

May 12, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

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

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Prehearing Memorandum of the Industrial Energy Consumers of Pennsylvania ("IECPA"), in the above-referenced matter.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact me if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 

Derrick Price Williamson
Barry A. Naum

BAN/sds
Enclosures

c: Administrative Law Judge Elizabeth Barnes (via E-mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

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

VIA E-MAIL

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Barry A. Naum

Dated: May 12, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of Its Default Service Plan for : Docket No. P-2020-3019356
the Period June 1, 2021 through May 31, :
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**PREHEARING MEMORANDUM OF
THE INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA**

Pursuant to the Prehearing Conference Order issued on April 8, 2020, by Administrative Law Judge ("ALJ") Elizabeth H. Barnes, the Industrial Energy Consumers of Pennsylvania ("IECPA"), hereby submits this Prehearing Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

On March 25, 2020, PPL Electric Utilities Corporation ("PPL" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Petition for approval of its fifth Default Service Program and Procurement Plan ("DSP V") for the period from June 1, 2021 through May 31, 2025. On April 8, 2020, ALJ Barnes issued a Prehearing Order establishing a Prehearing Conference to be held on May 15, 2020. On May 6, 2020, IECPA filed a Petition to Intervene to participate in this proceeding. A description of IECPA is set forth in its Petition to Intervene.

II. REPRESENTATION AND SERVICE CONTACT

IECPA is represented by counsel with contact information as follows:

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III. ANTICIPATED ISSUES

IECPA is still evaluating the PPL's DSP V and anticipates being informed by the record created in this case. At this preliminary stage, however, IECPA plans to address PPL's allocation of both capacity and transmission costs among all of its customers, through calculations of Peak Load Contributions ("PLCs") and Network Service Peak Loads ("NSPLs"), respectively, on the basis of 5 Coincident Peaks ("CP"). Particularly as it relates to the allocation of transmission costs, IECPA is concerned that PPL's methodology does not align the retail costs it recovers from its customers with the wholesale costs that PPL incurs for transmission on the PJM system and results in unjust and unreasonable rates for customers. IECPA anticipates pursuing this issue during this proceeding and reserves the right to raise further issues and to respond to all matters raised by other parties.

IV. PROPOSED WITNESSES AND EVIDENCE

IECPA is still in the process of evaluating whether it will sponsor testimony in this proceeding. Regardless, IECPA reserves the right to participate in this proceeding and adduce evidence through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

V. PROPOSED SCHEDULE AND DISCOVERY RULES

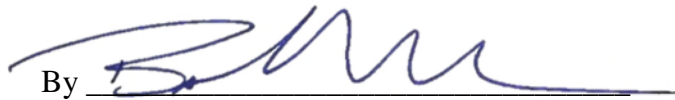
IECPA will cooperate with the ALJ and the parties to formulate a reasonable procedural schedule and discovery rules in accordance with the Commission's regulations and ALJ directives.

To that end, IECPA believes that the parties have already conferred on a schedule that is agreeable to all parties, including IECPA.

VI. SETTLEMENT

IECPA is willing to participate in settlement discussions so as to narrow or resolve issues in dispute among the parties.

Respectfully submitted,

By 

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Dated: May 12, 2020