paragraph 122 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

123. The averments of Paragraph 123 are requests for relief to which no response is required. To the extent a response is required, the averments are denied and strict proof thereof is demanded.

Additional Requested Ruling Pursuant to 66 Pa. C.S. § 2102

124. The averments of Paragraph 124 are requests for relief or conclusions of law to which no response is required.

125. The averments of Paragraph 125 are requests for relief or conclusions of law to which no response is required.

126. The averments of Paragraph 126 are requests for relief or conclusions of law to which no response is required.

127. The averments of Paragraph 127 are requests for relief or conclusions of law to which no response is required.

128. The averments of Paragraph 128 are requests for relief or conclusions of law to which no response is required.

### Waivers

129. The averments of Paragraph 129 are requests for relief or conclusions of law to which no response is required.

130. The averments of Paragraph 130 are conclusions of law to which no response is required. By way of further response, the Commission's *End State Order* speaks for itself

131. The averments of Paragraph 131 are requests for relief or conclusions of law to which no response is required. By way of further response, the OSBA supports the Company's request for waiver of the quarterly PTC requirement.

132. The averments of Paragraph 132 are requests for relief or conclusions of law to which no response is required.

133. The averments of Paragraph 133 are requests for relief or conclusions of law to which no response is required.

### DSP III Program is in the Public Interest

134. The averments of Paragraph 134 are requests for relief to which no response is required.

135. The averments of Paragraph 135 are requests for relief or conclusions of law to which no response is required.

136. The averments of Paragraph 136 are requests for relief or conclusions of law to which no response is required.

137. The averments of Paragraph 137 are requests for relief or conclusions of law to which no response is required.

138. The averments of Paragraph 138 are requests for relief or conclusions of law to which no response is required.

139. The averments of Paragraph 139 are requests for relief to which no response is required.

140. The averments of Paragraph 140 are requests for relief to which no response is required.

141. The averments of Paragraph 141 are requests for relief or conclusions of law to which no response is required.

142. The averments of Paragraph 142 are conclusions of law to which no response is required.

Customer Notice

143. Denied. To the extent a response is required, the averments of Paragraph 143 are denied and strict proof thereof is demanded.

144. Admitted in part and denied in part. The OSBA has received a copy of the Company's filing. The OSBA has no knowledge whether any other party has been served with the Company's filing. Therefore, to the extent a response is required, the averments of Paragraph 109 are denied and strict proof thereof is demanded.

145. Denied. To the extent a response is required, the averments of Paragraph 109 are denied and strict proof thereof is demanded.

146. Denied. To the extent a response is required, the averments of Paragraph 109 are denied and strict proof thereof is demanded.

147. Denied. To the extent a response is required, the averments of Paragraph 109 are denied and strict proof thereof is demanded.

148. The averments of Paragraph 148 are requests for relief to which no response is required.

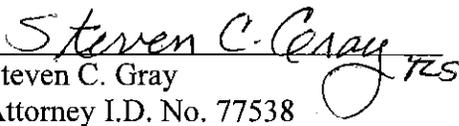
149. The averments of Paragraph 149 are requests for relief or conclusions of law to which no response is required.

**Conclusion**

In view of the foregoing, the Office of Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- A. Direct the Office of Administrative Law Judge to hold hearings on the *Petition* and prepare an initial decision; and
- B. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

  
Steven C. Gray  
Attorney I.D. No. 77538  
Assistant Small Business Advocate

For:  
John R. Evans  
Small Business Advocate

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Dated: May 28, 2014

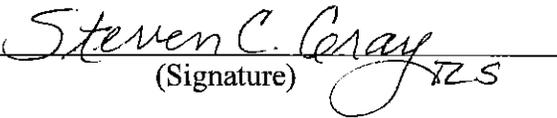
**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation** :  
**for Approval of a Default Service Program and** : **Docket No. P-2014-2417907**  
**Procurement Plan for the Period June 1, 2015** :  
**through May 31, 2017** :

**VERIFICATION**

I, Steven C. Gray, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

Date: May 28, 2014

  
(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation :  
for Approval of a Default Service Program and : Docket No. P-2014-2417907  
Procurement Plan for the Period June 1, 2015 :  
through May 31, 2017 :**

**CERTIFICATE OF SERVICE**

I certify that I am serving two copies of the Answer and Verification, 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:

Hon. Susan D. Colwell  
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AEP Energy, Inc.  
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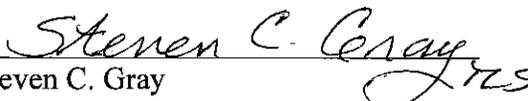
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Dated: May 28, 2014

  
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