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May 6, 2020

Via Electronic Filing

Rosemary Chiavetta, Esq.
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation for Approval of its Default Service Plan for the Period from June 1, 2021 through May 31, 2025 – Docket No. P-2020-3019356

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Retail Energy Supply Association's ("RESA") Prehearing Memorandum with regard to the above-referenced matter. The undersigned certifies that this filing contains no averments or denials of fact subject to verification and penalties under 52 Pa. Code Section 1.36. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

Kristine E. Marsilio

Kristine E. Marsilio, Esq.

KEM/lww

Enclosure

cc: Hon. Elizabeth Barnes w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of RESA's Prehearing Memorandum upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email only

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Date: May 6, 2019

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of a Default :
Service Program and Procurement : Docket No. P-2020-3019356
Plan for the Period June 1, 2020 :
Through May 31, 2025 :

**PREHEARING MEMORANDUM
OF RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to 52 Pa. Code §§ 5.72-5.75 and the Prehearing Conference Order dated April 8, 2020, the Retail Energy Supply Association (“RESA”)¹ submits this Prehearing Memorandum.

I. BACKGROUND

On March 25, 2020, PPL Electric Utilities Corporation (“PPL” or the “Company”) filed a Petition for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2021 through May 31, 2025 (“DSP Petition”). In its DSP Petition, PPL seeks Pennsylvania Public Utility Commission approval of the terms and conditions under which it will procure default service supplies, provide default service to non-shopping customers, satisfy requirements imposed by the Alternative Energy Portfolio Standards Act (“AEPS Act”),² and recover all associated costs on a full and current basis for the period from June 1, 2021 through May 31, 2025.

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

² 73 P. S. §§ 1648.1 - 1648.8 and related provisions of 66 Pa. C. S §§ 2813-2814.

RESA filed a Petition to Intervene in this proceeding on May 6, 2020. On April 8, 2020, Administrative Law Judge Elizabeth H. Barnes (“ALJ Barnes”) issued a Prehearing Conference Order in the above-captioned proceeding, scheduling a Prehearing Conference in this case for May 15, 2020 and ordering the parties to file Prehearing Memorandums no later than May 12, 2020.

II. ISSUES

RESA is a trade association of power marketers, independent power producers, and a broad range of companies within the Mid-Atlantic marketplace, each of whom support the electric services industry and seek to develop a more competitive power industry. RESA members are licensed to sell electric energy throughout the Commonwealth, including in PPL’s service territory. To date, RESA has identified the following issues that should be examined in this proceeding:

- Whether PPL’s overall default service supply plan is consistent with the Commission’s regulations and the Public Utility Code;
- Whether PPL’s proposed default service plan is effective in promoting retail market development for the benefit of consumers in PPL’s service territory;
- Whether PPL’s proposed modifications to its Standard Offer Program (“SOP”) are reasonable and will serve to promote retail market development. These proposals include: (a) automatically transferring customers to default service upon the expiration of the customer's SOP contract, unless the customer affirmatively elects to remain a shopping customer; and (b) a change in the EGS enrollment term from quarterly to semi-annually.
- Whether PPL’s proposal to eliminate the CAP SOP program is reasonable and in the public interest.
- Whether PPL’s proposed Renewable Rate Program is reasonable and will serve to promote the retail market.

At this time, RESA continues to evaluate PPL’s proposal and will seek to refine its position based on further review of the proposals, discovery, and input from other parties. RESA

reserves the right to raise other issues identified through its continued review and analysis in this case.

III. PROCEDURAL SCHEDULE

RESA will cooperate with the parties and presiding officer to develop a reasonable procedural schedule.

IV. HEARINGS

At this time, RESA continues to evaluate the issues in this proceeding and is unable to evaluate the amount of hearing time (if any) that may be needed.

V. WITNESSES

At this time, RESA is still evaluating whether or not to present testimony in this matter. RESA reserves the right to present a witness, as may be necessary, depending on the course of the proceeding. If RESA decides to present testimony, RESA will provide reasonable notice to Judge Barnes and the parties. RESA also reserves its right to add additional witnesses or change the identity of its witnesses at any time, upon appropriate notice to ALJ Barnes and the parties.

VI. POSSIBILITY OF SETTLEMENT

RESA is willing to participate in settlement discussions with the parties to narrow the issues in this matter.

VII. SERVICE OF DOCUMENTS

PWSA's attorneys in this matter are:

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PWSA prefers that documents be served electronically to the above email addresses and agrees to receive service of documents electronically in this proceeding. To the extent that materials are not available electronically, PWSA requests that only one hard copy of documents, if any, be served upon Deanne O'Dell at the above mailing address.

Respectfully submitted,

Kristine E. Marsilio

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Date: May 6, 2020

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