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May 8, 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 Inspire Energy Holdings, LLC's ("Inspire") 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,

/s/ Lauren M. Burge

Lauren M. Burge, Esq.

LMB/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 Inspire Energy Holdings, LLC 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 8, 2019

Lauren M. Burge

Lauren M. Burge, Esq.

**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, 2021 :
Through May 31, 2025 :

**PREHEARING MEMORANDUM
OF INSPIRE ENERGY HOLDINGS, LLC**

Pursuant to 52 Pa. Code §§ 5.72-5.75 and the Prehearing Conference Order dated April 8, 2020, Inspire Energy Holdings, LLC (“Inspire”) 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”),¹ and recover all associated costs on a full and current basis for the period from June 1, 2021 through May 31, 2025.

Inspire filed a Petition to Intervene in this proceeding on May 8, 2020. On April 8, 2020, Administrative Law Judge Elizabeth H. Barnes (“ALJ Barnes”) issued a Prehearing Conference

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

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

Inspire is an electric generation supplier focused on providing renewable electric energy supply. Inspire is licensed to sell electric energy supply throughout the Commonwealth, including in PPL's service territory. To date, Inspire 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 proposal to eliminate the CAP Standard Offer Program ("SOP") program and require customers participating in its OnTrack program to be on default service is reasonable and in the public interest; and
- Whether PPL's proposed modifications to its SOP are reasonable and will serve to promote retail market development.

At this time, Inspire 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.

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

III. PROCEDURAL SCHEDULE

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

IV. HEARINGS

At this time, Inspire 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, Inspire is still evaluating whether it will present testimony in this matter. Inspire reserves the right to present a witness, as may be necessary, depending on the course of the proceeding. If Inspire decides to present testimony, it will provide reasonable notice to Judge Barnes and the parties. Inspire 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

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

VII. SERVICE OF DOCUMENTS

Inspire's attorneys in this matter are:

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Inspire 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, Inspire requests that only one hard copy of documents, if any, be served upon Deanne O'Dell at the above mailing address.

Respectfully submitted,

/s/ Lauren M. Burge

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Date: May 8, 2020

Attorneys for Inspire Energy Holdings, LLC