



May 11, 2020

Via E-File

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

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

Prehearing Memorandum of CAUSE-PA

Dear Secretary Chiavetta,

Attached for filing, please find the **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** in the above referenced matter.

Copies will be circulated in accordance with the attached Certificate of Service.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA

Elizabeth R. Marx, Esq.
emarxpulp@palegalaid.net

CC: Per Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**Prehearing Memorandum of the Coalition for Affordable Utility Services
and Energy Efficiency in Pennsylvania**

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby submits this Prehearing Memorandum pursuant to the April 8, 2020 Prehearing Conference Order of Administrative Law Judge Elizabeth H. Barnes.

I. History of the Proceeding

On March 25, 2020, PPL Electric Utilities Corporation (“PPL” or “the Company”) filed a Petition for Approval of their Default Service Programs for the period commencing June 1, 2021 through May 31, 2025 (Petition). On April 2, 2020, CAUSE-PA filed a Petition to Intervene.

On April 8, Judge Barnes issued a Prehearing Conference Order requiring parties to serve a Prehearing Conference Memorandum on or before Tuesday, May 12, 2020. On April 18, 2020, notice of PPL’s Petition appeared in the Pennsylvania Bulletin, requiring that answers, protests, and intervention be filed with the Commission and served on Judge Barnes on or before May 8, 2020, and setting a prehearing conference for Friday, May 15, 2020. 50 Pa. B. 2164.

II. Issues to be Addressed

While CAUSE-PA is still reviewing PPL’s Petition, it has tentatively identified the following issues presented by the filing which affect its members:

- a. PPL's Standard Offer Referral Program (PPL Pet. at 27-28);
- b. PPL's proposed protections for customers enrolled in its Customer Assistance Program, known as OnTrack. (PPL Pet. at 30-32);
- c. PPL's Time of Use procurement and rate design proposal (PPL Pet. at 33-34); and
- d. PPL's Renewable Rate Program (PPL Pet. at 35-48).

CAUSE-PA asserts that each of these matters must be thoroughly reviewed through discovery and a hearing to ensure that the Company's low-income customers are not harmed and the programs are in the public interest. CAUSE-PA anticipates that additional issues may arise as a more comprehensive review of the Company's filing is undertaken, discovery is conducted, and other parties present evidence and testimony.

CAUSE-PA reserves the right to present evidence on any issues contained in PPL's filing that were not otherwise specifically identified above, as well as those issues raised by other parties. Any and all evidence presented by CAUSE-PA will be directed so as to ensure that low-income customers are adequately protected in the continued provision of default service.

I. Witnesses

CAUSE-PA intends to present the following witness to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to the Presiding Officer and the parties:

Harry S. Geller, Esquire
118 Locust Street
Harrisburg, PA 17101
717-576-2282
hgellerpulp@palegalaid.net

Mr. Geller will address the issues identified above, as well as other issues that may arise in the course of this proceeding.

II. Discovery

In light of the compressed time-frame for litigation, CAUSE-PA supports a shortened 10-day timeframe for responses to discovery in this proceeding.

III. Settlement

CAUSE-PA is ready and willing to work with the other parties to reach a full or partial settlement of the litigated issues, and encourages parties to engage in settlement discussions early in the proceeding.

IV. Service on CAUSE-PA

Counsel for CAUSE-PA has an e-filing account and accepts electronic service from the Commission. Service on CAUSE-PA by the parties to this proceeding may be made on its attorneys at the Pennsylvania Utility Law Project as follows:

Elizabeth R. Marx, Esq.
Ria Pereira, Esq.
John W. Sweet, Esq.
PENNSYLVANIA UTILITY LAW PROJECT
118 Locust Street
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Tel.: 717-236-9486
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CAUSE-PA will accept e-service of all documents until the Commission's March 20 Emergency Order is lifted. Thereafter, we request that parties serve one hard copy in addition to e-service.

V. Litigation Schedule

CAUSE-PA is actively working with the parties in an attempt to reach a mutually agreeable litigation schedule in this proceeding. CAUSE-PA respectfully requests approval for our witness to appear telephonically for hearings in this proceeding.

VI. Public Input Hearings

CAUSE-PA supports public input hearings in this proceeding. The issues in this proceeding are of grave import to the affordability and accessibility of electric service in PPL's service territory, and should be open to public comment to help inform the Commission's decision in this proceeding.

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference Memorandum, and requests that it be entered into the record of this proceeding.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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May 11, 2020

CERTIFICATE OF SERVICE

I hereby certify I have on this day served copies of the **Prehearing Conference Memorandum of CAUSE-PA** in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) and consistent with the Commission’s March 20, 2020 Emergency Order.

VIA EMAIL ONLY	
Honorable Elizabeth Barnes Administrative Law Judge Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 nd Floor Harrisburg, PA 17120 ebarnes@pa.gov	Kimberly A. Klock, Esq. Michael J. Shafer, Esq. PPL Services Corporation Two North Ninth Street Allentown, PA 18101 kklock@pplweb.com mjshafer@pplweb.com
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DATE: May 11, 2020