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September 14, 2012

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

RE: PPL Electric Utilities Corporation – Supplement No. 118 to Tariff –
Electric Pa. PUC No. 201
Docket No. R-2012-2290597

Dear Secretary Chiavetta:

Enclosed please find the original and nine copies of the Reply Brief of the Commission on Economic Opportunity for filing with the PUC. I have served all parties of record in accordance with the enclosed Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Respectfully yours,



Joseph L. Vullo

JLV/jar
encls.

cc: All Parties of Record
ALJ Susan D. Colwell

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PPL ELECTRIC UTILITIES CORPORATION
SUPPLEMENT NO. 118 TO TARIFF – ELECTRIC
Pa.P.U.C. NO. 201

DOCKET NUMBER: R-2012-2290597

REPLY BRIEF OF INTERVENOR
COMMISSION ON ECONOMIC OPPORTUNITY

AREAS ADDRESSED:
Universal Service Programs

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ARGUMENT

The purpose of this Reply Brief is to respond to a single contention made by the Company in its Initial Brief-that the level of LIURP funding should not be addressed in this rate case but instead is better left for consideration in the Company's next Universal Service Plan (USP) filing that will be filed on June 1, 2013

Initially, the Company's argument ignores the timing of the two proceedings. If its request for a rate increase is granted the rate increase will take effect on January 1, 2013 and low-income customers will begin to feel the effects on that increase at that time. The Company's next USP filing is not due to be filed until June 1, 2013 and will address the years 2014-2016. The effect of postponing the issue of LIURP funding until the year 2014 means that low-income customers will feel the effects of this rate increase for a full year before relief in the form of increased LIURP funding would be available to them. CEO was granted intervener status to address the Company's universal service programs in this case and has been granted intervener status for the same reason in numerous prior cases, including prior rate cases filed by this Company. This is the first time that this Company, or any of the other EDCs that have filed rate cases, has raised the argument that funding for universal service programs should be left for consideration in the triennial USP filings.

Further, other parties in this proceedings have raised issues concerning the Company's universal service programs but the Company has not raised the similar argument that those universal service program issues should be addressed in the next USP filing. Similarly, although the Bureau of

Investigation and Enforcement opposes CEO's request to increase LIURP funding it does not do so based upon the argument that the issue should be addressed in the USP filing.

In short, without citing any authority, the Company selectively argues that CEO's request to increase LIURP funding, and only CEO's request, should be left to the next USP filing. And as indicated in CEO's initial brief the Company's argument is in contrast to the manner in which this Company, and this Commission, has treated such requests in the past. This Company has addressed universal service issues in past rate proceedings on the merits. To postpone consideration of universal service funding to a time after a rate increase takes effect, and to a non-adversarial proceeding, deprives low-income customers of timely relief from a rate increase.

Respectfully submitted,

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 118 to Tariff - Electric : Docket No. R-2012-2290597
Pa.P.U.C. No. 201 :

CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Reply Brief of Intervenor Commission on Economic Opportunity upon the following participants this 14th day of September, 2012, via email and first-class mail:

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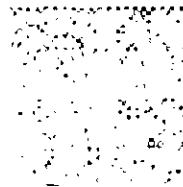


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