

with a courtesy copy sent electronically to lael.campbell@constellation.com.

III. IDENTIFICATION OF ISSUES

ExGen is at this time still formulating its position on the issues presented by the Plans. Based on a preliminary review of the Plans, ExGen expects that potential issues in this proceeding will include but not be limited to: (i) the manner in which 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 AND DISCOVERY

ExGen reserves the right to present in this proceeding direct, rebuttal, and surrebuttal fact and expert testimony, to the extent it deems necessary. At the time of this filing, ExGen does not necessarily plan to present expert testimony, however should it do so it would most likely present:

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In the event ExGen chooses a different expert witness, it will notify the Administrative Law Judge and all parties as soon as practicable. Given the voluminous materials filed in this matter, ExGen is in the process of formulating its position on PPL's Default Service Plan. To the extent

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.

ExGen agrees to adhere to the discovery procedures set forth in 52 PA Code §§ 5.321-5.373, and is willing to the extent it is able, to cooperate and exchange information on an informal basis, per the ALJ's request.

IV. REMAINING PRE-HEARING CONFERENCE ISSUES

Settlements often represent expeditious and less costly means of resolving issues raised in petitions before this Commission. At the request of the petitioning parties, ExGen, per the Pre-Hearing Conference Order, states its willingness to participate in settlement discussions. At the time of filing, ExGen is in agreement with schedule proposed in the First Prehearing Order for testimony, hearings and briefings in this matter. To the extent alternative schedules are proposed, ExGen is amenable subject to availability of ExGen Witness Campbell, whose schedule to the extent practicable will be modified to meet the needs of the Commission and parties.

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,

/s/ H. Rachel Smith

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*Counsel to Intervenor Exelon Generation Company,
LLC.*

Dated: March 3, 2006

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities
Corporation for Approval of a Default
Service Program and Procurement Plan
for the Period June 1, 2017 through May
31, 2021**

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P-2016-2526627

VERIFICATION

I, Holly Rachel Smith, Assistant General Counsel to Exelon Business Services Company hereby attest that all the facts contained in this petition to intervene and prehearing memo in the above-referenced proceeding are true and correct to the best of my knowledge.



Dated: March 3, 2016