

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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January 12, 2018

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17120

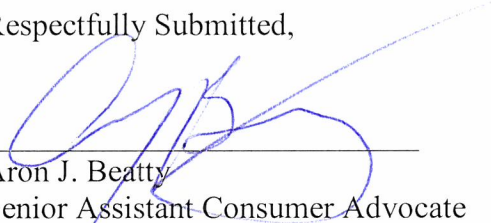
Re: Application of PPL Electric Utilities  
Corporation For Approval of Intercompany  
Restructuring  
Docket No. A-2017-2629534

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Pre-hearing Memorandum in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully Submitted,



\_\_\_\_\_  
Aron J. Beatty  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 86625  
E-Mail: ABeatty@paoca.org

Enclosure

cc: Honorable Joel Cheskis, ALJ  
Honorable Benjamin Myers, ALJ  
Certificate of Service

CERTIFICATE OF SERVICE

Re: Application of PPL Electric Utilities Corporation For Approval of Intercompany  
Restructuring  
Docket No. A-2017-2629534

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Pre-hearing Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 12<sup>th</sup> day of January 2018.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

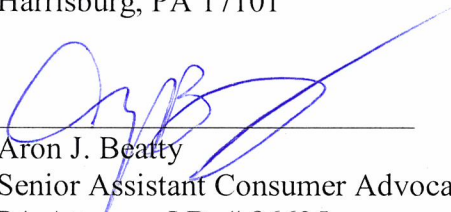
Gina L. Miller, Esquire  
Pennsylvania Public Utility Commission  
Bureau Of Investigation & Enforcement  
Po Box 3265  
Harrisburg Pa 17105-3265

SERVICE BY EMAIL AND FIRST CLASS MAIL, POSTAGE PREPAID

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January 12, 2018  
\*243143

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of PPL Electric Utilities :  
Corporation for Approval of :  
Intercompany Restructuring : Docket No. A-2017-2629534

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PREHEARING MEMORANDUM OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to the Prehearing Conference Order of Administrative Law Judges Joel H. Cheskis and Benjamin J. Myers issued on December 12, 2017, Section 333 of the Public Utility Code, 66 Pa. C.S. § 333, and in anticipation of the Prehearing Conference scheduled for Monday, January 22, 2018, the Office of Consumer Advocate (OCA) provides the following information:

**I. INTRODUCTION**

On October 16, 2017, PPL Electric Utilities Corporation (PPL EU) filed an Application for Approval of Intercompany Restructuring with the Pennsylvania Public Utility Commission (Commission). Currently, PPL EU is a direct subsidiary of PPL Corporation. As detailed in the Application, under the proposed corporate restructuring, PPL EU would become the direct subsidiary of newly formed “PPL Energy Holdings, LLC.” Petition, Exhibit B. Under the proposed restructuring, PPL EU would remain an indirect subsidiary of PPL Corporation. Application at 3.

The Application was assigned to Administrative Law Judges Cheskis and Myers for investigation and scheduling of hearings to determine whether UGI's Petition complies with the standards set forth in the Public Utility Code. The OCA filed a Notice of Intervention and Public Statement in this proceeding on November 22, 2017, to protect the interests of PPL EU's ratepayers. The OCA will participate in this proceeding to help ensure that the proposed restructuring is in accordance with Section 1103 of the Public Utility Code and all other applicable statutes, regulations, and Commission orders.

## **II. ISSUES AND SUB-ISSUES**

The OCA is reviewing the Company's filing to ensure that the proposed change of ownership does not negatively impact PPL EU's future rates. The OCA will review the Company's testimony when filed to make any final determination on which issues, if any, it will pursue.

## **III. WITNESSES**

The OCA has not identified a witness in this proceeding. If issues arise that require the OCA to identify a witness, the OCA will notify the ALJ and parties immediately.

## **IV. SERVICE ON THE OCA**

The OCA will be represented in this case by Senior Assistant Consumer Advocate Aron J. Beatty. Two copies of all documents should be served on the OCA as follows:

Aron J. Beatty  
Senior Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor Forum Place  
Harrisburg, PA 17101-1923  
Telephone: (717) 783-5048  
Facsimile: (717) 783-7152  
E-mail: [abeatty@paoca.org](mailto:abeatty@paoca.org)

**V. PROPOSED SCHEDULE**

The OCA is working with the parties to develop a mutually agreeable schedule.

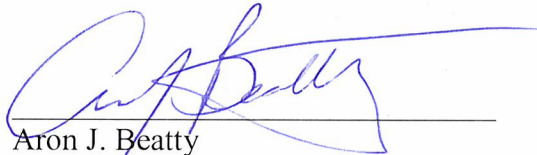
**VI. DISCOVERY**

The OCA is not proposing any discovery modifications in this proceeding.

**VII. SETTLEMENT**

The OCA is willing to participate fully in all settlement discussions as needed.

Respectfully submitted,



Aron J. Beatty  
Senior Assistant Consumer Advocate  
Pa. Attorney ID #86625  
[ABeatty@paoca.org](mailto:ABeatty@paoca.org)

Counsel for:  
Tanya J. McCloskey  
Acting Consumer Advocate

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DATED: January 12, 2018  
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