

**Before the
Pennsylvania Public Utility Commission**

Pennsylvania Public Utility Commission:

v. PPL Electric Utilities Corporation : Docket No. R-2015-2469275
Supplement No. 179 to Tariff - :
Electric Pa. P.U.C. No. 201 :

April 30, 2015

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

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission are the original and three (3) copies of Eric Joseph Epstein's Petition to Intervene in the above-referenced proceeding. Pursuant to Section 701 of the Pennsylvania Public Utility Commission of the Code 66 Pa. C.S.A. § 701; Sections 5.21 & 5.22, Eric Joseph Epstein, *Pro se* hereby files a Formal Petition to Intervene in the above cited case.

Sincerely, *Pro se*

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

cc: Certificate of Service

e) Eric Joseph Epstein participated in PPL Electric Utilities Corporation 2006 Competitive Transition Charge Reconciliation Filings.

f) Mr. Epstein was an Active Party in PPL Electric Utilities 2007 application with the Pennsylvania Public Utility Commission for an annual increase for distribution rates.

g) Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of A Rate Stabilization Plan, and was an active participant in PPL's Collaborative.

h) Eric Joseph Epstein also intervened and was an Active Party in PPL Electric Utilities Request for Approval to Offer Customers a Voluntary Alternative Energy Program and to Bank Alternative Energy Credits;

i) Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of an Energy Efficiency and Conservation Plan.

j) Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of Time of Use Supplement No. 71 Tariff Electric PA PUC. No 201 Issued on July 31, 2009, Effective for Service On and After January 1, 2010.

j) Mr. Epstein is an active participant in PPL's Collaborative stake holder process, a proponent of TOU tariffs, and offered TOU programming suggestions during the TOU collaborative in 2007-2008 and in Direct Testimony submitted to the PUC on October 30, 2009.

k) Mr. Epstein intervened in PPL Electric Utilities Corporation's Petition for Approval of Time of Use Supplement No. 94 to Tariff Electric PA PUC, No. 201, Docket No. R-2010 with an issue date of September 23, 2010 and an Effective date of January 1, 2011.

l) Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of a Default Service Program and Procurement Plan for the Period January 1, 2011 through May 14, 2014.

m) Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation Request or Approval of Time of Use Supplement No. 1102 to Tariff Electric PA PUC, No 201, Docket No. R-2011-2264771 from 2011-2012.

n) Mr. Epstein intervened in Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation, Docket No. R-2012-229057, Supplement No. 118 to Tariff Electric Pa. P.U.C. No. 201 in 2012 .

4) PPL increased distribution rates by 6% percent in 2005.

5) The Company increased distribution rates by 2.7% in 2008.

6) PPL's proposed a rate increase request of \$114.7 million or 2.4% increase in PPL's total retail revenue in 2010

7) On December 5, 2012, the Public Utility Commission adopted an Order authorizing a \$71.065 million rate increase for PPL Electric Utilities effective on January 1, 2012. The Order was entered on December 28, 2012 and became effective on January 1, 2013.

8)The increase drove up the flat monthly customer charge 62% from \$8.75 to \$14.09 per month. The PUC allowed PPL a nominal decrease in the distribution charge levied on a per kilowatt basis, from 2.55 cents to 2.51 cents. The \$71 million annual increase that took effect January 1, 2013 increased the bill of a residential customer by 3%.

9) PPL filed a letter with the Commission on February 27, 2015 stating it will be filing for a rate increase. PPL is requesting”

- An overall 18.5% increase on distribution rates
- The residential rate increase is steep. Distribution charges would increase from \$14.09 to \$20.00 per month (but on daily rate) and variable charge to increase from \$0.02511 to \$0.03209 /kWh.
- For a 1000 kWh residential customer, distribution rates would increase from \$39.20 to \$52.90 (132%).

- PPL is also submitting a request to increase its DSIC cap from 5% to 7.5%.

10) The Company's Testimony and documentation to support their rate requests are insufficient to establish that the proposed rates are just, reasonable and nondiscriminatory, as required by Sections 1301 & 1304 of the Code, 66 Pa. C.S.A. § 1301 & 1304.

11) The Respondent has the full burden of proof [Section 315 (a) of the Public Utility Code Code, 66 Pa. C.S.A. § 315 (a)] to establish and prove that the proposed rate increases are just and reasonable and consistent with Section 1301 of the Code, 66 Pa. C.S.A. § 1301.

12) Eric Joseph Epstein's Petition is universal and inclusive, and directed against the rates, terms, and provisions contained in the proposed \$167.5 million annual rate increase.

13) Mr. Epstein respectfully requests that the Pennsylvania Public Utility Commission provide the following relief:

i) Conduct an investigation into the rates, terms, and provisions contained in PPL's proposed \$167.5 million annual increase in Company rates in full evidentiary hearings;

ii) Suspend the effectiveness date of PPL's proposed rate increase;

iii) Grant Eric Joseph Epstein's Petition to Intervene; and,

iv) Allow Mr. Epstein to fully participate in the evidentiary proceeding, cross examine PPL witnesses as well as witnesses presented by Active Parties; present his own evidence; prepare direct, rebuttal and sur-rebuttal testimony; and, offer arguments on his own behalf.

Respectfully submitted,

Eric Joseph Epstein, *Pro se*
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Harrisburg, PA 17112
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Dated: April 30, 2015

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the active participants named below by US mail or hand delivery or electronic transmission in accordance with the requirements of Section 1.54.

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Respectfully submitted,

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Dated: April 30, 2015