



COMMONWEALTH OF PENNSYLVANIA

February 5, 2018

E-FILED

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Petition of PPL Electric Utilities Corporation for Approval of its
Act 129 Phase III EE&C Plan – Docket No. M-2015-2515642**

Dear Secretary Chiavetta:

I am delivering for filing today the Prehearing Memorandum, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Assisting in the development and presentation of the OSBA’s position in this proceeding will be:

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 – Fax
rdk@indecon.com

The OSBA respectfully requests that all parties serve copies of all documents, including discovery, testimony and briefs, upon Mr. Knecht, simultaneously with service upon the OSBA. Thank you.

Copies of the attached will be served on all known parties in this proceeding, as indicated on the enclosed Certificate of Service. If you have any questions, please do not hesitate to contact me.

Sincerely,

Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921

Enclosures

cc: The Honorable Benjamin J. Myers
Parties of Record
Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation :
for Approval of its Act 129 Phase III Energy : Docket No. M-2015-2515642
Efficiency and Conservation Plan :**

**OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission (the “Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§399.41 – 399.50 (“the Act”). In order to discharge this statutory duty, the Office of Small Business Advocate deems it necessary to participate as a party to this proceeding. Please address all correspondence as follows:

Elizabeth Rose Triscari
Deputy Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
etriscari@pa.gov

II. PROCEDURAL BACKGROUND

On June 6, 2017 PPL Electric Utilities Corporation (“PPL” or “Company”) filed a Petition for Approval of Changes to Its Act 129 Phase III Energy Efficiency and Conservation Plan (“Petition”).

Subsequent to review of the Petition, the OSBA engaged in informal discussions with counsel for PPL, which resolved its concerns, and thus OSBA did not submit formal Comments to the Petition.

On July 6, 2017, Comments to the Petition were filed by the Office of Consumer Advocate (“OCA”), the Pennsylvania Energy Efficiency for All Coalition (“PA-EEFA”), the Keystone Energy Efficiency Alliance (“KEEA”), and the PP&L Industrial Customer Alliance (“PPLICA”).

PPL and PPLICA filed reply comments on July 26, 2017.

By Order entered November 21, 2017, the Commission approved all but one of PPL’s proposed changes to its Phase III EE&C Plan, referring to the Office of Administrative Law Judge for hearings and recommended decision the following proposed change:

Proposed Change No. 10 – Allow for Enhanced Incentives for Localized Energy efficiency or Demand Reduction to Be Offered as a Pilot under the Appliance Recycling, Energy Efficient Home, Demand Response and Nonresidential Energy Efficiency Programs.

Administrative Law Judge (“ALJ”) Benjamin J. Meyers was assigned to this proceeding. On December 7, 2017, a Prehearing Conference Notice was issued scheduling a prehearing conference for February 7, 2017. ALJ Meyers issued a

Prehearing Conference Order on December 8, 2017. The OSBA submits this Prehearing Memorandum in accordance with that Order.

III. WITNESS

Assisting in the development and presentation of the OSBA's position in this proceeding will be:

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 – Fax
rdk@indecon.com

The OSBA requests that all parties provide courtesy copies of all documents, including discovery, testimony and briefs, to Mr. Knecht, simultaneously with service upon the OSBA.

IV. IDENTIFICATION OF ISSUES

The issues in this proceeding are limited to the proposed EE&C Plan change referenced above that has been referred by the Commission.

V. DISCOVERY

The OSBA will work with the ALJ and other parties to develop any mutually acceptable discovery modifications.

VI. SERVICE OF DOCUMENTS

The OSBA agrees to accept electronic delivery of documents on the due date as satisfying the in-hand requirement, *provided that such documents are followed by hard copy delivery to OSBA and to its witness identified above by first class mail.* Service by electronic mail *only* is not acceptable.

In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. The OSBA also requests that all parties serve an electronic copy of all interrogatory responses upon the OSBA and the OSBA witness identified above.

VII. SETTLEMENT

Settlement discussions to resolve this matter are already underway.

VIII. PROCEDURAL SCHEDULE

The OSBA will work with the ALJ and other parties to develop a mutually acceptable procedural schedule.

Respectfully submitted,



Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921

For:

John Evans
Small Business Advocate

**Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101**

Dated: February 5, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of its Act 129 :
Phase III Energy Efficiency and : **Docket No. M-2015-2515642**
Conservation Plan :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (unless other noted below) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Benjamin J. Myers
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DATE: February 5, 2018


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