

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY
Consumer Advocate

January 5, 2009

Michael W. Hassell, Esquire
Matthew J. Agen, Esquire
Post & Schell, P.C.
12th Floor
17 North Second Street
Harrisburg, PA 17101-1601

RE: Petition of PPL Electric Utilities
Corporation for Approval of a Default Service
Program and Procurement Plan for the Period
January 1, 2001 through May 31, 2014
Docket No. P-2008-2060309

Dear Mr. Hassell:

Enclosed please find the Office of Consumer Advocate's Responses to PPL Electric Utilities Corporation's Interrogatories and Requests for Production of Documents, Set I, with accompanying witness verification, in the above-referenced proceeding. Due to the voluminous nature of the attachments, the OCA is only providing these requested materials by disk to the Company. Should a party wish to receive the attachments by disk, please notify our office.

Also enclosed is a copy of the Certificate of Service for these responses, which has been filed with Secretary McNulty of the Pennsylvania Public Utility Commission.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Erin L. Gannon".

Erin L. Gannon
Assistant Consumer Advocate
PA Attorney I.D. # 83487

Enclosures


cc: James J. McNulty, Secretary – Original Certificate of Service
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation :
for Approval of a Default Service Program : Docket No. P-2008-2060309
and Procurement Plan for the Period :
January 1, 2001 through May 31, 2014 :

VERIFICATION

I Richard Hahn, hereby state that I am the witness responsible for responding to the Interrogatories and Request for Production of Documents from PPL Electric Utilities Corporation, Set I and that the facts above set forth are true and correct to the best of my knowledge, information and belief in the listed interrogatory responses. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature: 
Richard Hahn

Consultant Address: LaCapra Associates
One Washington Mall
9th Floor
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DATED: January 5, 2009

Email: rhahn@lacapra.com
Phone: 617-778-2467

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities Corporation :
for Approval of a Default Service Program : Docket No. P-2008-2060309
and Procurement Plan for the Period :
January 1, 2001 through May 31, 2014 :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Responses to PPL Electric Utilities Corporation's Interrogatories and Requests for Production of Documents, Set I, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 5th day of January 2009.

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