



THOMAS, NIESEN & THOMAS, LLC

*Attorneys and Counsellors at Law*

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March 4, 2016

*Via Electronic Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation for  
Approval of a Default Service Program and Procurement  
Plan for the Period June 1, 2017 through May 31, 2021;  
Docket No. P-2016-2526627

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Noble Americas Energy Solutions LLC is its Prehearing Memorandum in the above-referenced matter. Copies of the Prehearing Memorandum are being served upon the persons and in the manner set forth in the certificate of service attached to it.

Should you have any questions or require additional information, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Charles E. Thomas, III

Enclosure

cc: Certificate of Service (w/encl.)  
Becky Merola (w/encl.)

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Petition of PPL Electric Utilities Corporation :  
for Approval of a Default Service Program : Docket No. P-2016-2526627  
and Procurement Plan for the Period June 1, :  
2017 through May 31, 2021 :

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**PREHEARING MEMORANDUM  
OF NOBLE AMERICAS ENERGY SOLUTIONS LLC**

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AND NOW, comes Noble Americas Energy Solutions LLC (“Noble”), by its attorney, and submits this Prehearing Memorandum in accordance with the First Prehearing Order of Administrative Law Judge Susan D. Colwell, dated February 6, 2016, and in connection with the initial Prehearing Conference scheduled to be held in the above-captioned matter on March 9, 2016.

**I. Introduction**

On January 29, 2016, PPL Electric Utilities Corporation (“PPL”) filed a petition seeking Commission approval of its fourth Default Service Program and Procurement Plan (“DSP IV Program”) to establish terms and conditions under which PPL will acquire and supply default service for a four-year period, from June 1, 2017 through May 31, 2021.

Noble timely filed a Petition to Intervene in this proceeding on February 29, 2016. Noble incorporates by reference the statements and information provided in its Petition to Intervene and respectfully requests that Judge Colwell grant its intervention.

**II. Counsel for Noble; Service List**

The name, business addresses, telephone and fax numbers, and email address of counsel for Noble are:

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Noble designates the above counsel for purposes of inclusion on the official service list. Noble also requests that, in addition to the above counsel, Becky Merola, Government Affairs East for Noble ([bmerola@noblesolutions.com](mailto:bmerola@noblesolutions.com)), be included on the informal email distribution list established for this proceeding.

**III. Issues**

Noble is in the process of identifying the issues it may pursue in this proceeding. Upon completing its review of PPL's filing and direct testimony, Noble may support, oppose, or propose modifications to PPL's proposed DSP IV Program. Noble reserves the right to present its position in accordance with the litigation schedule which will be finalized at the Prehearing Conference.

**IV. Witnesses**

Noble is in the process of identifying any potential witnesses it might call and the intended subject matter. Noble agrees to notify Judge Colwell and the parties whether it will be submitting direct testimony in this proceeding and reserves the right to submit rebuttal and surrebuttal testimony as it deems appropriate. Noble will comply with all deadlines established in the proceeding for the service of testimony.

**V. Proposed Procedural Schedule**

Noble has reviewed the procedural schedule set forth in Paragraph 7 of Judge Colwell's First Prehearing Order for the submission of testimony, hearings, and brief and accepts that

schedule without modification. Should adjustments to that schedule be required, Noble agrees to cooperate with Judge Colwell and the other parties at the Prehearing Conference to finalize an acceptable schedule.

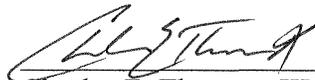
**VI. Discovery**

Noble will work with Judge Colwell and the other parties at the Prehearing Conference to develop a proposed plan and schedule of discovery, as well as any reasonable and appropriate modifications to the Commission's Rules of Practice and Procedure for the conduct of discovery as are necessary.

**VII. Settlement**

Noble will actively participate in settlement discussions as they may occur.

Respectfully submitted,



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*Counsel for Noble Americas Energy Solutions LLC*

DATED: March 4, 2016

## CERTIFICATE OF SERVICE

I hereby certify that I have this 4th day of March, 2016, served a true and correct copy of the foregoing Prehearing Memorandum of Noble Americas Energy Solutions LLC, upon the upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

### VIA FIRST CLASS MAIL AND ELECTRONIC MAIL

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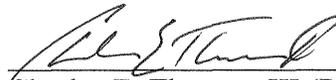
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