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File #: 157102

September 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

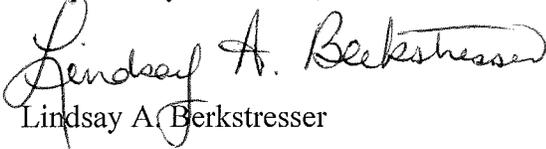
Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2017 through May 31, 2021 - Docket No. P-2016-2526627

Petition of PPL Electric Utilities Corporation for Approval of a New Pilot Time-of-Use Program - Docket Nos. P-2013-2389572 and M-2016-2578051

Dear Secretary Chiavetta:

Enclosed please find the Prehearing Memorandum on behalf of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,


Lindsay A. Berkstresser

LAB/skr
Enclosure

cc: Honorable Joel H. Cheskis
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).

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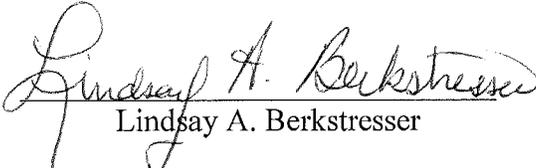
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Date: September 8, 2017


Lindsay A. Berkstresser

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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
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Petition of PPL Electric Utilities Corporation for Approval of a New Pilot Time-of-Use Program	:	Docket Nos.	P-2013-2389572 M-2016-2578051
	:		

**PREHEARING MEMORANDUM OF
PPL ELECTRIC UTILITIES CORPORATION**

TO ADMINISTRATIVE LAW JUDGE JOEL H. CHESKIS:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), pursuant to 52 Pa. Code § 5.222(d), and in compliance with the Prehearing Order issued by Administrative Law Judges Joel Cheskis on August 28, 2017, hereby files this Prehearing Memorandum in the above-captioned matter, and states as follows:

I. PROCEDURAL HISTORY

1. On June 1, 2017, PPL Electric filed a Petition requesting Pennsylvania Public Utility Commission (“Commission”) approval of a new Pilot Time-of-Use (“TOU”) Program. PPL Electric filed its Petition pursuant to 52 Pa. Code § 5.41 and in compliance with the Commission’s Secretarial Letter dated April 6, 2017 in *Petition of PPL Electric Utilities Corporation for Approval of a New Pilot Time-of-Use Program*, Docket Nos. P-2013-2389572 and M-2016-2578051, and *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, which required the Company to file a new TOU proposal on or before June 1, 2017.

2. Previously, on August 23, 2013, PPL Electric filed a petition requesting Commission approval of a Pilot TOU Program. By Order entered September 11, 2014, the Commission approved the Pilot TOU Program. *Petition of PPL Electric Utilities Corporation for Approval of a New Pilot Time-of-Use Program*, Docket No. P-2013-2389572 (Order entered September 11, 2014) (*September 2014 Order*). Thereafter, Dauphin County Industrial Development Authority appealed the *September 2014 Order*. In *Dauphin County Industrial Development Authority v. Pa. PUC*, 123 A.3d 1124 (Pa. Cmwlth. 2015) (*DCIDA*), the Commonwealth Court of Pennsylvania (“Commonwealth Court”) reversed and remanded the Commission’s Order. In response to the Commonwealth Court’s *DCIDA* Order, on December 2, 2016, the Commission issued a Secretarial Letter inviting interested parties to submit written comments regarding the Commission’s intent to initiate a proceeding to comply with the directives arising from the Commonwealth Court’s *DCIDA* Order. Subsequently, the Commission issued its April 6, 2017 Secretarial Letter providing guidance for the Company’s new TOU Proposal to be filed on or before June 1, 2017.

3. Under the terms of the proposed new Pilot TOU Program filed on June 1, 2017, PPL Electric’s Commission-approved tariff will include a primary default service TOU rate option, under which the TOU rates and services will be provided by the Company, as the Default Service Provider, through purchases from a single wholesale supplier, per customer class, selected pursuant to a competitive bid protocol. PPL Electric’s proposal is subject to Commission approval and will be part of the Company’s retail tariff once approved. The June 1,

2017 Petition includes a detailed description of the Pilot TOU Program, details regarding wholesale supplier and customer participation, and a contingency proposal.

