



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
717-731-1985 Direct Fax
File #: 2507/158811

August 8, 2014

VIA ELECTRONIC FILING

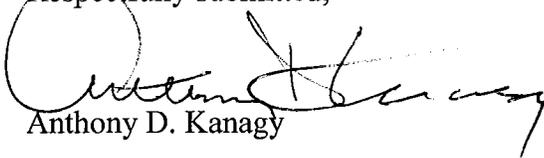
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation for Approval of Its Smart Meter
Technology Procurement and Installation Plan
Docket No. M-2014-2430781**

Dear Secretary Chiavetta:

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

Respectfully submitted,



Anthony D. Kanagy

ADK/skr
Enclosure

cc: Honorable Susan D. Colwell
Certificate of Service

CERTIFICATE OF SERVICE

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 § 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

Christy M. Appleby, Esquire
Amy Hirakis, Esquire
Hobart J. Webster, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Steven C. Gray, Esquire
Office of Small Business Advocate
Commerce Building
300 North Second Street, Suite 1102
Harrisburg, PA 17101

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

Pamela C. Polacek, Esquire
Adeolu A. Bakare, Esquire
McNees, Wallace & Nurick
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
Counsel for PPLICA

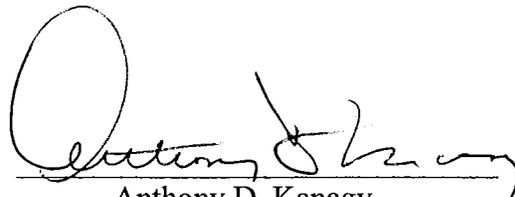
Kimberly H. Childe, Esquire
PA Department of Environmental Protection
RCSOB, 9th Floor
400 Market Street
Harrisburg, PA 17101-2301
Counsel for DEP

Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Place
Suite 500
Baltimore, MD 21202
Counsel for Constellation Energy Group, Inc.

Harry S. Geller, Esquire
Elizabeth R. Marx, Esquire
PA Utility Law Project
118 Locust Street
Harrisburg, PA 17101-1414
Counsel for CAUSE-PA

Scott J. Rubin, Esquire
Public Utility Consulting
333 Oak Lane
Bloomsburg, PA 17815
*Counsel for International Brotherhood
Of Electrical Workers, Local 1600*

Date: August 8, 2014


Anthony D. Kanagy

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of Its Smart Meter Technology : Docket No. M-2014-2430781
Procurement and Installation Plan :

**PPL ELECTRIC UTILITIES CORPORATION
PREHEARING CONFERENCE MEMORANDUM**

TO ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:

I. INTRODUCTION

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby submits this Prehearing Conference Memorandum pursuant to the First Prehearing Order issued by Administrative Law Judge Susan D. Colwell (the “ALJ”) on July 8, 2014 in the above-captioned proceeding.

On June 30, 2014, PPL Electric filed the above-captioned Petition with the Pennsylvania Public Utility Commission (“Commission”). The Petition sets forth the Company’s Smart Meter Plan in compliance with Act 129 of 2008, P.L. 1592 (“Act 129”), the Commission’s Smart Meter *Implementation Order*,¹ and the Commission’s *2012 Smart Meter Order* regarding PPL Electric’s request to extend the grace period to allow additional time for the Company to file a Smart Meter Plan.²

¹ *Smart Meter Procurement and Installation*, Docket No. M-2009-2092655, Order entered June 24, 2009 (“*Implementation Order*”).

² *Petition of PPL Electric Utilities Corporation for Approval to Modify its Smart Meter Technology Procurement and Installation Plan and to Extend its Grace Period*, Docket Nos. P-2012-2303075, M-2009-2123945, Order entered August 2, 2012 (“*2012 Smart Meter Order*”).

PPL Electric's Smart Meter Petition sets forth a detailed history of the Company's smart meter related filings, an explanation of why the Company's existing metering system must be replaced, a summary of the Company's technology assessment, a description of the proposed smart meter capabilities, a description of the proposed vendor selection process, an implementation plan, a description of cybersecurity and data privacy measures, organizational impacts, program risks, program benefits, estimated costs, a cost recovery proposal and a description of the Company's customer education and outreach measures, among other topics.

In addition to the Petition, the Company submitted its Smart Meter Technology Procurement and Installation Plan ("Smart Meter Plan" or "SMP") as well as the Direct Testimony of six (6) witnesses, described in more detail below, supporting the SMP.

On July 8, 2014, the ALJ issued the First Prehearing Order which set forth certain rules for the prehearing conference scheduled for August 11, 2014 and for the proceeding.

