



THOMAS, NIESEN & THOMAS, LLC

Attorneys and Counsellors at Law

CHARLES E. THOMAS, III
Direct Dial: 717.255.7611
cet3@tntlawfirm.com

June 3, 2014

VIA ELECTRONIC FILING

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

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

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Noble Americas Energy Solutions LLC is its Prehearing Memorandum in the above-referenced matter. Copies of the Prehearing Memorandum are being served upon the persons and in the manner set forth on the certificate of service attached to it.

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

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Charles E. Thomas, III

Encl.

cc: Certificate of Service (w/encl.)
Becky Merola (w/encl.)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**PREHEARING MEMORANDUM OF
NOBLE AMERICAS ENERGY SOLUTIONS LLC**

AND NOW, comes Noble Americas Energy Solutions LLC (“Noble”), by its attorneys, and submits this Prehearing Memorandum in accordance with the Prehearing Order (First Prehearing Order) of Administrative Law Judge Susan D. Colwell, dated May 5, 2014, and in connection with the Initial Prehearing Conference scheduled to be held in the above-captioned matter on June 5, 2014.

I. Introduction

On or about April 18, 2014, PPL Electric Utilities Corporation (“PPL”) filed a petition seeking Commission approval of its third Default Service Program and Procurement Plan (“DSP III Program”) to establish terms and conditions under which PPL will acquire and supply default service for the period from June 1, 2015 through May 31, 2017.

Notice of the filing of the petition was published in the *Pennsylvania Bulletin* on May 10, 2014. *See* 44 Pa.B. 2832. As presented in the published notice, petitions to intervene in the proceeding are to be filed with the Commission on or before May 30, 2014.

On May 29, 2014, Noble filed a Petition to Intervene (“Petition”) in this proceeding. Noble incorporates by reference the statements and information provided in its Petition and respectfully requests that Judge Colwell grant its intervention.

II. Counsel for Noble

The name, business addresses, telephone and fax numbers, and email address of Noble's counsel are:

Charles E. Thomas III, Esq.
THOMAS, NIESEN & THOMAS, LLC
212 Locust Street, Suite 600
P.O. Box 9500
Harrisburg, PA 17108-9500
Tel: (717) 255-7611
Fax: (717) 236-8278
cet3@tntlawfirm.com

III. Noble's Participation

Noble will participate in this proceeding as an active party. It requests that copies of all discovery responses, including any discovery responses that may have already been distributed, be provided to counsel for Noble. As necessary and appropriate, Noble will conduct its own discovery, present testimony, cross examine witnesses, and submit briefs for Commission consideration.

IV. Issues

Noble is in the process of identifying the issues it may pursue in this proceeding. Upon completing its review of PPL's filing and direct testimony, Noble may support, oppose or propose modifications to PPL's proposed DSP III Program. Noble reserves the right to present its position in accordance with the litigation schedule which will be finalized at the Prehearing Conference.

V. Witnesses

Noble is in the process of identifying any potential witnesses it may call and their intended subject matter. Noble agrees to notify Judge Colwell and the parties whether it will be submitting direct testimony in this proceeding and reserves the right to submit rebuttal and

surrebuttal testimony as it deems appropriate. Noble will comply with all deadlines established in the proceeding for the service of testimony.

VI. Schedule for Submission of Testimony, Hearings, and Briefs

Noble will cooperate with Judge Colwell and the other parties to finalize a schedule for the submission of testimony, hearings, and briefs at the Prehearing Conference.

VII. Proposed Plan and Schedule of Discovery

Noble will cooperate with Judge Colwell and all other parties at the Prehearing Conference to develop a proposed plan and schedule of discovery, as well as any reasonable and appropriate modifications to the Commission's Rules of Practice and Procedure for the conduct of discovery as are necessary.

VIII. Settlement

Noble will actively participate in settlement discussions as they may occur.

IX. Email Distribution List

In addition to the undersigned counsel, Noble requests that Becky Merola, Government Affairs East for Noble (bmerola@noblesolutions.com), be included on the email distribution list established for this proceeding.

Respectfully submitted,



Charles E. Thomas, III, Esq. (PA ID # 201014)
THOMAS, NIESEN & THOMAS, LLC
212 Locust Street, Suite 600
P.O. Box 9500
Harrisburg, PA 17108-9500
Tel: (717) 255-7600
cet3@tntlawfirm.com

Counsel for Noble Americas Energy Solutions LLC

DATED: June 3, 2014

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

CERTIFICATE OF SERVICE

I hereby certify that I have this 3rd day of June, 2014, served a true and correct copy of the foregoing Prehearing Memorandum of Noble Americas Energy Solutions LLC, upon the persons and in the manner set forth below:

Electronic Mail and First Class Mail, Postage Prepaid

Honorable Susan D. Colwell
Administrative Law Judge
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
scolwell@pa.gov

Paul E. Russell, Esq.
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
perussell@pplweb.com

David B. MacGregor, Esq.
Michael W. Hassell, Esq.
Christopher T. Wright, Esq.
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dmacgregor@postschell.com
mhassell@postschell.com
cwright@postschell.com

Aron J. Beatty, Esq.
Amy E. Hirakis, Esq.
Hobart J. Webster, Esq.
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1923
abeatty@paoca.org
ahirakis@paoca.org
hwebster@paoca.org

Carrie B. Wright, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265
carwright@pa.gov

Steven C. Gray, Esq.
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
sgray@pa.gov

David P. Zambito, Esq.
Cozen O'Connor
305 N. Front Street, Suite 400
Harrisburg, PA 17101-1236
dzambito@cozen.com

Amy M. Klodowski, Esq.
FirstEnergy Solutions Corp.
800 Cabin Hill Drive
Greensburg, PA 15601
aklodow@firstenergycorp.com

Pamela C. Polacek, Esq.
Adeolu A. Bakare, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
ppolacek@mwn.com
abakare@mwn.com

Heather M. Langeland, Esq.
PennFuture
200 First Street, Suite 200
Pittsburgh, PA 15222
langeland@pennfuture.org

Patrick M. Cicero, Esq.
Harry S. Geller, Esq.
Elizabeth R. Marx, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

Thomas J. Sniscak, Esq.
Todd S. Stewart, Esq.
Hawke McKeon & Sniscak LLP
100 N. Tenth Street
P.O. Box 1778
Harrisburg, PA 17105-1778
tjsniscak@hmslegal.com
tsstewart@hmslegal.com

Kenneth L. Mickens, Esq.
316 Yorkshire Drive
Harrisburg, PA 17111
kmickens11@verizon.net

Divesh Gupta, Esq.
Exelon Business Services Corp.
100 Constellation Way, Suite 500C
Baltimore, MD 21202
divesh.gupta@constellation.com



Charles E. Thomas, III (PA ID # 201014)