

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

Prehearing Memorandum

On May 5, 2014, a Prehearing Conference Order was issued by the Honorable Susan D. Colwell, Administrative Law Judge, setting a prehearing conference for Thursday, June 5, 2014 at 10:00 a.m., and requiring each party to prepare and distribute a prehearing memorandum setting forth the history of the proceeding, the issues it intends to present, and proposed witnesses, along with the subject of their testimony.

In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Conference Memorandum.

I. Background

On April 18, 2014, PPL Electric Utilities Corporation (PPL) filed a Petition with the Pennsylvania Public Utility Commission (PUC or Commission) seeking approval of its Default Service Plan for the period of June 1, 2015 through May 31, 2017. The Petition was referred to the Honorable Susan D. Colwell, Administrative Law Judge with the Office of Administrative Law Judge, to coordinate and preside over the proceedings.

As indicated above, ALJ Colwell issued a Prehearing Conference Order on May 5, 2014, scheduling a prehearing conference for June 5, 2014. On May 19, 2014, CAUSE-PA filed a Petition to Intervene and Answer to PPL’s Petition and provided service to ALJ Colwell and the

parties of record at that time. CAUSE-PA now submits this Prehearing Memorandum in furtherance of ALJ Colwell's May 5, 2014, Prehearing Conference Order.

II. Issues to be Presented

CAUSE-PA has conducted an initial review of PPL's Default Service Plan and testimony, and has identified several issues that may result in unjust and unreasonable provision of default service and could impose significant hardship on low and moderate income residential customers. Additionally, it has identified several issues that, if modified throughout the course of the proceeding, could also create a hardship for low and moderate income residential customers. In relevant part, CAUSE-PA has a discernible interest in and reserves the right to raise issue with PPL's proposals to:

- a. Adjust default service reconciliation from its current quarterly reconciliation to a semi-annual reconciliation. Petition ¶ 48.
- b. Continue offering a Time of Use (TOU) program for residential and small commercial customers, excluding customers enrolled in the company's low-income customer assistance program (CAP). Petition ¶ 66.
- c. Obtain Default Service supply through the spot market in the event that unfilled tranches remain at commencement of delivery of a given product, the recovery of which will be from retail ratepayers. Petition ¶ 107.
- d. Continue offering a Standard Offer Referral Program to all residential customers, including those enrolled in CAP. Petition ¶ 111.
- e. Promote the Standard Offer Referral Program during all customer calls, with the exception of emergencies or terminations. Petition ¶ 115.
- f. Adjust Price to Compare (PTC) on a semi-annual basis, rather than the currently quarterly adjustment of the PTC).

III. Witnesses and Testimony

CAUSE-PA reserves the right to present the following witness to testify in this matter, as well as the right to call additional witnesses as may be warranted upon proper notice to ALJ Colwell and parties.

Mitchell Miller
Mitch Miller Consulting LLC
60 Geisel Road
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Mitchmiller77@hotmail.com

Mr. Miller will address the issues identified above and any other issues that may arise in the course of this proceeding.

IV. Proposed Schedule

CAUSE-PA is amenable to the proposed schedule set forth by ALJ Colwell in her Prehearing Conference Order, and is open to further modification of that schedule if necessary to accommodate all parties. CAUSE-PA supports the submission of the testimony of witnesses in writing in advance of the hearing.

V. Public Input Hearings

CAUSE-PA does not oppose the scheduling of public input hearings, but is not presently requesting that one be scheduled.

VI. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions with any and all parties in an attempt to resolve or narrow the issues in this proceeding, and encourages the parties to engage in settlement early in the process.

VII. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project.

Electronic service and one hard copy of all documents should be served on CAUSE-PA as follows:

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WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
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DATED: June 3, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Prehearing Memorandum of CAUSE-PA**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA EMAIL and FIRST CLASS MAIL

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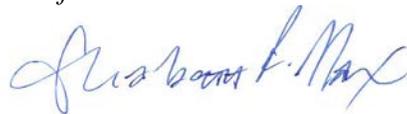
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Dated: June 3, 2014