

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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October 17, 2013

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17101

Re: PPL Electric Utilities Corporation Proposed
Transmission Service Charge Reconciliation for the
12 months ended November 30, 2010
Docket No. M-2010-2213754

PPL Electric Utilities Corporation Transmission
Service Charge Effective June 1, 2011
Docket No. M-2011-2239805

Dear Secretary Chiavetta:

Enclosed for filing please find the Office of Consumer Advocate's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served upon all parties of record as shown on the attached Certificate of Service.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Aron J. Beatty".

Aron J. Beatty
Assistant Consumer Advocate
PA Attorney I.D. # 86625

Enclosures

cc: Honorable Susan D. Colwell, ALJ
Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corp.	:	
Proposed Transmission Service Charge	:	M-2010-2213754
Reconciliation for the Twelve Months Ended	:	
November 30, 2010	:	
	:	
	:	
	:	
PPL Electric Utilities Corp.	:	M-2011-2239805
Transmission Service Charge Effective	:	
June 1, 2011	:	

PREHEARING MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to Section 333 of the Public Utility Code, 66 Pa. C.S. § 333 and the Prehearing Conference Order issued by Administrative Law Judge (ALJ) Susan D. Colwell on September 27, 2013, the Office of Consumer Advocate (OCA) provides the following information:

I. INTRODUCTION

This proceeding flows from PPL Electric Utilities Corporation's (PPL or Company) development of rates for transmission service needed to serve default service customers. The Company recovers these transmission costs through its Transmission Service Charge (TSC). The OCA filed its Notice of Intervention in the Company's annual 2010 TSC reconciliation proceeding (Docket No. M-2010-2213754) on June 3, 2011.

On August 15, 2013, the Pennsylvania Public Utility Commission entered an Order (the August 15 Order) in the above-captioned docket in which it resolved "three open matters"

concerning the operation of PPL's TSC. August 15 Order at 24. The first issue addressed in the August 15 Order was PPL's use of 2009 historical allocators for its reconciliation of 2010 TSCd revenues. August 15 Order at 24-25. The Commission determined that the 2010 reconciliation method used by PPL for calculation of the TSC should remain in place. August 15 Order at 25.

The second and third issues concerned the disbursal of refunds owed to large C&I customers. August 15 Order at 24. The Commission stated that these two issues were partially resolved by the Order, "but also referred to OALJ for preparation of a recommended decision relative to the particulars of the refunds such as: correct amounts to be refunded, interest calculations, timing of refunds, customers receiving the refunds, and customers that cannot be located." Id. The Commission ordered PPL to file a refund plan within 30 days of entry of the August 15 Order, and for the plan to be referred to the Office of Administrative Law Judge to adjudicate any disagreement among the parties as to the amount of funds in question, interest, timing of refunds, identity and location of the customers involved, and customers that cannot be found. August 15 Order at 28-29. The Company filed its refund plan on September 16, 2013.

On August 30, 2013, PPL filed a Petition for Reconsideration of the Commission's August 15 Order insofar as it denied the Company permission to recover costs associated with the refund process that were related to PPL's "billing error." Also on August 30, 2013, the PP&L Industrial Customer Alliance (PPLICA) filed a Petition for Reconsideration and/or Clarification of the August 15 Order concerning the Company's use of estimated TSC costs in its 2010 TSC reconciliation. A reply to the PPLICA Petition was filed by the Office of Small Business Advocate on September 9, 2013.

On September 27, 2013, ALJ Colwell issued a Prehearing Order in this matter, setting a Prehearing Conference on October 21, 2013. The OCA submits this Prehearing Memorandum in

anticipation of the scheduled October 21st Prehearing Conference in compliance with the ALJ's Prehearing Order.

II. ISSUES

In its August 15 Order, the Commission referred the Large C&I refund issue to the Office of Administrative Law Judge for hearing and decision. August 15 Order at 30. The OCA does not take a position on how the Company provides these refunds to large C&I customers. The OCA is participating in this proceeding to ensure that the interests of residential customers are represented should issues arise that would impact residential TSC rates. The OCA reserves the right to address issues raised by other parties.

III. WITNESSES

The OCA has not identified a witness in this proceeding at this time. If issues arise that require the OCA to present expert testimony, the OCA will notify the ALJ and parties immediately.

IV. SERVICE ON THE OCA

The OCA will be represented in this case by Assistant Consumer Advocates Aron J. Beatty and Brandon J. Pierce. Two copies of the documents should be served on the OCA as follows:

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V. PROPOSED REVISED RULES / DISCOVERY

The OCA has not served discovery and is not proposing any modifications to the Commission's Regulations concerning discovery.

VI. PROPOSED SCHEDULE

The OCA supports the proposed schedule contained in the Company's Prehearing Memorandum.

VII. SETTLEMENT DISCUSSIONS

At present, settlement discussions have not been scheduled. The OCA will fully participate in any proposed settlement discussions throughout the course of this proceeding.

Respectfully Submitted,



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Dated: October 17, 2013

CERTIFICATE OF SERVICE

Re: PPL Electric Utilities Corporation Proposed Transmission Service Charge Reconciliation for the 12 months ended November 30, 2010
Docket No. M-2010-2213754

PPL electric Utilities Corporation Transmission Service Charge Effective June 1, 2011
Docket No. M-2011-2239805

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Prehearing Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 17th day of October 2013.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

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