



COMMONWEALTH OF PENNSYLVANIA

April 25, 2024

E-FILED

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
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:

Enclosed for filing please find the Prehearing Memorandum, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures

cc: Mark Ewen
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING MEMORANDUM
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to these proceedings. Representing the OSBA in the above-referenced matter are Assistant Small Business Advocates Rebecca Lyttle and Sharon E. Webb.

Please address all correspondence in this matter as follows:

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II. FILING BACKGROUND

On March 12, 2024, PPL Electric Utilities Corporation (“PPL”) filed its Petition, and requests that the Commission enter an Order approving its proposed default service procurement plan for the period of June 1, 2025, through May 31, 2029.

The OSBA filed a Complaint on April 19, 2024.

III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mark Ewen
Industrial Economics, Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
mewen@indecon.com

The OSBA will participate in this proceeding to assure that the interests of small business customers are adequately represented and protected.

After an initial review of the materials submitted by PPL, the OSBA has identified the following list of issues that it will evaluate in this proceeding:

1. Whether the proposed methodology and timing of the small commercial and industrial (“Small C&I”) customer procurements is reasonable, particularly considerations of movement to a 12 and 24 month mix of procurements in alternative months.
2. Whether the Company’s proposal for procurement of alternative energy credits (“AECs”), (b) reconciliation of AEC costs and revenues, and (c) allocation of AECs to the various default service rate groups is fair and reasonable.
3. Whether the Company’s proposed changes to the Standard Offer program are reasonable and well-structured.
4. Whether the Company is experiencing higher uncollectible rates for shopping customers

than for default service customers.

5. Whether the Company's design for the time-of-use "default service" rate option is reasonable.

6. Whether the Company's pricing of default supplies for Small C&I customers is fair and reasonable.

7. Whether the Company's 100 kW demand demarcation approach for Small C&I customers is reasonable.

8. Whether the Company's proposal to continue to recover transmission costs related to default service customers in a reconcilable utility charge is appropriate.

IV. SERVICE OF DOCUMENTS

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date¹ as satisfying the in-hand requirement. In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

The OSBA requests that email delivery of documents also be provided to its witnesses identified above.

V. DISCOVERY

The OSBA does not propose any discovery modifications.

VI. SETTLEMENT

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

¹ In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

VII. HEARING AND BRIEFING SCHEDULE

At the time of this writing, the parties are discussing a proposed procedural schedule.

Respectfully submitted,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Dated: April 25, 2024

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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DATE: April 25, 2024

/s/ Rebecca Lyttle

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