

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2015-2469275
	:	
Petition of PPL Electric Utilities Corporation	:	

**Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy
Efficiency in Pennsylvania (CAUSE-PA)**

On April 22, 2015, a Prehearing Conference Order was issued by the Honorable Susan D. Colwell, Administrative Law Judge. The Order set forth specifications to direct the course of litigation and ordered parties to provide information about certain aspects of the proceedings to be resolved at the Prehearing Conference, scheduled for May 7, 2015. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Conference Memorandum.

I. Background

On March 31, 2015, PPL Electric Utilities Corporation (“PPL”) submitted a rate filing, Supplement No. 179 to PPL Electric Tariff – Electric PA. P.U.C. No. 201, which proposes to increase its distribution revenue by approximately \$167.5 million, which equates to an average increase in distribution rates of 18.5% and an overall increase of approximately 3.9%. In addition, Supplement No. 179 contains revisions and modifications to PPL’s currently effective tariff.

On April 20, 2015, CAUSE-PA filed a Petition to Intervene and Answer. On April 23, 2015, the Commission entered an order suspending the implementation of Supplement No. 179 by operation of law until January 1, 2016, and opening an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained in proposed Supplement No. 179.

II. Issues to be Presented

In addition to complying with sound rate making principles, including the requirement that rates be just and reasonable, PPL must also ensure that its rates and tariff comply with universal service requirements. In turn, the Commission must ensure that universal service programs assist low-income customers to afford electric service, and that these programs are appropriately funded and available in each natural gas distribution territory. 66 Pa. C.S. § 2203(8).

In the event that the Commission approves any electric distribution rate increase, the Commission should condition approval on PPL's agreement to perform such actions as are necessary to assure compliance with applicable sections of the Public Utility Code, Commission regulations and guidelines, and settlement agreements.

CAUSE-PA has conducted an initial review of PPL's proposed tariff changes and testimony, and it opposes PPL's request on the grounds that the proposed rate increase and tariff changes may result in unjust and unreasonable rates that would impose severe hardship on low and moderate income residential customers. The following specific issues of concern must be addressed in this proceeding:

- i. The conformity to law and the effect of PPL's rate filing and proposed rate increase – and specifically the increased customer charge – on low and lower income households; and,
- ii. The conformity to law, adequacy and effect on low income households enrolled in PPL's current Universal Service Programs.

III. Witnesses and Testimony

CAUSE-PA reserves the right to present the following witness to testify in this matter, as well as the right to call additional witnesses as may be warranted upon proper notice to Your Honor and the parties:

Mitchell Miller
Mitch Miller Consulting LLC
60 Geisel Road
Harrisburg, PA 17112
717-903-2196
Mitchmiller77@hotmail.com

Mr. Miller will address the issues identified above and any other issues that may arise in the course of this proceeding.

IV. Proposed Schedule

All parties of record as of the time of filing this Prehearing Memo have preliminarily agreed to the following proposed schedule:

- June 2, 2015: Public Input Hearings
- June 23, 2015: Direct of Other Parties
- *July 1, 2015:* *First Settlement Conference Deadline*
- July 20, 2015: Rebuttal
 - Best Effort to Submit by Noon
- *July 28, 2015:* *Second Settlement Conference Deadline*
- July 31, 2015: Surrebuttal
- August 6-7 & 10-11, 2015: Evidentiary Hearings
- September 1, 2015: Main Brief
- September 11, 2015: Reply Brief
- October 16, 2015: Recommended Decision
- December 17, 2015: PUC Public Meeting

CAUSE-PA asks that this schedule be approved, as it was carefully crafted through negotiation between the parties to avoid several irreconcilable scheduling conflicts, while ensuring parties sufficient time to develop a complete record, negotiate settlement, and draft supportive briefs.

Due consideration was also given to allot sufficient time for Your Honor to review the record and briefs and to issue a Recommended Decision to the Commission within the established time-frames.

In the event the agreed schedule is not adopted, CAUSE-PA respectfully requests that the evidentiary hearings be scheduled for August 5-7, so as not to conflict with the dates scheduled for other hearings on similar matters before the Commission to which CAUSE-PA is a party. The evidentiary hearings in Pa. PUC v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2015-2468056, are scheduled for August 4-5 and August 10, and the evidentiary hearings in the Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2014-2016, at Docket No. P-2014-2459362, are scheduled for August 11-14. CAUSE-PA is a party in both of these proceedings, and counsel for CAUSE-PA is, thus, unavailable to attend evidentiary hearings for this proceeding on those dates.

V. Discovery

CAUSE-PA supports the modified discovery rules proposed by the Office of Consumer Advocate.

VI. Public Input Hearings

CAUSE-PA supports the commencement of at least one public input hearing, as outlined by the Office of Consumer Advocate in its Prehearing Memorandum. CAUSE-PA plans to attend any and all public input hearings as an active party to ensure that testimony provided by the public is fully developed for the record.

VII. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions with any and all parties in an attempt to resolve or narrow the issues in this proceeding, and encourages the parties to engage in settlement early in the process.

VIII. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. Electronic service and one hard copy of all documents should be served on CAUSE-PA as follows:

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WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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May 1, 2015

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Prehearing Memorandum of CAUSE-PA**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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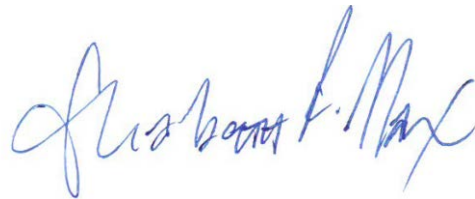
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Respectfully submitted,

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Date: May 1, 2015