



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

June 3, 2014

Secretary Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor North  
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:

Enclosed please find an original copy of the Bureau of Investigation and  
Enforcement's (I&E) **Prehearing Memorandum** in the above-captioned proceeding.

Copies are being served on all active parties of record. If you have any questions,  
please contact me at (717) 783-6156.

Sincerely,

Carrie B. Wright  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #208185

CBW/sea  
Enclosure

cc: Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated June 3, 2014, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

**Via Electronic and First Class Mail**

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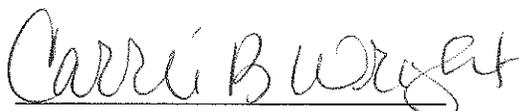
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Carrie B. Wright  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #208185

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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PREHEARING MEMORANDUM  
OF THE  
BUREAU OF INVESTIGATION AND ENFORCEMENT

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**TO ADMINISTRATIVE LAW JUDGE SUSAN COLWELL:**

The Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission (Commission) respectfully submits the following Prehearing Memorandum in the above-captioned proceeding.

The I&E Prosecutor in this proceeding will be Carrie B. Wright. Contact information is as follows:

By mail: Carrie B. Wright  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

By e-mail: [carwright@pa.gov](mailto:carwright@pa.gov)

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## **I. INTRODUCTION**

On April 18, 2014, PPL Electric Utilities Corporation (“PPL” or “Company”), pursuant to Section 2807 of the Public Utility Code, filed with the Pennsylvania Public Utility Commission (“Commission”) a request for approval of its Phase III default service program and procurement plan for the period of June 1, 2015, through May 31, 2017.

## **II. ISSUES**

The following list represents I&E’s preliminary determination of the potential issues in this case. The listing is as complete as can be made at this time. I&E specifically reserves the right to address other issues, as it deems appropriate if any such relevant issues arise. The issues are as follows:

1. Proposed method for procuring electricity to serve default customers, including the nature of the contingency plan;
2. Default service procurement process including recovery of past default service procurement costs;
3. Provisions for default service including fixed price option and time-of-use option;
4. Costs and other elements of the customer referral program

## **III. WITNESSES**

It is currently expected that I&E may call the following expert witness, without being limited thereto:

- **Kokou Apetoh, Fixed Utility Valuation Engineer**

The I&E witness may be contacted through the information listed above. The witness list is provided without the benefit of complete discovery or analysis of the positions of potential other parties to this proceeding. Accordingly, I&E reserves the right to call additional witnesses or withdraw the name of the witness listed above.

#### **IV. EVIDENCE**

I&E expects to present all written direct, rebuttal and surrebuttal testimony and accompanying exhibits at the evidentiary hearing. Moreover, I&E intends to rely on the Company's filing, answers to data requests and interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources and other public documents and reports.

#### **V. SCHEDULE**

I&E will work with the parties to develop a schedule in this proceeding.

#### **VI. SERVICE OF DOCUMENTS**

For purposes of satisfying in-hand requirements for discovery responses, prepared testimony and briefs, I&E will accept electronic delivery of documents with a follow-up hard copy provided by regular first class mail.

#### **VII. SETTLEMENT**

I&E is willing to make good faith efforts to successfully resolve this matter through settlement. In the event settlement discussions fail to result in a full and

complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding.

Respectfully Submitted,



Carrie B. Wright

Prosecutor

PA Attorney I.D. # 208185

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Post Office Box 3265  
Harrisburg, Pennsylvania 17105-3265

Dated: June 3, 2014