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File #: 203590

April 25, 2024

VIA ELECTRONIC FILING

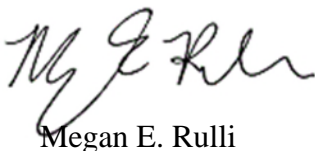
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**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 please find the Prehearing Memorandum on behalf of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/kl
Attachment

cc: The Honorable F. Joseph Brady (*via email--fbrady@pa.gov; w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL

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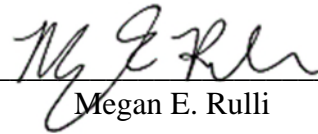
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*Counsel for Intervenor Shell Energy North
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Date: April 25, 2024



Megan E. Rulli

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING MEMORANDUM OF
PPL ELECTRIC UTILITIES CORPORATION**

TO ADMINISTRATIVE LAW JUDGE F. JOSEPH BRADY:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), pursuant to 52 Pa. Code § 5.222(d), and in compliance with the Prehearing Conference Order issued by Administrative Law Judge F. Joseph Brady on April 16, 2024, hereby files this Prehearing Memorandum in the above-captioned matter, and states as follows:

I. PROCEDURAL HISTORY

1. On March 12, 2024, PPL Electric filed a Petition requesting Commission approval of its sixth Default Service Program and Procurement Plan (“DSP VI Program”) to establish the terms and conditions under which PPL Electric will acquire and supply Default Service or provider of last resort service (“Default Service”), from June 1, 2025 through May 31, 2029 (the “DSP VI Program Period”). As explained in the Petition, the DSP VI Program, *inter alia*, consists of a proposal for competitive procurement of Default Service supply and related Alternative Energy Credits (“AECs”) during the DSP VI Program Period; an implementation plan; a proposed rate design, including a Time-of-Use (“TOU”) rate option for Default Service during the DSP VI Program Period; a proposal to modify the Company’s current Standard Offer Referral Program (“SOP”); a change to the date on which the Company files an update to its Transmission Service Charge (“TSC”); a change to the process for customers who are shopping to enroll in the

Company's OnTrack Customer Assistance Program ("CAP"), a proposal to return to wholesale suppliers the obligation to provide a proportionate share of AEC credits under the Full Requirements contracts for all customer classes; and a contingency plan for the DSP VI Program. Copies of a *pro forma* Default Service Request for Proposals Process and Rules ("Default Service RFP"), a *pro forma* Default Service Supplier Master Agreement ("Default Service SMA"), a *pro forma* Long-Term Block Request for Proposals Process and Rules ("Long-Term Block RFP"), a *pro forma* Long-Term Block Supplier Master Agreement ("Block SMA"), a *pro forma* Long-Term PA Solar AEC Request for Proposals Process and Rules ("PA Solar AEC RFP"), a *pro forma* Long-Term PA Solar AEC Supplier Master Agreement ("PA Solar AEC SMA"), a *pro forma* AEC Request for Proposals Process and Rules ("RFP"), a *pro forma* AEC Supplier Master Agreement ("AEC SMA"), a *pro forma* contingency Block Energy Request for Proposals Process and Rules ("contingency Block RFP"), and a *pro forma* contingency Block Energy Supplier Master Agreement ("contingency Block SMA"), were included with the Petition. The filing also contained *pro forma* tariff pages to implement rates under the DSP VI Program.

2. Together with the Petition, PPL Electric filed the direct testimony of four witnesses in support of the DSP VI Program. Therein, PPL Electric more fully explained the details of the proposed DSP VI Program, and why the Company believes that the proposed DSP VI Program includes and/or addresses all of the elements prescribed by Section 2807(e) of the Public Utility Code, the Commission's regulations, and the Commission's policies for a Default Service plan.

3. As of the date of this Prehearing Memorandum, the following persons or entities filed petitions to intervene or notices of appearance, as applicable, in the above captioned proceeding:

- CAUSE-PA – Petition to Intervene filed March 14, 2024

- Office of Consumer Advocate – Answer filed March 20, 2024
- PPL Industrial Customer Alliance – Petition to Intervene filed March 28, 2024
- Calpine Retail Holdings – Petition to Intervene filed April 4, 2024
- NRG Energy Inc. – Petition to Intervene filed April 18, 2024
- Retail Energy Supply Association – Petition to Intervene filed April 18, 2024
- Office of Small Business Advocate – Notice of Intervention filed April 19, 2024
- Shell Energy North America (US), L.P. – Notice of Intervention filed April 19, 2024

II. SERVICE OF DOCUMENTS

4. PPL Electric’s counsel in this proceeding are Michael J. Shafer, Esquire; Kimberly A. Klock, Esquire; David B. MacGregor, Esquire; Michael W. Hassell, Esquire; and Megan E. Rulli, Esquire. PPL Electric requests that all documents be served on:

Michael W. Hassell
 Post & Schell, P.C.
 17 North Second Street
 12th Floor
 Harrisburg, PA 17101-1601
 Phone: 717-612-6029
 Fax: 717-731-1985
 E-mail: mhassell@postschell.com

PPL Electric also requests that Mr. Shafer, Ms. Klock, Mr. MacGregor and Ms. Rulli be added to any e-mail distribution lists in this proceeding. Mr. Shafer’s e-mail address is mjshafer@pplweb.com. Ms. Klock’s e-mail address is kklock@pplweb.com. Ms. Rulli’s email address is mrulli@postschell.com. Mr. MacGregor’s email address is dmacgregor@postschell.com. PPL Electric requests that it be served with an electronic copy of all documents submitted in this proceeding.

