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May 8, 2017

VIA ELECTRONIC FILING

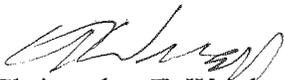
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation for Approval of 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 the Petition of PPL Electric Utilities Corporation for Leave to Withdraw Its Petition to Amend the Implementation Date of the Customer Assistance Program Standard Offer Referral Program in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Christopher T. Wright

CTW/skr
Enclosure

cc: 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 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

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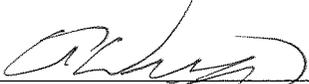
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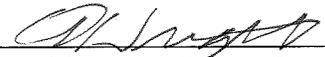
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.94(a), YOU MAY FILE AN OBJECTION TO THE ENCLOSED PETITION FOR LEAVE TO WITHDRAW WITHIN TEN (10) DAYS AFTER THE DATE OF SERVICE. YOUR OBJECTION SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR OBJECTION SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Dated: May 8, 2017

Attorneys for PPL Electric Utilities Corporation

**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 :

**PETITION OF PPL ELECTRIC UTILITIES CORPORATION
FOR LEAVE TO WITHDRAW ITS PETITION TO AMEND
THE IMPLEMENTATION DATE OF THE
CUSTOMER ASSISTANCE PROGRAM
STANDARD OFFER REFERRAL PROGRAM**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code § 5.94(a), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby petitions to withdraw the “Petition Of PPL Electric Utilities Corporation For Approval To Amend The Implementation Date Of The Customer Assistance Program Standard Offer Referral Program” (hereinafter the “Petition to Amend”). In its Petition to Amend, PPL Electric sought to modify the implementation date for the Customer Assistance Program Standard Offer Referral Program (“CAP-SOP”) from June 1, 2017 to September 1, 2017 in order to have additional time to fully complete the system changes necessary to implement the CAP-SOP. Recently, PPL Electric determined that it can fully complete the system changes necessary to implement the CAP-SOP by the June 1, 2017 effective date. Therefore, the Petition to Amend is no longer necessary and PPL Electric respectfully requests that it be withdrawn. In support thereof, PPL Electric States as follows:

1. This Petition is filed by PPL Electric, a public utility subject to the regulatory jurisdiction of the Pennsylvania Public Utility Commission (“Commission”). PPL Electric furnishes electric distribution, transmission and default supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

2. PPL Electric is a “public utility,” an “electric distribution company” (“EDC”) and a “default service provider” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803.

3. On January 29, 2016, PPL Electric filed a Petition requesting Commission approval of its proposed fourth Default Service Program and Procurement Plan (“DSP IV Program”). As part of its filing, PPL Electric also introduced a proposal to mitigate the impacts of shopping by customers enrolled in its Customer Assistance Program (“CAP”).

4. As a result of settlement discussions, the active parties were able to achieve a partial settlement in principle prior to the June 16, 2016 evidentiary hearings. This partial settlement resolved all the issues and concerns raised by the active parties in the proceeding except shopping by customers enrolled in PPL Electric’s CAP, which was reserved for litigation.

5. In addition, prior to the June 16, 2016 evidentiary hearing, PPL Electric, the Commission’s 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”) entered into a Joint Litigation Position that: (i) withdrew the three separate CAP shopping proposals originally proposed by PPL Electric, OCA, and CAUSE-PA; and (ii) supported a single revised CAP shopping proposal set forth in PPL Electric’s rejoinder

testimony, the CAP-SOP. Pertinent to this petition, the Joint Litigation Position proposed that, if adopted by the Commission, the CAP-SOP would become effective June 1, 2017.

6. An evidentiary hearing was held on June 16, 2016. The active parties agreed to waive cross examination, and moved their respective testimonies and exhibits into the record.

7. On July 19, 2016, a Joint Petition for Partial Settlement (“Settlement”) was filed to resolve all issues raised in the proceeding, except for the reserved issue of shopping by customers enrolled in PPL Electric’s CAP.¹

8. Certain parties submitted initial and reply briefs on the reserved issue of shopping by customers enrolled in PPL Electric’s CAP.

9. By Secretarial Letter dated August 17, 2016, the Commission issued the Initial Decision (“ID”) of Administrative Law Judge Susan D. Colwell. Pertinent to the pending Petition, the ID recommended the CAP-SOP shopping proposal be adopted, including the proposed June 1, 2017 effective date.²

10. On October 27, 2016, the Commission issued an Opinion and Order in the DSP IV Program proceeding that approved the Settlement and adopted the CAP-SOP jointly proposed by PPL Electric, I&E, OCA, and CAUSE-PA. *See 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 (Order entered Oct. 27, 2016) (“*DSP IV*”).

¹ PPL Electric, I&E, OCA, the Office of Small Business Advocate (“OSBA”), PP&L Industrial Customer Alliance (“PPLICA”), Retail Energy Supply Association (“RESA”), and Exelon Generation Company, LLC (“ExGen”) were Signatory Parties to the Settlement. CAUSE-PA, the Sustainable Energy Fund (“SEF”), NextEra Energy Power Marketing, LLC (“NextEra”), and Noble Americas Energy Solutions LLC (“Noble”) were not parties to the Settlement but indicated that they do not object.

