



COMMONWEALTH OF PENNSYLVANIA

May 12, 2020

E-FILED

The Honorable Elizabeth H. Barnes
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120

Re: Petition of PPL Electric Utilities Corporation for Approval of its Default Service Plan for the Period June 1, 2021 Through May 31, 2025 / Docket No. P-2020-3019356

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,

/s/ Steven C. Gray

Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of its Default :
Service Plan : **Docket No. P-2020-3019356**
for the Period June 1, 2021 through :
May 31, 2025 :

**PREHEARING MEMORANDUM
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers 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 the above-referenced matter is Assistant Small Business Advocate Steven C. Gray. Please address all correspondence in that matter as follows:

Steven C. Gray, Esq.
Senior Supervising
Assistant Small Business Advocate
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
sgray@pa.gov

II. FILING BACKGROUND

PPL Electric Utilities Corporation (“PPL” or the “Company”) filed a Petition for the Approval of a Default Service Plan for the Period June 1, 2021 through May 31, 2025 (“Petition”) with the Commission on March 25, 2020. The OSBA filed a Notice of Intervention on May 8, 2020.

III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES

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

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

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

After an initial review of the materials submitted by PPL, the OSBA has identified the following list of issues that it will evaluate in this proceeding:

1. Whether the proposed methodology and timing of the small commercial and industrial (“Small C&I”) customer procurements is reasonable.
2. Whether the Company’s proposal to retain different definitions of “Small C&I” for Generation Supply Charge (“GSC”) and Transmission Service Charge (“TSC”) purposes remains reasonable.
3. Whether the Company’s proposal to continue to recover transmission costs related

to default service customers in a reconcilable utility charge is anti-competitive.

4. Whether the Company's proposals for (a) direct procurement of alternative energy credits ("AECs"), (b) reconciliation of AEC costs and revenues, and (c) allocation of AECs to the various default service rate groups is fair and reasonable.

5. Whether the Company's proposal to offer a Renewable Energy Rate Program is reasonable, and consistent with the mandate for a default service provider.

6. Whether the Company's proposed changes to the Standard Offer program are reasonable.

7. Whether, in light of the Company's findings about EGS pricing, the requirement that all customers with peak demand in excess of 100 kW be offered only an hourly-priced default service option, is fair and reasonable.

8. Whether the Company's proposed changes to the 100 kW demand demarcation approach are reasonable.

9. Whether the Company's proposed changes to the design for the time-of-use "default service" rate option are reasonable.

10. Whether PPL Electric is experiencing higher uncollectibles rates for shopping customers than for default service customers.

The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

IV. SERVICE OF DOCUMENTS

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date¹ as satisfying the in-hand requirement. At the time of this writing, hard copy delivery of documents to the OSBA is not possible. The OSBA requests that email delivery of documents also be provided to its witnesses identified above.

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

V. SETTLEMENT

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

VI. DISCOVERY

The OSBA does not propose any discovery modifications in this proceeding.

¹ In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

VII. HEARING AND BRIEFING SCHEDULE

At the time of this writing, the parties are discussing a proposed procedural schedule.

In light of the Governor's restriction on travel for those offices under his jurisdiction, the OSBA respectfully requests that the evidentiary hearings take place in Harrisburg.

Respectfully submitted,

/s/ Steven C. Gray

Steven C. Gray, Esq.
Senior Supervising
Assistant Small Business Advocate
Attorney ID # 77538

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Dated: May 12, 2020

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Through May 31, 2025 :
:

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*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).

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