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File #: 140056

June 11, 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

Dear Secretary Chiavetta:

Enclosed for filing is the Motion of PPL Electric Utilities Corporation to Transfer the Application to the Pennsylvania Public Utility Commission's Bureau of Technical Utility Services in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'DR', with a long horizontal line extending to the left.

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
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400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Date: June 11, 2019



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 :

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION TO
TRANSFER THE APPLICATION TO THE PENNSYLVANIA PUBLIC UTILITY
COMMISSION'S BUREAU OF TECHNICAL UTILITY SERVICES**

TO ADMINISTRATIVE LAW JUDGE JOEL H. CHESKIS:

In accordance with the provisions of Section 5.103 of the regulations of the Pennsylvania Public Utility Commission ("Commission"), 52 Pa. Code § 5.103, PPL Electric Utilities Corporation ("PPL Electric") respectfully requests that Administrative Law Judge Joel H. Cheskis ("ALJ") transfer the above-referenced Application to the Commissioner's Bureau of Technical Utility Services ("TUS") for disposition.

I. HISTORY OF THE PROCEEDING

1. On March 18, 2019, PPL Electric filed the above-captioned Application for the Commission's approval of the transfer by sale of certain streetlight electric facilities to the City of Lancaster ("City").

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

3. 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.

4. On April 18, 2019, a Notice was issued scheduling a prehearing conference in Harrisburg, Pennsylvania, on May 29, 2019, at 10:00 AM before the 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.

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

6. On May 22, 2019, PPL Electric, OCA, OSBA, and I&E filed prehearing memoranda pursuant to the Prehearing Conference Order. Also, OCA filed a Notice of Appearance.

7. On May 23, 2019, PPL Electric informed the ALJ that the parties were able to resolve the issues raised in I&E’s Protest to the above-captioned Application, with the understanding that PPL Electric is not seeking any ruling as part of the approval of this Application on the ratemaking treatment of the proposed transaction. Accordingly, the Company stated that I&E will be filing a request to request to withdraw its Protest without prejudice to raising these issues in PPL Electric’s next base rate case, after which PPL Electric will file a Motion to Transfer the matter to TUS for review. The ALJ subsequently told the parties that the prehearing conference would be canceled.

8. On May 24, 2019, a notice was issued canceling the prehearing conference scheduled for May 29, 2019.

9. On May 29, 2019, I&E filed a letter requesting that its Protest be withdrawn.

10. On June 10, 2019, PPL Electric filed a letter confirming I&E’s representations in the May 29, 2019 letter that the withdrawal of I&E’s Protest would be without prejudice to

parties raising issues related to the ratemaking treatment of the proposed transaction in the Company's next base rate case.

II. REQUEST TO TRANSFER THE APPLICATION TO TUS

11. With the withdrawal of I&E's Protest, there is no opposition to PPL Electric's Application. Hearings in this case would be unnecessary and add unnecessary costs. However, the Commission must still determine whether the proposed transaction is in the public interest.

12. PPL Electric avers that the most efficient course of action would be to transfer the Company's Application to TUS for review and disposition. *See Joint Application of Aqua Pa., Inc. and Superior Water, Inc., for Approval of the Transfer by Merger, of All Stock and Rights of Superior Water Co., Inc. to Aqua Pa., Inc.*, Docket No. A-2015-2472472 (Aug. 11, 2015) (Buckley, J.); *Application of the York Water Co. for Approval of the Right to Acquire the Wastewater Sys. Assets of the Borough of Jacobus, York Cnty., Pa., and for York Water Co. to Begin to Furnish Wastewater Serv. to the Pub. in the Borough of Jacobus, York Cnty., Pa.*, Docket No. A-2019-3007355 (Apr. 1, 2019) (Buckley, J.)

13. The requested transfer will conserve the time and resources of the parties, the ALJ, and the Commission and will obviate the need for a fully litigated, adversarial proceeding.

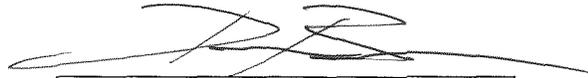
14. Moreover, the Company's request to transfer the Application to TUS has been discussed with the other parties. As previously indicated to the ALJ on May 23, 2019, none of the parties oppose the requested transfer.

15. For these reasons, PPL Electric respectfully requests that the instant Motion be granted and that the ALJ transfer the above-captioned Application to TUS for review and disposition.

III. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Joel H. Cheskis transfer this matter to the Commission's Bureau of Technical Utility Services for review and disposition.

Respectfully submitted,



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Date: June 11, 2019

Attorneys for PPL Electric Utilities Corporation

VERIFICATION

I, DENIS R. PANCOAST, being a Senior Engineer at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 6-10-2019

Denis R. Pancoast
Denis R. Pancoast