

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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May 22, 2019

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 Sale of
Facilities to the City of Lancaster
Docket No: A-2019-3008669

Dear Secretary Chiavetta:

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

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org

Attachment

cc: The Honorable Joel Cheskis, ALJ
Certificate of Service

*272788

CERTIFICATE OF SERVICE

Application of PPL Electric Utilities :
Corporation for Approval of the Transfer : Docket No. A-2019-3008669
of Sale to the City of Lancaster :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Prehearing 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 22nd day of May 2019.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

The Honorable Joel H. Cheskis
Deputy Chief Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Allison Kaster, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

Kimberly A. Klock, Esquire
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PPL Services Corporation
Two North Ninth Street
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/s/Christy M. Appleby
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of PPL Electric Corporation :
For Approval of the Transfer by Sale to the : Docket No. A-2019-3008669
City of Lancaster of Electrical Facilities Located :
In the City of Lancaster, Lancaster County, PA :

PREHEARING MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to the Prehearing Conference Order of Administrative Law Judge Joel H. Cheskis issued on April 18, 2019, Section 333 of the Public Utility Code, 66 Pa. C.S. Section 333, and in anticipation of the Prehearing Conference scheduled for May 29, 2019, the Office of Consumer Advocate (OCA) provides the following information:

I. INTRODUCTION

On March 19, 2019, PPL filed its Application to the Pennsylvania Public Utility Commission (Commission) for approval to transfer by sale certain street lighting facilities to the City of Lancaster (City). The purchase of these facilities, if approved, would allow the City to change from Rate Schedule SHS to Rate Schedule SE for all of its street lighting services. As such, PPL's Application provides that the sale will result in rate savings for the City by permitting more efficient and economical operations and there will be no negative impact on existing operations.

The Application was assigned to Administrative Law Judge Cheskis for investigation and scheduling of hearings to determine whether PPL's Petition complies with the standards set forth

in the Public Utility Code, applicable Commission rules, and Pennsylvania law. The OCA filed a Notice of Intervention and Public Statement in this proceeding on May 21, 2019, to protect the interests of PPL's ratepayers.

II. ISSUES AND SUB-ISSUES

The OCA is reviewing the Company's filing to ensure that the Petition complies with the law and to protect the interests of PPL's ratepayers. The OCA will review the Company's testimony when filed to make any 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 the parties immediately.

IV. SERVICE ON THE OCA

The OCA will be represented in this case by Senior Assistant Consumer Advocate Darryl A. Lawrence and Assistant Consumer Advocate Christy M. Appleby. Two copies of all documents should be served as follows:

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V. PROPOSED SCHEDULE

The OCA will work 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 fully participate in all settlement discussions as needed.

Respectfully Submitted,



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DATE: May 22, 2019
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