



Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

May 11, 2020

VIA ELECTRONIC FILING

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

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; **PREHEARING CONFERENCE MEMORANDUM OF INTERSTATE GAS SUPPLY, INC., SHIPLEY CHOICE LLC, NRG ENERGY, INC, VISTRA ENERGY CORP., ENGIE RESOURCES LLC., WGL ENERGY SERVICES, INC., AND DIRECT ENERGY SERVICES, LLC**

Dear Secretary Chiavetta:

Enclosed for electronic filing with the Commission is the Prehearing Conference Memorandum of Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy, Inc, Vistra Energy Corp., ENGIE Resources LLC., WGL Energy Services, Inc., and Direct Energy Services, LLC ("EGS Parties") in the above-captioned proceedings. Copies of this Memorandum have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart
Counsel for EGS Parties

TSS/jld

Enclosures

cc: Administrative Law Judge Elizabeth Barnes (via electronic mail)
Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party)

VIA ELECTRONIC MAIL ONLY

Honorable Elizabeth Barnes
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
ebarnes@pa.gov

Michael W. Hassell, Esquire
Lindsay A. Berkstresser, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
mhassell@postschell.com
lberkstresser@postschell.com
Counsel for PPL Electric Utilities Corporation

Kimberly A. Klock, Esquire
Michael J. Shafer, Esquire
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
kklock@pplweb.com
mjshafer@pplweb.com
Counsel for PPL Electric Utilities Corporation

Elizabeth R. Marx, Esquire
John Sweet, Esquire
Ria Pereira, Esquire
Pennsylvania Utility Law Project6
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Counsel for CAUSE-PA

Gina L. Miller
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
PO Box 3265
Harrisburg, PA 17105-3265
ginmiller@pa.gov

Christy M. Appleby
David T. Evrard
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
cappleby@paoca.org
devrard@paoca.org

Steven C. Gray
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

Kenneth L. Mickens, Esquire
316 Yorkshire Drive
Harrisburg, PA 17111
Kmickens11@verizon.net
Counsel for The Sustainable Energy Fund

John F. Lushis, Jr., Esquire
Norris McLaughlin, P.A.
515 W. Hamilton Street, Suite 502
Allentown, PA 18101
jlushis@norris-law.com
Counsel for Calpine Retail Holdings, LLC

Gregory L. Peterson, Esquire
201 West Third Street, Suite 205
Jamestown, NY 14701-4907
gpeterson@phillipslytle.com
*Counsel for StateWise Energy Pennsylvania
LLC and SFE Energy Pennsylvania, Inc.*

Deanne M. O'Dell, Esquire
Kristine E. Marsilio, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
PO Box 1248
Harrisburg, PA 17101
dodell@eckertseamans.com
kmarsilio@eckertseamans.com
Counsel for RESA



DATED: May 11, 2020

Todd S. Stewart

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING CONFERENCE MEMORANDUM
OF INTERSTATE GAS SUPPLY, INC., SHIPLEY CHOICE LLC,
NRG ENERGY, INC, VISTRA ENERGY CORP., ENGIE RESOURCES LLC.,
WGL ENERGY SERVICES, INC., AND DIRECT ENERGY SERVICES, LLC**

TO THE HONORABLE ELIZABETH BARNES

Pursuant to the Prehearing Order dated April 8, 2020 in the above-captioned matter and the Commission’s regulations at 52 Pa. Code §5.221, *et seq.*, Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy, Inc, Vistra Energy Corp., ENGIE Resources LLC., WGL Energy Services, Inc., and Direct Energy Services, LLC (“EGS Parties”) by and through their counsel, Hawke McKeon & Sniscak LLP, hereby submit their Prehearing Conference Memorandum.

I. PROCEDURAL HISTORY

1. On or about March 25, 2020, PPL Electric Utilities Corporation (“PPL”) filed the above-captioned petition with the Pennsylvania Public Utility Commission (“Commission”).

2. On May 1, 2020, the EGS Parties filed a Petition to Intervene in the above-captioned proceeding.

II. EXPECTED ISSUES

3. The EGS Parties presently intend to address the following deficiencies in PPL’s Default service filing:

- a. PPL's proposed modifications to its heretofore successful Standard Offer Program ("SOP");
- b. PPL's proposal to eliminate shopping by customers on Customer Assistance ("CAP");
- c. PPL's proposal to provide a 100% renewable product as a default service "option"; and,
- d. The EGS Parties will address ongoing responsibility for Network Integration Transmission Service ("NITS") charges.

III. PROPOSED WITNESSES

4. The EGS Parties have tentatively identified the following witness for this matter:

Chris Kallaher
Senior Director, Corporate Affairs
Direct Energy Services
162 Cypress Street
Brookline, MA 02445

If, for any reason this designation was to change, the EGS Parties will provide notice to Your Honor and the other parties at the earliest possible time. The EGS Parties reserve the right to offer additional witnesses as necessitated by the issues.

IV. LITIGATION SCHEDULE

5. The EGS Parties are committed to working with the other parties and Your Honor to develop a schedule that meets all the parties' needs.

V. DISCOVERY

6. The EGS Parties have not submitted discovery as of the date of this prehearing memorandum but will endeavor to do so as soon as possible. The EGS Parties will work cooperatively with PPL and all the other parties in order to minimize discovery issues that might require the attention of the Presiding Administrative Law Judge. Moreover, the EGS Parties would

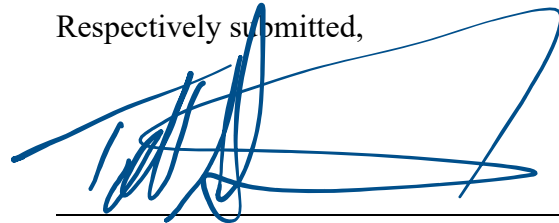
not object to the typical discovery modifications proposed by the Office of Consumer Advocate in cases such as this.

VI. SETTLEMENT

7. The EGS Parties are willing to engage in settlement discussion with any and all parties at any time during this proceeding and welcome the opportunity to do so at the earliest possible date.

WHEREFORE, the EGS Parties respectfully submit this Prehearing Conference Memorandum in anticipation of the Prehearing Conference currently scheduled to be held telephonically on Friday, May 15, 2020 at 10:00 am.

Respectively submitted,



Todd S. Stewart
PA Attorney I.D. # 75556
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
Email: tsstewart@hmslegal.com
Telephone: 717.236.1300
Facsimile: 717.236.4841

Counsel for EGS Parties

DATED: May 12, 2020