



COMMONWEALTH OF PENNSYLVANIA

May 22, 2019

E-FILED

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum, on behalf of the Office of Small Business Advocate ("OSBA"), in the above-captioned proceeding. I respectfully request that a copy of any documents filed in this case also be shared with our witness at the address below:

Robert D. Knecht
Industrial Economics Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140
rdk@indecon.com

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Shelby A. Linton-Keddie
Assistant Small Business Advocate
Attorney ID No. 206425

Enclosures

cc: Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Representing the OSBA in this matter is Assistant Small Business Advocate Shelby A. Linton-Keddie. Please address all correspondence as follows:

Shelby A. Linton-Keddie
Assistant Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, Pennsylvania 17101
(717) 783-2525
(717) 783-2831 (fax)
slinton-ke@pa.gov

II. FILING BACKGROUND

On March 18, 2019, PPL Electric Utilities Corporation (“PPL” or “Company”) filed with the Pennsylvania Public Utility Commission an application pursuant to 66 Pa. C.S. § 1102 for approval to transfer by sale certain lighting facilities to the City of Lancaster. The OSBA filed an Intervention in this proceeding on April 26, 2019.

III. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Robert D. Knecht
Industrial Economics Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 – fax
rdk@indecon.com

After an initial review of the materials submitted by PPL, the OSBA has identified the following issues:

1. How, and to what extent, the street light system purchase and sale by the City of Lancaster may impact PPL’s other customers;
2. Whether all of the components of PPL’s proposed sale are reasonable, accurately calculated and allocated; and,
3. Any other issues that may arise during the course of the OSBA’s review of the Company’s filing that affect small business customers.

The OSBA will participate in the case to assure that the interests of small business customers of PPL are adequately represented and protected.

As appropriate and necessary, the OSBA will investigate and analyze the claims and proposals of the Company and other parties through discovery, through the cross-examination of witnesses appearing for those parties, through the filing of testimony, and through briefing. The OSBA will particularly focus on any issue where the impact on the interests of the Company's small business consumers would be unjustifiably different than, or disproportionate to, the impact on another class of customers, or otherwise lacking in reasonableness or basic fairness. The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

IV. SERVICE OF DOCUMENTS

The OSBA requests that all parties serve a hard copy of any document filed in this case upon the OSBA and the OSBA witness identified above. In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. Service by electronic mail *only* is not acceptable.

V. SETTLEMENT

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

VI. HEARING AND BRIEFING SCHEDULE

The OSBA will cooperate with the other parties to develop a workable and reasonable procedural schedule.

Respectfully submitted,



Shelby A. Linton-Keddie
Assistant Small Business Advocate
Attorney ID No. 206425

For:

John R. Evans
Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101

Dated: May 22, 2019

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Application of PPL Electric Utilities :
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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Joel H. Cheskis
Deputy Chief Administrative Law Judge
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(Email and Hand Delivery)

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(Email and Hand Delivery)

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DATE: May 22, 2019



Shelby A. Linton-Keddie
Assistant Small Business Advocate
Attorney ID No. 206425