5. The lead representative on behalf of PPL Electric for purposes of the prehearing conference will be Mr. Hassell.

III. DISCOVERY

6. The Company has received discovery requests from other parties and is working to provide timely responses.

7. PPL Electric encourages the use of informal discovery processes to expedite discovery.

8. Based upon past experience, PPL Electric believes that a protective order may be appropriate with regard to discovery in this proceeding. PPL Electric will coordinate with the other parties of record to agree upon and submit a motion for a protective order that appropriately limits the disclosure of trade secrets or other confidential information. PPL Electric anticipates that the form of protective order to be used in this proceeding will be substantially similar to the protective order used in PPL Electric's last default service proceeding.

IV. LITIGATION SCHEDULE

9. PPL Electric proposes the following procedural schedule:

Other Parties' Direct Testimony	June 3, 2024
Rebuttal Testimony	July 1, 2024
Surrebuttal Testimony	July 15, 2024, by 12:00 PM
Rejoinder or Rejoinder Outlines	July 17, 2024, by 12:00 PM
Hearings	July 18-19, 2024
Main Briefs Due	August 13, 2024
Reply Briefs Due	August 27, 2024

10. PPL Electric has consulted with the other parties about this proposed schedule. At this time, OCA and CAUSE-PA have indicated their agreeability to the schedule noted above.

11. PPL Electric will also work with the parties to develop a mutually agreeable schedule for the appearance of witnesses at the hearing.

12. PPL Electric proposes that any in-person evidentiary hearing be held in Harrisburg, Pennsylvania.

V. WITNESSES AND ISSUES

13. The names and positions of witnesses that PPL Electric expects to call and the subject matter of their testimony are as follows:

Statement No.	Witness	Topics Addressed
1	Andrew Castanaro Energy Procurement Manager PPL Electric Utilities Corporation 827 Hausman Road Allentown, PA 18104	<ul style="list-style-type: none"> • A description of the background of, and essential elements of, the DSP VI Program; • A description of the <i>pro forma</i> RFP Rules and the <i>pro forma</i> SMAs for both Fixed-Price and Spot Market, Load-Following, Full Requirements, Long-Term Block, Long-Term PA Solar AEC, Alternative Energy Credits, and contingency Block; • A description of the Time of Use Program; • Compliance with the Alternative Energy Portfolio Standards Act; • The selection of the independent third-party manager to administer procurement under the Default Service Program; • Compliance with Regional Transmission Organization requirements; and • Consideration of an EV Default Service rate.
2.	A. Joseph Cavicchi Vice President Analysis Group 111 Huntington Avenue, Boston, MA 02199	<ul style="list-style-type: none"> • Review lessons learned from PPL Electric’s DSP V Program; • Describe the DSP VI product portfolio for each customer group; • Evaluate the proposed DSP VI and explain why the plan is a reasonable approach to procuring default service supply in a manner that is consistent with the requirements of Act 129 and the Commission’s Orders; and • Address why the product portfolio constitutes a “prudent mix” that will ensure “least cost over time” to non-shopping customers while continuing to support the competitive retail market.
3.	Melinda Stumpf Director Customer Programs PPL Electric Utilities Corporation 827 Hausman Rd. Allentown, PA 18104	<ul style="list-style-type: none"> • Provide an overview of the history of the Standard Offer Program (“SOP”); • Present the Company’s proposal to modify the SOP, explain why the SOP should be modified, and provide data supporting the modification of the SOP; • Discuss changes to the SOP, which provide for additional customer protections;

		<ul style="list-style-type: none"> • Present PPL Electric’s proposed change to return customers to default service in order to enroll in OnTrack.
4.	Bethany L. Johnson Senior Director of Regulatory PPL Electric Utilities Corporation 827 Hausman Rd. Allentown, PA 18104	<ul style="list-style-type: none"> • Present PPL Electric’s revisions to the Company’s Transmission Service Charge, Generation Supply Charge-1, and Generation Supply Charge-2 that are being proposed as part of the DSP VI Program.

14. The primary issue in this proceeding is whether the DSP VI Program as proposed by PPL Electric is reasonable and appropriate.

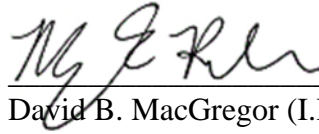
15. PPL Electric’s direct case consists of PPL Electric’s DSP VI Petition and the eleven Attachments thereto: Attachment A – Default Service RFP; Attachment B - Default Service SMA; Attachment C – Long-Term Block RFP; Attachment D –Long-Term Block SMA; Attachment E – Long-Term PA Solar AEC RFP; Attachment F – Long-Term PA Solar AEC SMA; Attachment G – AEC RFP; Attachment H –AEC SMA; Attachment I – contingency Block RFP; Attachment J – contingency Block SMA; and Attachment K - *Pro Forma* Tariff provisions for the GSC-1, the GSC-2, and the TSC. PPL Electric requests that the DSP VI Petition and Attachments thereto be marked for identification and referenced as PPL Electric Exhibit 1.

16. PPL Electric’s direct case also consists of the four statements of direct testimony and related exhibits filed in support of the DSP V Petition: PPL Electric Statement No. 1 - the Direct Testimony of Andrew Castanaro; PPL Electric Statement No. 2 - the Direct Testimony of A. Joseph Cavicchi; PPL Electric Statement No. 3 - the Direct Testimony of Melinda Stumpf; and PPL Electric Statement No. 4 – the Direct Testimony of Bethany L. Johnson.

VI. SETTLEMENT

17. At this time, the parties have not discussed the possibility of settlement. PPL Electric will work with the parties in an attempt to reach a settlement in this proceeding.

Respectfully submitted,



David B. MacGregor (I.D. # 28804)

Michael W. Hassell (I.D. # 34851)

Megan Rulli (I.D. # 331981)

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Dated: April 25, 2024

Attorneys for PPL Electric Utilities Corporation