



COMMONWEALTH OF PENNSYLVANIA

March 7, 2016

E-FILED

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

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

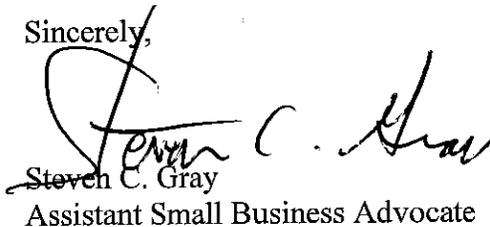
Dear Secretary Chiavetta:

I am delivering for filing today the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

Copies have been served on Administrative Law Judge Susan D. Colwell, as well as 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,


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

Enclosures

cc: The Honorable Susan D. Colwell
Parties of Record
Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**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.
Assistant Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 202
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 Program and Procurement Plan for the Period June 1, 2017 through May 31, 2021 (“Petition”) with the Commission on January 29, 2016. The OSBA filed an Answer and Notice of Intervention on February 29, 2016.

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 proposal for bi-annual rate changes and reconciliation remains reasonable.

5. Whether the Commission's decision to lower the limit for hourly default service to 100 kW in the Company's last default service proceeding has had a positive or negative effect on those customers;

6. Whether the Company's proposal to adopt a four year plan is just and reasonable.

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

IV. SERVICE OF DOCUMENTS

The OSBA requests that all parties serve a hard copy of any document filed upon the OSBA and the OSBA witness identified above. In addition to hard copies of pleadings and briefs, the OSBA requests hard 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

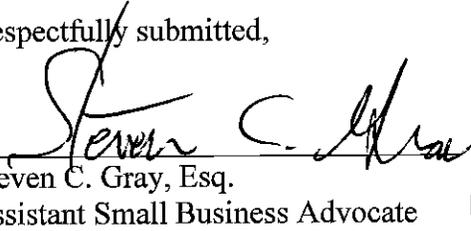
The OSBA does not propose any discovery modifications in this proceeding.

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,



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

Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

Dated: March 7, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email and/or first-class mail (unless other noted below) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Susan D. Colwell
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
scolwell@pa.gov
(Email and Hand Delivery)

Gina L. Lauffer, Esquire
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building, 2nd
Floor West
Harrisburg, PA 17120
ginlauffer@pa.gov
(Email and Hand Delivery)

Aron J. Beatty, Esquire
Brandon J. Pierce, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101
abeatty@paoca.org
bpierce@paoca.org
(Email and Hand Delivery)

David B. MacGregor, Esquire
Michael W. Hassell, Esquire
Christopher T. Wright, Esquire
Post & Schell
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dmacgregor@postschell.com
mhassell@postschell.com
cwright@postschell.com
(Email and US Mail)

Paul E. Russell, Esquire
Kimberly A. Klock, Esquire
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
perussell@pplweb.com
kklock@pplweb.com
(Email and US Mail)

Thomas J. Sniscak, Esquire
Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 N. 10th Street
Harrisburg, PA 17101
tjsniscak@hmslaw.com
tsstewart@hmslaw.com
(Email and US Mail)

Charles E. Thomas, III, Esquire
Thomas, Niesen & Thomas
212 Locust Street, Suite 600
Harrisburg, PA 17101
cet3@tntlawfirm.com
(Email and US Mail)

Pamela C. Polacek, Esquire
Adeolu A. Bakare, Esquire
McNees, Wallace & Nurick
PO Box 1166
Harrisburg PA 17108-1166
ppolacek@mwn.com
abakare@mwn.com
(Email and US Mail)

Daniel Clearfield, Esquire
Deanne M. O'Dell, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
dodell@eckertseamans.com
sstoner@eckertseamans.com
(Email and US Mail)

Kenneth L. Mickens, Esquire
316 Yorkshire Drive
Harrisburg, PA 17111-6933
kmickens11@verizon.net
(Email and US Mail)

Holly Rachel Smith, Esquire
Exelon Generation Company
100 Constellation Way, Suite 500C
Baltimore, MD 21202
holly.smith@exeloncorp.com
(Email and US Mail)

DATE: March 3, 2016



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