

Exhibit A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**JOINT LITIGATION POSITION AMONG
CERTAIN PARTIES REGARDING CAP SHOPPING**
(Corrected)

TO THE HONORABLE ADMINISTRATIVE LAW
JUDGE SUSAN D. COLWELL:

I. INTRODUCTION

PPL Electric Utilities Corporation (“PPL Electric”), the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”), the Office of Consumer Advocate (“OCA”), and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), parties to the above-captioned proceeding (collectively “Joint Parties”),¹ hereby file this “Joint Litigation Position Among Certain Parties Regarding CAP Shopping” (“Joining Position”), and respectfully request that Administrative Law Judge Susan D. Colwell (“ALJ”) and the Commission adopt the proposal contained herein with respect to a revised, temporary mechanism for Customer Assistance Program (“CAP”) customers to shop on PPL Electric’s system, pending a future, state-wide proceeding to examine issues related to CAP customer shopping. The terms of the Joint Position are set forth below.

¹ The Office of Small Business Advocate (“OSBA”), NextEra Energy Power Marketing, LLC, PP&L Industrial Customer Alliance (“PPLICA”), Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”), Noble Americas Energy Solutions, LLC and Exelon Generation Company are not parties to and take no position on this Joint Position. Retail Energy Supply Association (“RESA”) does not support this Joint Litigation Position and reserves its rights to litigate the issue of CAP customer shopping.

II. JOINT LITIGATION POSITION

1. The Joining Parties hereby agree and adopt as their litigation position the revised CAP shopping proposal as set forth in PPL Electric Statement No. 1-RJ, the Rejoinder Testimony of PPL Electric Witness James M. Rouland, found on page 6, line 21 through page 9 line 7. To the extent that other proposals presented through the litigation are inconsistent, the Joining Parties further agree to forego other CAP shopping proposals in lieu of the CAP shopping proposal set forth in PPL Electric Statement No. 1-RJ at 6:21 - 9:7. To eliminate doubt, the specific terms of that CAP shopping proposal are restated here.

2. The Joining Parties agree that the Commission should promptly initiate a statewide collaborative open to all interested stakeholders and/or initiate a new rulemaking proceeding to address CAP shopping issues on a uniform, statewide basis.

3. PPL Electric agrees to fully participate in any such collaborative and/or rulemaking proceeding, and to present a specific CAP shopping proposal to address the impacts of CAP shopping on both CAP and non-CAP customers.

4. The Joining Parties agree that, until a uniform, statewide solution to CAP shopping can be developed, PPL Electric shall implement a CAP Standard Offer Program ("CAP-SOP"), effective June 1, 2017, with the following features designed to help mitigate the impacts that CAP shopping can have on CAP credits, risk of early removal from the OnTrack program, and the CAP costs that are paid for by other Residential customers through the Universal Service Rider:

- (a) The CAP-SOP is the only vehicle that a CAP customer may use to shop and receive supply from an EGS.

(b) Any CAP customer shopping request that does not get processed through the CAP-SOP will be denied.

(c) EGSs participating in the CAP-SOP must agree to serve customers at a 7% discount off the PTC at the time of enrollment. This price shall remain fixed for the 12-month CAP-SOP contract unless terminated earlier by the customer.

(d) CAP customers may terminate the CAP-SOP contract at any time and without any termination or cancellation fees or other penalties.

(e) A CAP customer who terminates a CAP-SOP contract or whose CAP-SOP contract reaches the end of its term can re-enroll in the CAP-SOP.

(f) At the conclusion of a 12-month CAP-SOP contract, the CAP customer will be returned to the CAP-SOP pool and be re-enrolled in a new CAP-SOP contract, unless the CAP customer requests to be returned to default service or is no longer a CAP customer.

(g) EGSs must enroll separate from the standard SOP to be a participating supplier in the CAP-SOP. EGSs would be free to voluntarily elect to participate in none, one or the other, or both the traditional SOP and the proposed CAP-SOP. Enrollment will be for a three-month period, and shall conform to the enrollment process for the standard SOP. EGS may opt in to participate in the CAP-SOP on a quarterly basis, and are free to leave the CAP-SOP on a quarterly basis.

5. For the purpose of transitioning CAP customers who are shopping as of the CAP-SOP June 1, 2017 effective date:

(a) All CAP customer shopping fixed-term contracts in effect as of the effective date of the CAP-SOP will remain in place until the contract term expires and/or is terminated.

(b) Once the existing CAP customer shopping contract expires or is terminated, the CAP customer will have the option to enroll in the CAP-SOP or return to default service, but in any event will only be permitted to shop through the CAP-SOP.

(c) PPL Electric will revise its CAP recertification scripts/process so that all existing CAP shopping customers receiving generation supply on a month-to-month basis after June 1, 2017 will be required at the time of CAP recertification to enroll in the CAP-SOP or return to default service, but in any event will only be permitted to shop through the CAP-SOP.

6. Within 90 days of the date of a final order in this proceeding, PPL Electric will hold a collaborative open to all interested parties to develop CAP-SOP specific scripts to be used by the Company's Customer Service Representatives and PPL Solutions.

7. Until a uniform, statewide approach to CAP shopping can be developed, the parties reserve the right to petition the Commission to re-open the CAP-SOP in the event that there is no EGS participation in the program and/or there are changes in retail market conditions that would otherwise justify reopening the CAP-SOP.

III. CONCLUSION

WHEREFORE, PPL Electric, I&E, OCA, and CAUSE-PA, by their respective counsel, request that the ALJ and the Commission adopt this Joint Litigation Position Among Certain Parties Regarding CAP Shopping.

Respectfully submitted,



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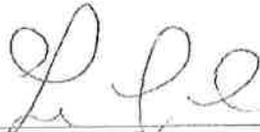
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CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Main Brief of the Bureau of Investigation and Enforcement** dated July 8, 2016, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

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