



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166  
Tel: 717.232.8000 • Fax: 717.237.5300

Adeolu A. Bakare  
Direct Dial: 717.237.5290  
Direct Fax: 717.260.1744  
abakare@mcneeslaw.com

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 a Default Service Program and Procurement Plan for the Period June 1, 2021 through May 31, 2025  
Docket No. P-2020-3019356**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Memorandum of the PP&L Industrial Customer Alliance ("PPLICA"), in the above-referenced proceeding.

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this pleading upon request.

Sincerely,

McNEES WALLACE & NURICK LLC

By 

Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

c: Administrative Law Judge Elizabeth H. Barnes (via E-mail and First-Class Mail)  
Certificate of Service

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## **CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

### **VIA E-MAIL**

Michael W. Hassell, Esq.  
Lindsay A. Berkstresser, Esq.  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[mhassell@postschell.com](mailto:mhassell@postschell.com)  
[lberkstresser@postschell.com](mailto:lberkstresser@postschell.com)

Kimberly A. Klock, Esq.  
Michael J. Shafer, Esq.  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
[kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

Gina L. Miller, Esq.  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)

Steven C. Gray, Esq.  
Office of Small Business Advocate  
300 N. Second Street, Suite 202  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

Todd S. Stewart, Esq.  
Hawke McKeon and Sniscak, LLP  
100 N. Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Elizabeth R. Marx, Esq.  
John Sweet, Esq.  
Ria Pereira, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[emarxpulp@palegalaid.net](mailto:emarxpulp@palegalaid.net)  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

Christy Appleby, Esq.  
David Evrard, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor Forum Place  
Harrisburg, PA 17101-1923  
[CAappleby@paoca.org](mailto:CAappleby@paoca.org)  
[DEvrard@paoca.org](mailto:DEvrard@paoca.org)

Kenneth L. Mickens, Esq.  
SUSTAINABLE ENERGY FUND  
316 Yorkshire Drive  
Harrisburg, PA 17111-6933  
[kmickens11@verizon.net](mailto:kmickens11@verizon.net)

Charles E. Thomas III, Esq.  
Thomas Niesen & Thomas LLC  
212 Locust Street, Suite 302  
Harrisburg, PA 17101  
[cet3@tntlawfirm.com](mailto:cet3@tntlawfirm.com)

H. Rachel Smith, Esq.  
Exelon Business Services Corporation  
100 Constellation Way, Suite 500 C  
Baltimore, MD 21202  
[Holly.smith@exeloncorp.com](mailto:Holly.smith@exeloncorp.com)

Deanne M O'Dell, Esq.  
Kristine E. Marsilio, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[kmarsilio@eckertseamans.com](mailto:kmarsilio@eckertseamans.com)

John F. Lushis, Jr., Esq.  
NORRIS McLAUGHLIN, P.A.  
515 West Hamilton Street, Suite 502  
Allentown, PA 18101  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)

Derrick P. Williamson, Esq.  
Barry A. Naum, Esq.  
Spilman Thomas & Battle PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)

Gregory L. Peterson, Esq.  
Kevin C. Blake, Esq.  
Thomas F. Puchner, Esq.  
Phillips Lytle LLP  
201 West Third Street, Suite 205  
Jamestown, NY 14701-4907  
[kblake@phillipslytle.com](mailto:kblake@phillipslytle.com)  
[gpeterson@phillipslytle.com](mailto:gpeterson@phillipslytle.com)  
[tpuchner@phillipslytle.com](mailto:tpuchner@phillipslytle.com)



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Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

Dated this 12<sup>th</sup> day of May, 2020, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PREHEARING MEMORANDUM OF  
THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

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Pursuant to the April 8, 2020, Prehearing Conference Order issued by Administrative Law Judge Elizabeth H. Barnes, the PP&L Industrial Customer Alliance ("PPLICA") 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 its Petition seeking approval of its fifth Default Service Program and Procurement Plan ("DSP V") for the period June 1, 2021, through May 31, 2025. The Company's DSP outlines a number of terms and conditions by which PPL will supply default service to all retail customers within its service territory.

On May 7, 2020, PPLICA filed a Petition to Intervene and Answer in this proceeding. A description of PPLICA is set forth in PPLICA's Petition to Intervene and Answer. PPLICA's Petition to Intervene and Answer is pending and awaits disposition by the ALJ. A Prehearing Conference has been scheduled in this proceeding for May 15, 2020.

## **II. ANTICIPATED ISSUES AND SUB-ISSUES**

PPLICA is concerned with the following issues:

- a) whether PPL's Petition, as filed, fully justifies its requested relief;
- b) whether PPL's usage of a 5 CP methodology for assigning customers' Network Service Peak Load, when PJM assesses PPL's zonal transmission obligation using a 1 CP methodology, conflicts with the Commission's obligation to ensure cost-of-service rates and results in arbitrary transmission obligations for individual PPL customers; and
- c) whether PPL's requested DSP is just, reasonable, and in the public interest.

PPLICA anticipates pursuing these issues during this proceeding and reserves the right to raise further issues, as well as to respond to all issues raised by other parties.

## **III. PROPOSED WITNESSES**

PPLICA is currently evaluating whether it will sponsor testimony in this proceeding. If PPLICA opts to sponsor testimony, it will immediately inform the parties and the ALJ of any intended witnesses and their areas of testimony. PPLICA also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

## **IV. PROPOSED SCHEDULE AND DISCOVERY RULES**


PPLICA has reviewed a draft schedule circulated by the Company and indicated non-opposition. To the extent the draft schedule is modified for any reason, PPLICA expects to further cooperate with other parties to finalize a mutually acceptable schedule for discovery and testimony. To the extent necessary, PPLICA will also cooperate with the ALJ and the parties at the Prehearing Conference to address any requested modifications to the Commission's standard discovery rules in accordance with the Commission's Regulations and any directives issued by the ALJs.

**V. POSSIBILITY OF SETTLEMENT**

PPLICA is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Pamela C. Polacek (Pa. I.D. 78276)  
Adeolu A. Bakare (Pa. I.D. 208541)  
Jo-Anne S. Thompson (Pa. I.D. 325956)  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
Phone: (717) 232-8000  
Fax: (717) 260-1744

Counsel to the PP&L Industrial Customer  
Alliance

Dated: May 12, 2020