On July 21, 2014, the Office of Consumer Advocate ("OCA") filed a Notice of Intervention, Public Statement and Answer.

On August 6, 2014, the Office of Small Business Advocate ("OSBA") filed a Notice of Intervention, Public Statement, Answer and Notice of Appearance.

On August 7, 2014, the International Brotherhood of Electrical Workers, Local 1600, filed a Petition to Intervene.

On August 8, 2014, the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania filed a Petition to Intervene.

II. COUNSEL

PPL Electric will be represented in the above-captioned proceeding by the following counsel:

Paul E. Russell (I.D. #21643)
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Phone: 610-774-4254
Fax: 610-774-6726
E-mail: perussell@pplweb.com

David B. MacGregor (I.D. #28804)
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
Phone: 215-587-1197
Fax: 215-320-4879
E-mail: dmacgregor@postschell.com

Anthony D. Kanagy (ID #85522)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6034
Fax: 717-731-1985
E-mail: akanagy@postschell.com

PPL Electric's counsel are authorized to receive copies of all documents served in this proceeding. In addition, PPL Electric agrees to receive service of documents electronically in this proceeding.

III. WITNESSES AND ISSUES

PPL Electric's interpretation of the issues in this proceeding is set forth in the direct testimony and exhibits that the Company filed with its Petition. The names, addresses and areas of testimony for each witness are provided below.

Dennis A. Urban Jr. PPL Electric Utilities Corporation Two North Ninth Street Allentown, PA 18101-1179	PPL Electric St. No. 1	- Overview of the Company - Existing Metering System - Overview of SMP
David R. Glenwright PPL Electric Utilities Corporation Two North Ninth Street (GENN3) Allentown, PA 18101-1179	PPL Electric St. No. 2	- Background of Current AMI System - Pilot Programs - Technology Assessments - Implementation Plan - SMP Benefits
Jason Kinslow IBM Corp. 9201 Arboretum Parkway Richmond, VA	PPL Electric St. No. 3	- Technical Assessment - SMP Systems
Christine E. Ogozaly PPL Electric Utilities Corporation 827 Hausman Road Allentown, PA 18101	PPL Electric St. No. 4	- Financial Overview - Vendor Selection Process - Organizational Impacts - Program Risks
Kent Simendinger PPL Electric Utilities Corporation Two North Ninth Street (GENN1B) Allentown, PA 18101	PPL Electric St. No. 5	- Cyber Security and Data Privacy
Bethany L. Johnson PPL Electric Utilities Corporation Two North Ninth Street Allentown, PA 18101-1179	PPL Electric St. No. 6	- Cost Recovery

The subject matters listed above, as further supported by the testimony and exhibits, represent PPL Electric's statement of the issues on this proceeding. Further definition of the issues will be developed by the parties during the course of this proceeding. PPL Electric

reserves the right to call additional witnesses to present testimony on additional issues and subject matters that may arise during the course of this proceeding.

IV. SCHEDULE

PPL Electric has attempted to work with the statutory parties to develop a schedule that would allow for a Commission decision on a more accelerated basis than the schedule proposed by the ALJ. However, several parties opposed the Company's proposal. Therefore, the Company supports the schedule set forth in the ALJ's First Prehearing Order.

V. SETTLEMENT

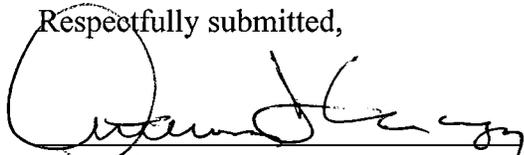
PPL Electric is willing to enter into settlement discussions with all parties in this proceeding.

VI. DISCOVERY

PPL Electric does not propose any special discovery rules for this proceeding and is willing to participate in informal discussions with parties. Given the ample time for other

parties' direct testimony in this proceeding, PPL Electric would oppose any request to shorten the discovery response times set forth in the Commission's regulations.

Respectfully submitted,



Paul E. Russell, Esquire (I.D. #21643)
Associate General Counsel
PPL Services Corporation
Office of General Counsel
Two North Ninth Street
Allentown, PA 18101-1179
Phone: 610-774-4254
Fax: 610-774-6726
E-Mail: perussell@pplweb.com

David B. MacGregor, Esquire (I.D. #28804)
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103-2808
Phone: 215-587-1197
Fax: 215-320-4879
E-Mail: dmacgregor@postschell.com

Anthony D. Kanagy, Esquire (I.D. #85522)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-712-6034
Fax: 717-731-1985
E-Mail: akanagy@postschell.com

Dated: August 8, 2014

Attorneys for PPL Electric Utilities Corporation