COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE 555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560

FAX (717) 783-7152 consumer@paoca.org

February 29, 2016

Rosemary Chiavetta, Secretary PA Public Utility Commission Commonwealth Keystone Bldg. 400 North Street Harrisburg, PA 17120

> 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:

Attached for electronic filing please find the Office of Consumer Advocate's Answer, Notice of Intervention, and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

<u>/s/ Brandon J. Pierce</u> Brandon J. Pierce Assistant Consumer Advocate PA Attorney I.D. #307665 E-Mail: BPierce@paoca.org

Attachment

cc: Office of Administrative Law Judge Certificate of Service

217800

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

:

:

٠

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 Nos. P-2016-2526627

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate

hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence, notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Aron J. Beatty Senior Assistant Consumer Advocate PA Attorney I.D. No. 86625 E-mail: <u>abeatty@paoca.org</u>

Brandon J. Pierce Assistant Consumer Advocate PA Attorney I.D. #307665 E-Mail: BPierce@paoca.org

Office of Consumer Advocate 5th Floor, Forum Place 555 Walnut Street Harrisburg, Pa. 17101-1923 Telephone: (717) 783-5048

Respectfully submitted,

<u>/s/ Brandon J. Pierce</u> Brandon J. Pierce Assistant Consumer Advocate PA Attorney I.D. #307665

Date: February 29, 2016

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file an Answer and intervene in the proceedings before the Commission involving PPL Electric Utilities Corporation (PPL or the Company).

On January 29, 2016, PPL filed with the Commission a Petition for approval of their Default Service Plan (Petition) for its generation customers. The Companies' existing Default Service plan is set to expire on May 31, 2017. The proposed Default Service Plan is for the period of June 1, 2017 through May 31, 2021. In its Petition, the Company proposes to acquire supply for residential customers through fixed price, load-following, full requirements contracts, or "tranches." The Company proposes to acquire six-month and twelve-month tranches for all new supply needed to meet its residential default service obligation during DSP IV. The procurement will be approximately 50% six-month contracts and 50% twelve-month contracts with the exception of the long-term 50 MW block product for the residential class.

The Consumer Advocate determined to intervene in this proceeding to protect the interests of the Companies' residential customers. The Consumer Advocate will seek to ensure that any default service rates that are approved as a result of this proceeding are just and reasonable, consistent with Pennsylvania law and meet the requirements of Act 129.

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following documents, the Office of Consumer Advocate's Answer, Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons

listed below:

Dated this 29th day of February 2016.

SERVICE BY HAND DELIVERY and FIRST CLASS MAIL

Gina L. Lauffer, Esquire Bureau of Investigation & Enforcement 400 North Street Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

David B. MacGregor, Esquire Christopher T. Wright, Esquire Michael W. Hassell, Esquire Post & Schell PC 17 North Second Street 12th Floor Harrisburg, PA 17101

Paul E. Russell, Esquire Kimberly A. Klock, Esquire PPL Electric Utilities Corporation 2 North Ninth Street Allentown, PA 18101 John Evans, Small Business Advocate Office of Small Business Advocate Commerce Building, Suite 1102 300 North Second Street Harrisburg, PA 17101

Todd S. Stewart, Esquire Hawke McKeon and Sniscak, LLP 100 North 10th Street Harrisburg, PA 17101 *Counsel for NextEra Energy Power Marketing, LLC* Kenneth L. Mickens, Esquire 316 Yorkshire Drive Harrisburg, PA 17111 *Counsel for Sustainable Energy Fund*

/s/ Brandon J. Pierce Brandon J. Pierce Assistant Consumer Advocate PA Attorney I.D. #307665 E-Mail: BPierce@paoca.org

Aron J. Beatty Senior Assistant Consumer Advocate PA Attorney I.D. # 86625 E-Mail: ABeatty@paoca.org

Counsel for Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 Phone: (717) 783-5048 Fax: (717) 783-7152 217805