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April 25, 2024

VIA ELECTRONIC FILE

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: Petition of PPL Electric Utilities Corporation for Approval of Its Default Service Program and Procurement Plan for the Period from June 1, 2025 through May 31, 2029 Docket No. P-2024-3047290

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("Commission") is the Prehearing Memorandum of Shell Energy North America (US), L.P. in the above-referenced proceeding. As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document.

cc: Hon. F. Joseph Brady w/enc.
Cert. of Service w/ enc.

Sincerely,

/s/ Clifford B. Levine
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CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the foregoing document on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email Only

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April 25, 2024

/s/ Clifford B. Levine
Clifford B. Levine

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities)
Corporation for Approval of a Default) Docket No. P-2024-3047290
Service Program and Procurement Plan)
from June 1, 2025 Through May 31, 2029)

To the Honorable F. Joseph Brady and the Honorable Charles Rainey:

Pursuant to the Prehearing Conference Order dated April 16, 2024, in the above-captioned proceeding and Sections 5.221 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Regulations 52 Pa. Code Section 5.221, Shell Energy North America (US), L.P (“Shell Energy”) hereby files this Prehearing Conference Memorandum.¹

I. PROCEDURAL HISTORY

1. On March 12, 2024, PPL Electric Utilities Corporation ("PPL") petitioned the Commission for approval of the Company's sixth Default Service Program ("DSP V").
2. On April 19, 2024, Shell Energy petitioned to intervene in this proceeding.
3. Shell Energy is a participant as a supplier in the PPL Default Service Program and as such is directly affected by the default service programs maintained by PPL and other electric utilities.

II. COUNSEL

4. The name and address of Shell Energy’s attorneys are:

Clifford Levine (ID No. 33507)
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Rebecca E. Kennedy (ID No. 321475)
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¹ As used herein, "Shell" refers collectively to Shell Energy North America (US), L.P. and its retail subsidiaries. Shell Energy has overall responsibility for the business activities of its retail subsidiaries, which serve residential, commercial, institutional and industrial customers in Pennsylvania's retail electric and gas markets.

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All parties are requested to hereafter serve said counsel electronically with all documents served in this proceeding.

III. EXPECTED ISSUES

5. Shell Energy is a participant as a supplier in the PPL Default Service Program to customers in the PPL service territory and will be specifically and substantially affected by the outcome of this proceeding, which may alter the terms and conditions under which EGSs provide service to retail end users. Shell Energy is continuing to evaluate PPL's proposals and the forthcoming positions of other parties in relation to their interests and will determine to what extent, if necessary, it identifies issues necessary to bring to the Commission's attention. As such, Shell Energy reserves the right to raise other issues identified through its continued review and analysis in this case.

IV. PROPOSED WITNESSES

6. Shell Energy reserves the right to file direct testimony. Shell Energy reserves the right to offer additional witnesses as necessitated by the issues.

V. LITIGATION SCHEDULE

7. Shell Energy will cooperate with the parties and the Presiding Officers to develop and agree upon a reasonable litigation schedule.

VI. DISCOVERY

8. Shell Energy has not submitted discovery as of the date of this Prehearing Conference Memorandum. Should it conclude that such discovery is necessary, it will submit its requests consistent with the schedule proposed by PPL. Shell Energy will

cooperate with the parties and the Presiding Officers to develop and agree upon discovery procedures including a discovery schedule.

VII. SETTLEMENT

9. Shell Energy is willing to engage in settlement discussions with any and all parties at any time during this proceeding.

WHEREFORE, Shell Energy respectfully submits this Prehearing Conference Memorandum in anticipation of the Prehearing Conference currently scheduled to be held telephonically on April 26, 2024, at 10:00 am

Respectfully submitted,

By: /s/ Clifford B. Levine
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Dated: April 25, 2024