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File #: 140056

May 22, 2019

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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

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Dear Secretary Chiavetta:

Enclosed for filing is the Prehearing Conference Memorandum of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/jl  
Enclosures

cc: Honorable Joel H. Cheskis  
Certificate of Service

**CERTIFICATE OF SERVICE**

**(Docket No. A-2019-3008669)**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA E-MAIL & FIRST CLASS MAIL**

Shelby A. Linton-Keddie, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101

Christy Appleby, Esquire  
Darryl A. Lawrence, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923

Allison Curtin Kaster, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

Date: May 22, 2019



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Devin Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PREHEARING CONFERENCE MEMORANDUM OF  
PPL ELECTRIC UTILITIES CORPORATION**

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TO ADMINISTRATIVE LAW JUDGE JOEL H. CHESKIS:

Pursuant to 52 Pa. Code § 5.224(c) and the Prehearing Conference Order dated April 18, 2019, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby submits this Prehearing Conference Memorandum in the above-captioned matter and states as follows:

**I. PROCEDURAL HISTORY**

On March 18, 2019, PPL Electric filed the above-captioned Application for the Pennsylvania Public Utility Commission’s (“Commission”) approval of the transfer by sale of certain streetlight electric facilities to the City of Lancaster (“City”).

On April 12, 2019, the Commission’s Bureau of Investigation and Enforcement (“I&E”) filed a Protest to the Application.

On April 15, 2019, the Office of Consumer Advocate (“OCA”) filed a Notice of Intervention and Public Statement.

Also on April 15, 2019, PPL Electric filed a Notice of Entry of Appearance and a proof of publication of the public notice for the Application.

On April 18, 2019, a Notice was issued scheduling a prehearing conference in Harrisburg, Pennsylvania, on May 29, 2019, at 10:00 AM before Administrative Law Judge Joel

H. Cheskis (“ALJ”). Further, a Prehearing Conference Order was issued, in which the ALJ directed the parties to, among other things, file prehearing memoranda on or before May 22, 2019.

On April 26, 2019, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance, Notice of Intervention, Public Statement, and Verification.

PPL Electric herein files this Prehearing Memorandum pursuant to the Prehearing Conference Order.

## **II. SERVICE OF DOCUMENTS**

PPL Electric requests that Devin T. Ryan be listed on the service list on behalf of the Company. His contact information is provided below:

Devin T. Ryan (ID # 316602)  
Post & Schell, P.C.  
17 North Front Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: dryan@postschell.com

PPL Electric agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon Kimberly A. Klock, Esquire, at [kklock@pplweb.com](mailto:kklock@pplweb.com), Michael J. Shafer, Esquire, at [mjshafer@pplweb.com](mailto:mjshafer@pplweb.com), and David B. MacGregor, Esquire, at [dmacgregor@postschell.com](mailto:dmacgregor@postschell.com).

## **III. WITNESSES AND ISSUES**

At this time, PPL Electric intends to call the following witnesses to testify on behalf of the Company:

Denis R. Pancoast  
Senior Engineer  
PPL Electric Utilities Corporation  
2 North Ninth Street  
Allentown, PA 18101  
610-774-3360

Robert A. Gallo, Jr., P.E.  
Regional Design Supervisor  
PPL Electric Utilities Corporation  
651 Delp Rd  
Lancaster, PA 17601-3034  
717-721-4903

John H. Schwartz  
Manager – Property Accounting  
PPL EU Services Corporation  
2 North Ninth Street  
Allentown, PA 18101  
610-774-3978

In general, Mr. Pancoast will testify about the transaction contract and rate schedules involved, Mr. Gallo will address the engineering design, and Mr. Schwartz will testify about plant accounting.

PPL Electric's testimony will demonstrate that the proposed transaction is in the public interest and should be approved and will respond to any issues raised by I&E, OCA, and OSBA. PPL Electric reserves the right to call additional witnesses, present testimony, or both on additional issues and subject matters that may arise during the course of this proceeding.

#### **IV. DISCOVERY**

PPL Electric does not propose any special orders regarding discovery. PPL Electric is willing to work with the parties, through informal discovery, to expedite discovery. The protection of confidential information is addressed in Section VIII., below.

**V. PROCEDURAL SCHEDULE**

In advance of the prehearing conference, PPL Electric will work with the parties in an effort to develop a mutually-acceptable procedural schedule.

**VI. PROTECTION OF CONFIDENTIAL INFORMATION**

If any confidential information is requested or will be presented in this proceeding, PPL Electric will submit a Motion for Protective Order for consideration by the ALJ. PPL Electric will seek the concurrence of the other parties as to the form of the Protective Order before submitting the Motion.

**VII. SETTLEMENT DISCUSSIONS**

PPL Electric has discussed trying to resolve I&E's Protest to the Application. PPL Electric will continue to work the parties in an effort to resolve this proceeding through settlement. If a resolution is reached prior to the prehearing conference, PPL Electric will inform the ALJ as expeditiously as it can.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
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David B. MacGregor (ID # 28804)  
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Date: May 22, 2019

Attorneys for PPL Electric Utilities Corporation