

**COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Petition of PPL Electric Utilities Corporation</b>	:	<b>Docket No. P-2014-2417907</b>
<b>For Approval of a Default Service Program</b>	:	
<b>And Procurement Plan for the Period of</b>	:	
<b>June 1, 2015 through May 31, 2017</b>	:	
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**PREHEARING MEMORANDUM OF  
EXELON GENERATION COMPANY, LLC**

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Before the Pennsylvania Public Utility Commission (the “Commission”), pursuant to 52 Pa. Code §§ 5.222, Intervenor Exelon Generation Company, LLC (“ExGen”), by its undersigned counsel, hereby respectfully submits this Prehearing Memorandum:

**I. INTRODUCTION**

On April 18, 2014, PPL Electric Utilities Corporation (“PPL”) filed a Petition for Approval of a Default Service Program and Procurement Plan (“Plan”) for the Period June 1, 2015 Through May 31, 2017 pursuant to Section 2807(e) of the Public Utility Code.

**II. IDENTIFICATION OF ISSUES**

ExGen is at this time still formulating its position on the issues presented by the Plan. Based on a preliminary review of the Plan, ExGen expects that potential issues in this proceeding will include but not be limited to: (i) the manner in which the PPL is proposing to conduct default service procurements for various customer classes under the Plan; (ii) the manner in which the Plan hinders or supports the development of competition in PPL’s service territory, while preserving benefits from well-developed default service offerings for customers; (iii) whether the Plan is consistent with Act 129, the Commission’s recent orders regarding the retail markets, and other applicable rules; and (iv) default service supply contract and other operational

and data issues and their impact on wholesale suppliers. ExGen reserves the right to address other issues as it deems appropriate.

### **III. WITNESSES**

ExGen reserves the right to present in this proceeding direct, rebuttal, and surrebuttal fact and expert testimony, to the extent it deems necessary. ExGen expects to present expert testimony by:

Lael E. Campbell  
Director, Government and Regulatory Affairs  
Exelon Corporation  
101 Constitution Ave, NW  
Washington, DC 20004  
Phone: 410-470-3439  
Mobile: 202-568-1589  
[lael.campbell@exeloncorp.com](mailto:lael.campbell@exeloncorp.com)

In the event ExGen chooses a different expert witness, it will notify the Administrative Law Judge and all parties as soon as practicable. Once discovery has begun and the positions of all parties to this proceeding have been made known, ExGen will notify the Administrative Law Judge and all parties of the identities of any additional witnesses it intends to call.

### **IV. SERVICE ON EXGEN**

ExGen consents to accept electronic delivery documents on the deadlines for their filing.

ExGen respectfully requests that service be made to the following individuals:

Lael E. Campbell  
Director, Government and Regulatory  
Affairs  
Exelon Corporation  
101 Constitution Ave, NW  
Washington, DC 20004  
Phone: 410-470-3439  
Mobile: 202-568-1589  
[lael.campbell@exeloncorp.com](mailto:lael.campbell@exeloncorp.com)

Divesh Gupta  
Asst. General Counsel  
Exelon Business Services Corp.  
100 Constellation Way, Suite 500C  
Baltimore, MD 21202  
Telephone: (410) 470-3158  
Facsimile: (443) 213-3556  
[divesh.gupta@constellation.com](mailto:divesh.gupta@constellation.com)

**V. CONCLUSION**

WHEREFORE, for all the foregoing reasons, Exelon Generation Company, LLC respectfully requests that its Prehearing Memorandum be entered in to the record of this proceeding.

Respectfully submitted,

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Divesh Gupta  
(PA Bar # 307892)  
Asst. General Counsel  
Exelon Business Services Corp.  
100 Constellation Way, Suite 500C  
Baltimore, MD 21202  
Telephone: (410) 470-3158  
Facsimile: (410) 213-3556  
[divesh.gupta@constellation.com](mailto:divesh.gupta@constellation.com)

*Counsel to Intervenor Exelon Generation Company,  
LLC.*

Dated: May 30, 2014