

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY  
Consumer Advocate

July 7, 2009

James J. McNulty  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

RE: Petition of PPL Electric Utilities  
Corporation for Approval of an Energy  
Efficiency and Conservation Plan  
Docket No. M-2009-2093216

Dear Secretary McNulty:

Enclosed for filing is the Notice of Intervention and Public Statement of the Office of Consumer Advocate, in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in black ink that reads "James A. Mullins".

James A. Mullins  
Assistant Consumer Advocate  
PA Attorney I.D. # 77066

Enclosures

cc: Honorable Susan D. Colwell  
Office of Special Assistants

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation : Docket No. M-2009-2093216  
Energy-efficiency and Conservation Plan :

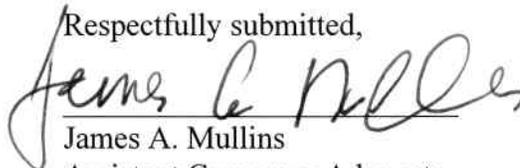
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NOTICE OF INTERVENTION

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Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

James A. Mullins  
Assistant Consumer Advocate  
PA Attorney I.D. # 77066  
E-Mail: JMullins@paoca.org  
Tanya J. McCloskey  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50044  
E-Mail: TMcCloskey@paoca.org  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152

Respectfully submitted,  
  
James A. Mullins  
Assistant Consumer Advocate  
PA Attorney I.D. # 77066

DATED: July 7, 2009  
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PUBLIC STATEMENT OF THE  
OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to intervene and participate in the PPL Electric Utilities Corporation's (PPL or Company) Energy-Efficiency and Conservation Plan (EE&C Plan) filed pursuant to the requirements of Act 129 of 2008 (Act 129) and the Implementation Order entered by the Commission on January 16, 2009 at Docket No. M-2008-2069887.

On July 1, 2009, PPL filed its EE&C Plan with the Commission. The proposed EE&C Plan consists of 14 voluntary programs for customers and describes an extensive portfolio of energy-efficiency, conservation, and peak load reduction measures, programs, and education. These 14 programs are designed to meet the goals established by Sections 2806.1 and 2806.2 of Act 129. The Plan also incorporates elements of PPL's coordination activities with Pennsylvania's other electric distribution companies, including ideas, insights, and consistent program features, design elements, and implementation details. For residential customers, PPL proposes to offer the following programs: 1) Efficient Equipment Incentive Program, 2) Residential Energy Assessment & Weatherization, 3) Compact Fluorescent Lighting Campaign, 4) Appliance Recycling, 5) ENERGYSTAR New Homes, 6) Renewable Energy Program, 7) Direct Load Control, 8) Time of Use Rates, and 9) Energy Efficiency Behavior & Education. Additionally, for low-income customers, PPL will offer Low-Income WRAP and E-Power Wise Program. PPL requests that the Commission approve all of these programs together as an

integrated portfolio designed to meet Act 129 energy-efficiency and conservation goals in the Company's service territory.

The Company also proposes to implement an Act 129 Compliance Rider (ACR) to be applied, on a non-bypassable basis, to charges for electricity supplied to customers who receive distribution service from the Company. The ACR shall be computed separately for Residential, Small Commercial and Industrial, and Large Commercial and Industrial classes. The rider shall be applied to the monthly bill of each customer receiving distribution service from the Company and shall be reconciled on an annual basis for under-collections and over-collections experienced during the previous year.

The Consumer Advocate determined to intervene in this proceeding to protect the interests of PPL's customers; to ensure that the proposed EE&C Plan and the proposed programs are in accordance with Act 129 and all other applicable statutes, regulations and case law; and to ensure that any increase in rates resulting from the adoption of the proposed programs and any related expenses are just and reasonable.

The OCA intends to review several areas of PPL's proposed plan including the design of the proposed programs; the cost effectiveness of the proposed programs and plan; and the Company's proposed cost recovery mechanisms. The OCA will seek to ensure that any costs that are sought to be recovered are consistent with Commission regulations, statutes and applicable case law and result in rates that are just and reasonable.

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities :  
Corporation for Approval of an Energy : Docket No. M-2009-2093216  
Efficiency and Conservation Plan :

I hereby certify that I have this day served a true copy of the foregoing document, Notice of Intervention and Public Statement of the Office of Consumer Advocate, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 7<sup>th</sup> day of July 2009.

SERVICE BY E-MAIL and INTEROFFICE MAIL

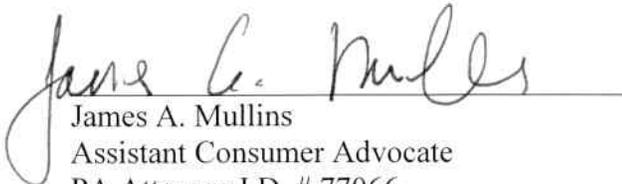
Johnnie E. Simms, Esquire  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

Paul E. Russell, Esquire  
PPL Electric Utilities Corporation  
Two North Ninth Street  
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David B. MacGregor, Esquire  
Andrew S. Tubbs, Esquire  
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17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601

William R. Lloyd  
Small Business Advocate  
Office of Small Business Advocate  
Commerce Building, Suite 1102  
300 North Second Street  
Harrisburg, PA 17101

A handwritten signature in cursive script that reads "James A. Mullins". The signature is written in black ink and is positioned above a horizontal line.

James A. Mullins  
Assistant Consumer Advocate  
PA Attorney I.D. # 77066  
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