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May 31, 2024

VIA ELECTRONIC FILING

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

**Re: Petition of PPL Electric Utilities Corporation for a Waiver of the Distribution
System Improvement Charge Cap of 5% of Billed Revenues
Docket No. P-2024-3048732**

Dear Secretary Chiavetta:

Enclosed for filing is the Prehearing Conference Memorandum of PPL Electric Utilities Corporation.

Copies are being provided as indicated on the attached Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/dmc
Enclosures

cc: Certificate of Service
Honorable Arlene Ashton

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filing 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

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Allison Kaster, Esquire
Director
Bureau of Investigation & Enforcement
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P.O. Box 3265
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Date: May 31, 2024



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities	:	
Corporation for a Waiver of the	:	Docket No. P-2024-3048732
Distribution System Improvement Charge	:	
Cap of 5% of Billed Revenues	:	

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

TO ADMINISTRATIVE LAW JUDGE ARLENE ASHTON:

Pursuant to 52 Pa. Code § 5.222(d) and the Prehearing Order dated May 29, 2024, PPL Electric Utilities Corporation (“PPL Electric” or “Company”) hereby submits this Prehearing Conference Memorandum.

I. BACKGROUND

On April 26, 2024, PPL Electric filed a Petition requesting that the Pennsylvania Public Utility Commission (“Commission”) waive the Company’s Distribution System Improvement Charge (“DSIC”) cap of 5% of billed revenues and increase the maximum allowable DSIC to 9% for bills rendered on or after January 1, 2025, because a higher DSIC cap is necessary to ensure and maintain adequate, efficient, safe, reliable, and reasonable service for the benefit of PPL Electric’s customers and as required by Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501.

On May 16, 2024, the Office of Small Business Advocate (“OSBA”) filed a Notice of Intervention, Public Statement, and Verification at the above-captioned docket.

Also on May 16, 2024, the Commission’s Bureau of Investigation and Enforcement (“I&E”) and the Office of Consumer Advocate (“OCA”) filed Answers to the Petition.

On May 28, 2024, an Initial Telephonic Prehearing Conference Notice was issued, scheduling a telephonic prehearing conference for June 3, 2024, at 10:00 before Administrative Law Judge Arlene Ashton (the “ALJ”).

On May 29, 2024, the ALJ issued a Prehearing Order, which, among other things, directed the parties to file Prehearing Conference Memoranda on or before 10:00 AM on May 31, 2024.

II. SERVICE OF DOCUMENTS

PPL Electric’s attorneys in this proceeding are Kimberly A. Klock, Esquire, Michael J. Shafer, Esquire, David B. MacGregor, Esquire, and Devin T. Ryan, Esquire. PPL Electric requests that Devin T. Ryan be listed as the recipient for service. Mr. Ryan’s contact information is provided below:

Devin T. Ryan (ID # 316602)
Post & Schell, P.C.
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
Phone: 717-612-6052
E-mail: dryan@postschell.com

PPL Electric also requests that Ms. Klock, Mr. Shafer, and Mr. MacGregor be added to any informal e-mail distribution lists in this proceeding. Ms. Klock’s e-mail address is kklock@pplweb.com, Mr. Shafer’s e-mail address is mjshafer@pplweb.com, and Mr. MacGregor’s e-mail address is dmacgregor@postschell.com. In addition, PPL Electric agrees to receive service of documents electronically in this proceeding.

The lead representative on behalf of PPL Electric for purposes of the prehearing conference will be Mr. Ryan.

III. DISCOVERY

In light of the schedule needed to facilitate a Commission ruling by its December 5, 2024 public meeting (see Section IV, *infra*), PPL Electric proposes the following modifications to the Commission's discovery rules:

1. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
2. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
3. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) calendar days of service of written objections.
4. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) calendar days of service of such motions.
5. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
6. Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.
7. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

The Company also is not aware of any outstanding discovery disputes. The Company is willing to work with the parties, through informal discovery, to expedite discovery.

IV. PROCEDURAL SCHEDULE

PPL Electric proposes the following procedural schedule, which is designed to facilitate Commission approval of the Petition by the December 5, 2024 public meeting, as requested in PPL Electric's Petition:

Other Parties' Direct Testimony	Tuesday, June 25, 2024
Rebuttal Testimony	Tuesday, July 16, 2024
Surrebuttal Testimony	Thursday, July 25, 2024
Hearing/Oral Rejoinder Testimony	Tuesday, July 30, 2024
Main Briefs	Wednesday, August 21, 2024
Reply Briefs	Wednesday, September 4, 2024
Recommended Decision	Tuesday, October 8, 2024
Exceptions	Thursday, October 24, 2024
Replies to Exceptions	Tuesday, November 5, 2024
Final Order	Thursday, December 5, 2024

The Company is willing to work with the parties to develop a mutually-acceptable litigation schedule.

V. PUBLIC INPUT HEARINGS

PPL Electric is not aware of any substantial consumer interest concerning this proceeding that would warrant public input hearings.

VI. WITNESSES AND ISSUES

The Company's list of intended witnesses and issues to be addressed is provided below.

PPL Electric reserves the right to call additional witnesses or substitute witnesses, as necessary, to address issues that may arise during the course of this proceeding.

Statement Number	Witness	Subject Matter
1	Steven D. Selkregg Director of T&D Operations PPL Electric 7231 Windsor Drive Allentown, PA 18106	1. Overview of the Company's Long-Term Infrastructure Improvement Plan ("LTIIP"); and 2. Provide support for the Company's request to waive the 5% DSIC cap.
2	Bethany L. Johnson Senior Director of Regulatory PPL Electric 827 Hausman Road Allentown, PA 18104	1. Overview of the Company's DSIC; 2. Explain the Company's proposal to increase the DSIC from 5% to 9%; and 3. Provide details about the rate and bill impacts associated with the Company's proposal.

VII. PROTECTION OF CONFIDENTIAL INFORMATION

If necessary, PPL Electric will timely submit an appropriate Motion for Protective Order.

VIII. SETTLEMENT

As of filing this Prehearing Conference Memorandum, no formal settlement discussions have been held. However, PPL Electric remains willing to discuss settlement with the other parties to resolve all or some of the issues in this proceeding.

Respectfully submitted,



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Dated: May 31, 2024

Attorneys for PPL Electric Utilities Corp.