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Citizens for Pennsylvania's Future  
200 First Avenue, Suite 200  
Pittsburgh, PA 15222  
(412) 456-2901

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 Citizens for Pennsylvania's Future Prehearing Memorandum in the above captioned matter.

Copies are being served in accordance with the attached Certificate of Service.

Sincerely,



Heather M. Langeland

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Petition of PPL Electric Utilities :  
Corporation for Approval of a Default :  
Service Program and Procurement : P-2014-2417907  
Plan for the Period June 1, 2015 :  
Through May 31, 2017 :

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**PREHEARING MEMORANDUM OF  
CITIZENS FOR PENNSYLVANIA'S FUTURE**

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Citizens for Pennsylvania's Future ("PennFuture") hereby submits this Prehearing Memorandum in the above-captioned proceeding. PennFuture intends to participate in this proceeding as an "active" party.

**I. HISTORY OF THE PROCEEDING**

On April 18, 2014, PPL Electric Utilities Corporation ("PPL") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Petition for approval of its *Default Service Program ("DSP") for the period June 1, 2015 through May 31, 2017 ("Petition")*. The DSP would apply to all retail customers in PPL's service territory.

The Prehearing Conference for the instant proceeding will be held on June 5, 2014. Administrative Law Judge Susan D. Colwell is the presiding officer.

PennFuture submits this Prehearing Conference Memorandum in compliance with ALJ Colwell's Prehearing Order.

## **II. PROPOSED PLAN AND SCHEDULE OF DISCOVERY**

PennFuture is amenable to working with the other parties in this matter to adopt a reasonable proposed plan and schedule of discovery.

## **III. POSSIBILITY OF SETTLEMENT**

PennFuture is willing to participate in settlement discussions with any party to narrow the issues in this matter.

## **IV. ANTICIPATED ISSUES AND SUB-ISSUES**

The Petitioner, on behalf of its members and the public interest, have an interest in ensuring that electric distribution companies (“EDC”) enter into long term contracts for Alternative Energy Portfolio Standards (“AEPS”) compliance. EDC default service plans cover electricity generation procurement, among other things, for customers that do not switch to competitive electricity providers. Long term contracts for AEPS compliance lowers renewable energy project financing costs and facilitates cost effective renewable energy development envisioned by the 2004 AEPS law. As such, long term contracts would be beneficial to ratepayers. PennFuture intends to review and analyze the PPL Petition as it pertains to long term contracting for AEPS credits to meet default service load compliance requirements.

PennFuture is also examining the Petition to determine compliance with Title 66 and 52 PA Code requirements of a prudent mix of spot market, short term and long term contract requirements designed to ensure adequate and reliable service at the least cost to customers over time. PennFuture is supportive of promoting competitive markets, but has concerns about overreliance on spot and short term contracts.

*PennFuture* is also concerned about PPL's expressed preference for monthly transfer of AEPS credits into its PJM Generation Attribute Tracking System (GATS) account.

*PennFuture* reserves the right to raise additional issues as they may come to light through the discovery and review process.

**V. AMOUNT OF HEARING TIME NEEDED**

At this time, *PennFuture* continues to evaluate the issues in this proceeding. However, it is anticipated that the amount of hearing time could vary from two to three days.

**VI. WITNESSES**

*PennFuture* intends to present the testimony of Eric Thumma in this matter to testify as to the above noted issues. *PennFuture* also intends to participate in this proceeding through the submission of discovery, the cross-examination of other parties' witnesses, participation in settlement negotiations as they occur, and the submission of briefs, exceptions and reply exceptions, as necessary.

**VII. SCHEDULE FOR SUBMISSION OF TESTIMONY, HEARINGS AND BRIEFS**

*PennFuture* will work with the parties to develop an appropriate procedural schedule. *PennFuture* will cooperate to develop discovery rules in accordance with the Commission's regulations and any ALJ directives.

## VIII. SERVICE OF DOCUMENTS

PennFuture agrees to electronic service of all documents to the email address below with one (1) hard copy mailing to PennFuture's office at the following address:

Heather Langeland  
200 First Avenue, Suite 200  
Pittsburgh, PA 15222  
[langeland@pennfuture.org](mailto:langeland@pennfuture.org)

Respectfully submitted,

A handwritten signature in black ink that reads "Heather M. Langeland". The signature is written in a cursive style and is positioned above a solid horizontal line.

Heather M. Langeland, Staff Attorney  
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Counsel for Petitioner PennFuture

DATED: June 3, 2014

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :  
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**CERTIFICATE OF SERVICE**

I, Heather M. Langeland, do hereby certify that a true and accurate copy of the foregoing “PREHEARING MEMORANDUM OF CITIZENS FOR PENNSYLVANIA’S FUTURE” was served on June 3, 2014 on the following by depositing a copy of the same in the United States mail, postage prepaid and addressed to:

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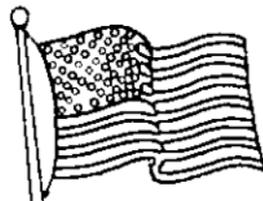


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