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March 7, 2016

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

**VIA ELECTRONIC FILING**

**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 please find for filing with the Pennsylvania Public Utility Commission the Prehearing Memorandum of the PP&L Industrial Customer Alliance ("PPLICA") 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. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By   
Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

c: Administrative Law Judge Susan D. Colwell (via E-mail and First Class Mail)  
Certificate of Service

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## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

Dated this 7<sup>th</sup> day of March, 2016, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities	:	
Corporation for Approval of a Default	:	
Service Program and Procurement	:	P-2016-2526627
Plan for the Period June 1, 2017	:	
Through May 31, 2021	:	

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**PREHEARING MEMORANDUM OF  
PP&L INDUSTRIAL CUSTOMER ALLIANCE**

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Pursuant to the February 2, 2016, Prehearing Conference Order issued by Administrative Law Judge Susan D. Colwell, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Prehearing Memorandum in the above-captioned proceeding.

**I. HISTORY OF THE PROCEEDING**

On January 29, 2016, PPL Electric Utilities Corporation ("PPL" or "Company"), filed its Petition seeking approval of its fourth Default Service Program and Procurement Plan ("DSP") for the period June 1, 2017, through May 31, 2021. The Company's DSP outlines a number of terms and conditions by which PPL will supply default service to non-shopping customers. This DSP would apply to all retail customers that reside within the Company's service territory.

On February 29, 2016, PPLICA filed a Petition to Intervene and Answer in this proceeding. A description of PPLICA is set forth in PPLICA's Petition to Intervene and Answer. PPLICA's Petition to Intervene and Answer is pending and awaits disposition by the ALJ. A Prehearing Conference has been scheduled in this proceeding for March 9, 2016.

## **II. ANTICIPATED ISSUES AND SUB-ISSUES**

PPLICA is concerned with the following issues:

- a) whether PPL's Petition, as filed, fully justifies its requested relief; and
- b) whether any party will seek to modify PPL's long-standing practices for collection of so-called Non-Market Based Transmission Services through the default service procurement process; and
- c) whether PPL's requested DSP is just, reasonable, and in the public interest.

PPLICA anticipates pursuing these issues during this proceeding and reserves the right to raise further issues, as well as to respond to all issues raised by other parties.

## **III. PROPOSED WITNESSES**

PPLICA is currently evaluating whether it will sponsor testimony in this proceeding. If PPLICA opts to sponsor testimony, it will immediately inform the parties and the ALJ of any intended witnesses and their areas of testimony. PPLICA also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

## **IV. PROPOSED SCHEDULE AND DISCOVERY RULES**

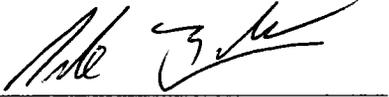
PPLICA will cooperate with other parties to develop a mutually acceptable schedule for discovery and testimony. To the extent necessary, PPLICA will also cooperate with the ALJ and the parties at the Prehearing Conference to address any requested modifications to the Commission's standard discovery rules in accordance with the Commission's Regulations and any directives issued by the ALJs.

**V. POSSIBILITY OF SETTLEMENT**

PPLICA is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: March 7, 2016