4. Answers in response to the June 1, 2017 Petition were filed by the Office of Small Business Advocate, the Office of Consumer Advocate, the Sustainable Energy Fund, the Dauphin County Industrial Development Authority and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania.

5. A further prehearing conference has been scheduled for September 15, 2017 at 10:00 a.m.

II. SERVICE OF DOCUMENTS

6. PPL Electric requests that all documents be served on:

Michael W. Hassell (PA ID # 34851)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6029
Fax: 717-731-1985
E-mail: mhassell@postschell.com

7. PPL Electric agrees to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies be served upon:

David B. MacGregor - dmacgregor@postschell.com
Lindsay A. Berkstresser - lberkstresser@postschell.com
Kimberly A. Klock - kklock@pplweb.com
Amy E. Hirakis - aehirakis@pplweb.com

8. PPL Electric's attorneys are authorized to accept service on behalf of the Company in this proceeding. PPL Electric requests that the Commission and all parties of record serve copies of all discovery requests and answers, correspondence, Commission Orders, and

any other documents issued in this proceeding on its attorneys at the address and via the email addresses stated above.

III. DISCOVERY

9. PPL Electric has responded, and continues to respond, to interrogatories that have been served upon the Company in this proceeding. PPL Electric encourages the use of informal discovery to expedite the discovery process.

10. Based upon past experience, PPL Electric believes that a protective order may be appropriate with regard to discovery in this proceeding. PPL Electric reserves the right to request a protective order to limit the disclosure of trade secrets or other confidential information.

11. PPL Electric proposes that discovery be conducted within the timeframe provided in the proposed procedural schedule.

IV. PROCEDURAL SCHEDULE

12. PPL Electric proposes the following procedural schedule:

Prehearing Conference – September 15, 2017

PPL Electric Direct – November 6, 2017

Other Parties' Direct – December 12, 2017

Rebuttal – January 9, 2018

Surrebuttal – January 16, 2018

Hearing – January 30, 2018

Main Brief – February 20, 2018

Reply Brief – March 13, 2018

13. All dates are for in-hand delivery. The Company proposes that electronic mail for receipt and distribution of testimony and exhibits will satisfy in-hand service dates, with follow-up hard copies provided by first class mail.

V. WITNESSES AND ISSUES

14. The witnesses that PPL Electric expects to call and the subject matter of their testimony are as follows:

- **James M. Rouland** - Supervisor - Energy Procurement, PPL Electric Utilities Corporation. Two North Ninth Street, Allentown, Pennsylvania 18101. 610-774-3042. Mr. Rouland will address the following topics in his testimony: Description and implementation of the Pilot TOU Program and the proposed Contingency Plan.
- **Scott Koch** - Regulatory Operations Supervisor, PPL Electric Utilities Corporation. Two North Ninth Street, Allentown, Pennsylvania 18101. 610-774-2070. Mr. Koch will address the following topics in his testimony: Proposed tariffs and Reconciliation.

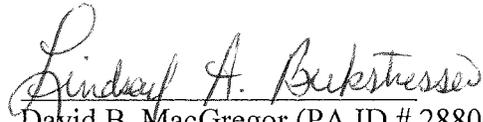
15. PPL Electric reserves the right to substitute witnesses or add witnesses, as appropriate, depending upon the issues raised and witnesses presented by other parties in the proceeding.

16. The primary issue in this proceeding is whether the proposed new Pilot TOU Program, including the proposed contingency plan, as proposed by PPL Electric on June 1, 2017, is reasonable and appropriate. It is PPL Electric's position that the proposed new Pilot TOU Program, including the contingency plan, is reasonable and appropriate, complies with the Commission's directives in the April 6, 2017 Secretarial Letter, and should be approved.

VI. SETTLEMENT

17. At this time, the parties have not discussed the possibility of settlement. However, PPL Electric will be working with the parties in an effort to resolve these proceedings through settlement.

Respectfully submitted,



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Dated: September 8, 2017

Attorneys for PPL Electric Utilities Corporation