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April 24, 2024

VIA ELECTRONIC FILING

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

**RE: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2025 through May 31, 2029
Docket No. P-2024-3047290**

Dear Secretary Chiavetta:

Attached 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 evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a white background.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

Counsel to the PP&L Industrial Customer Alliance

Attachment

c: Administrative Law Judge F. Joseph Brady (via e-mail)
Certificate of Service

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

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Adeolu A. Bakare

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Dated this 24th day of April, 2024, 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, 2025 Through May 31, 2029	:	
	:	
	:	Docket No. P-2024-3047290
	:	
	:	

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

Pursuant to the April 16, 2024, Prehearing Conference Order issued by Administrative Law Judge ("ALJ") F. Joseph Brady, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Prehearing Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

On March 12, 2024, PPL Electric Utilities Corporation ("PPL" or "Company"), filed a Petition seeking approval of its sixth Default Service Program & Procurement Plan ("DSP VI") for the period June 1, 2025, through May 31, 2029 ("Petition"). The Company's Petition outlines a number of terms and conditions by which PPL will supply default service to all retail customers within its service territory.

On March 28, 2024, PPLICA filed a Petition to Intervene in this proceeding. A description of PPLICA is set forth in Paragraph 1 of PPLICA's Petition to Intervene. PPLICA's Petition to Intervene is pending and awaits disposition by the ALJ. A Prehearing Conference has been scheduled in this proceeding for April 26, 2024.

II. ANTICIPATED ISSUES AND SUB-ISSUES

PPL's Petition generally preserves many programs under its current DSP. However, PPLICA is concerned that other intervening parties may propose amendments to the DSP VI that

could negatively impact PPLICA members. PPLICA anticipates pursuing these issues during the course of 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

As of the time of this filing, PPLICA remains engaged in discussions with the other parties regarding a mutually agreed upon procedural schedule. PPLICA will continue working with the other parties in anticipation of finalizing a mutually agreed upon schedule in advance of the Prehearing Conference. 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 ALJ.

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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Dated: April 24, 2024