² The ID recommended that the CAP-SOP be adopted with one modification. Specifically, the ID recommended a third, new option be added when a CAP customer reached the end of their 12-month CAP-SOP contract. Following consideration of the parties’ exceptions, the Commission declined to adopt the ID’s recommended modification to the CAP-SOP.

Order”). Pertinent to the pending Petition, the Commission directed that the CAP-SOP become effective June 1, 2017. *See DSP IV Order*, Ordering Paragraph 14.a.

11. On November 14, 2016, RESA filed a Petition for Reconsideration, which was ultimately denied by Order entered January 26, 2017.

12. On February 27, 2017, RESA filed a Petition for Review of the Commission’s *DSP IV Order*, with respect to the Commission’s approval of the CAP-SOP. *RESA v. Pa. P.U.C.*, 230 CD 2017. As of the date of this filing, RESA has not sought a stay of the implementation of the CAP-SOP.³

13. On March 10, 2017, PPL Electric filed the Petition to Amend, requesting that the implementation date of its CAP-SOP be modified from June 1, 2017 to September 1, 2017. As explained in the Petition to Amend, PPL Electric initially believed that additional time would be required to design, complete, and test the information technology (“IT”) and programmatic changes necessary to implement the CAP-SOP. As of the date of this filing, the Commission has not acted or otherwise ruled on the Petition to Amend.

14. PPL Electric has continued to evaluate and take the steps necessary to design, complete, and test the IT and programmatic changes necessary to implement the CAP-SOP. As a result of these efforts, PPL Electric has determined that it can fully complete and implement

³ The automatic supersedeas under Pa. R.A.P. 1736(b) does not apply to petitions for review filed under Chapter 15 of the Pennsylvania Rules of Appellate Procedure. *See Colston v. Department of Community Affairs*, 521 A.2d 513, 514-15 (Pa. Cmwlth. 1987) (had the Supreme Court intended that the provisions of Rule 1736(b) to apply to petitions for review, it could and would have so provided); *Department of Auditor General v. Council 13, American Federation of State, County & Municipal Employees*, 573 A.2d 233, 234 (Pa. Cmwlth. 1990) (“Pa. R.A.P. 1736 applies to appeals from trial courts, not to petitions for review, which are governed as to supersedeas by Pa. R.A.P. 1781.”). Rather, the rules applicable to stays pending action on petitions for review expressly require an order approving an application for a stay or supersedeas. Pa. R.A.P. 1781.

the CAP-SOP by the original June 1, 2017 effective date adopted in the *DSP IV Order*.⁴ Therefore, the Petition to Amend and the request therein to modify the effective date of the CAP-SOP are unnecessary.

15. Not only is the Petition to Amend unnecessary, it could cause significant customer confusion if it was granted at this point. Because the Commission has not acted on PPL Electric's Petition to Amend and the CAP-SOP has not been stayed, PPL Electric has continued its efforts to fully implement the CAP-SOP by June 1, 2017 effective date adopted in the *DSP IV Order*, including, but not limited to, communications with suppliers. Importantly, PPL Electric plans to immediately begin communication and education efforts with applicable customers in order to ensure they are aware of and understand the CAP-SOP by the June 1, 2017 effective date. PPL Electric submits that significant customer confusion regarding the CAP-SOP and its effective date would be caused if the Petition to Amend was not withdrawn at this time.

16. Based on the foregoing, PPL Electric hereby seeks to withdraw the Petition to Amend in its entirety pursuant to 52 Pa. Code § 5.94(a).

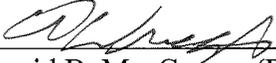
17. A copy of this Petition is being served on all active parties to the DSP IV Program proceeding as indicated on the attached Certificate of Service.

⁴ PPL Electric acknowledges that on April 25, 2017, RESA submitted a letter in support of PPL Electric's request to extend the implementation date of the CAP-SOP. Therein, RESA identified three operational concerns with the CAP-SOP that RESA believes need to be addressed before the CAP-SOP effective date. PPL Electric held a conference call with suppliers on April 25, 2017, to address and resolve concerns related to the implementation of the CAP-SOP, which included those issues raised in RESA's April 27, 2017 letter. PPL Electric will continue to work with suppliers to address future concerns and questions, if any, regarding the implementation of the CAP-SOP.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that Pennsylvania Public Utility Commission grant this Petition and permit PPL Electric to withdraw the Petition Of PPL Electric Utilities Corporation For Approval To Amend The Implementation Date Of The Customer Assistance Program Standard Offer Referral Program in its entirety.

Respectfully submitted,

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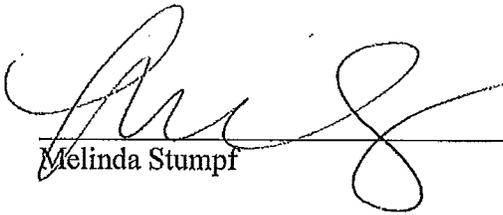

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Dated: May 8, 2017

Attorneys for PPL Electric Utilities Corporation

VERIFICATION

I, Melinda Stumpf, being the Manager of Regulatory Programs and Business Services at PPL Electric Utilities Corporation, hereby state that the facts set forth above are true and correct and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



Melinda Stumpf