

BERGER LAW FIRM, P.C.

ATTORNEY AT LAW

2104 MARKET STREET
CAMP HILL, PA 17011

TELEPHONE: (717) 920-8900
FACSIMILE: (717) 920-8901

EMAIL: publicutilitylaw@bergerlawfirm.net

VIA E-FILE

September 14, 2012

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

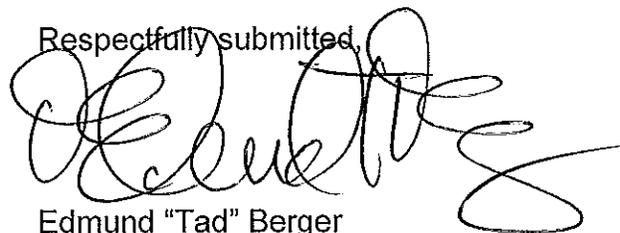
**Re: Pa Public Utility Commission v. PPL Electric Utilities, Inc.
Docket No. R-2012-2290597
Letter in Lieu of Reply Brief on behalf of Richards Energy Group, Inc.**

Dear Secretary Chiavetta:

Please accept this letter in lieu of a Reply Brief in the above-captioned matter, on behalf of Richards Energy Group, Inc..

Consistent with Richards Energy Group's ("REG") Main Brief in this matter, and for the reasons set forth there, REG disagrees with the position asserted by the Office of Consumer Advocate in its Main Brief with respect to cost-of-service and revenue allocation issues and endorses PPL witness Kleha's cost-of-service study and revenue allocation proposals. Further, Richards Energy would emphasize its position that Rate CER should allocate costs to those customers on whose behalf they are incurred, i.e. customers who are not yet shopping.

Respectfully submitted,



Edmund "Tad" Berger

cc: Certificate of Service
Hon. Susan Colwell, ALJ (via e-mail and first class mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility
Commission

v.

PPL Electric Utilities Corporation

:
:
:
:
:
:

Docket No. R-2012-2290597

I hereby certify that I have this day served a true copy of the foregoing document, **Letter in Lieu of Reply Brief of Richards Energy Group, Inc.**, upon the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

ELECTRONIC AND FIRST CLASS MAIL

John H Isom, Esq.
Post & Schell PC
12th Floor
17 North Second Street
Harrisburg PA 17101-1601

Scott J Rubin, Esq.
Law Office Of Scott J Rubin
333 Oak Lane
Bloomsburg PA 17815

Joseph L Vullo, Esq.
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort PA 18704

Todd S Stewart, Esq.
Hawke Mckee & Sniscak LLP
100 North Tenth Street
Harrisburg PA 17101

Regina L Matz, Esq.
PA Public Utility Commission – I&E
Po Box 3265
Harrisburg PA 17105-3265

Kenneth Mickens, Esq.
316 Yorkshire Dr.
Harrisburg, PA 17111

Steven Gray, Esq.
Office Of Small Business Advocate
300 North Second Street
Suite 1102
Harrisburg, PA 17101

Darryl A Lawrence, Esq.
Office Of Consumer Advocate
555 Walnut Street
Fifth Floor Forum Place
Harrisburg PA 17101-1923

Carl Shultz, Esq.
Eckert Seamans Cherin & Mellott Llc
213 Market Street 8th Fl
Harrisburg PA 17101

Deanne M O'Dell, Esq.
Eckert Seamans Cherin & Mellott Llc
213 Market Street 8th Fl
Harrisburg PA 17101

Adeolu A Bakare, Esq.
Mcnees Wallace & Nurick Llc
Po Box 1166
Harrisburg PA 17108

VIA FIRST CLASS MAIL

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg PA 17112

Helen Schwika
1163 Lakeview Drive
White Haven PA 18661

Roberta Kurrell
591 Little Mountain Rd
Sunbury PA 17801-5540

Dave Kenney
577 Shane Drive
Effort PA 18330

William Andrews
40 Gordon Avenue
Carbondale PA 18407

September 14, 2012

A handwritten signature in black ink, appearing to read "Edmund Berger", written over a horizontal line. The signature is highly stylized and cursive.

Edmund "Tad" Berger

Berger Law Firm, P.C.
2104 Market Street
Camp Hill, PA 17011
Phone: (717) 920-8900
Fax: (717) 920-8901
E-Mail: publicutilitylaw@bergerlawfirm.net