

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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consumer@paoca.org

IRWINA. POPOWSKY
Consumer Advocate

February 13, 2009

Paul E. Russell
Associate General Counsel
PPL Services Corporation
Office of General Counsel
Two North Ninth Street
Allentown, PA 18106

RE: Application of PPL Electric Utilities Corporation
Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for
Approval of the Siting and Construction of the Pennsylvania
Portion of the Proposed Susquehanna-Roseland 500 kV
Transmission Line in Portions of Lackawanna, Luzerne,
Monroe, Pike and Wayne Counties, Pennsylvania
Docket No. A-2009-2082652

Petition of PPL Electric Utilities Corporation for a Finding
that a Building to Shelter Equipment at the 500-230 kV
Substation to be Constructed in the Borough of Blakely,
Lackawanna County, Pennsylvania is Reasonably Necessary
for the Convenience or Welfare of the Public
Docket No. A-2009-2082832

Application of PPL Electric Utilities Corporation Under
15 Pa. C.S. §§1511(c) for a Finding and Determination that
the Service to be Furnished by the Applicant Through Its
Proposed Exercise of the Power of Eminent Domain to
Acquire a Right-Of-Way and Easement Over and Across the
Lands of the Property Owners Listed Below For the Proposed
Susquehanna-Roseland 500 kV Transmission Line In Portions
of Lackawanna, Luzerne, Monroe, Pike and Wayne Counties,
Pennsylvania is Necessary or Proper for the Service,
Accommodation, Convenience or Safety of the Public

Chaudari Family Limited Partnership, A-2009-2088297
David Murphy, and Marguerite T. Kranick
HaRa Corporation A-2009-2088337
Max Bohleman A-2009-2088331
Richard Coccodrilli, Jr., Jeffrey J. A-2009-2088327
Coccodrilli, Jr, Ryan T. Coccodrilli, and Joseph Williams

February 13, 2009

D&L Realty Company	A-2009-2088340
Randal W. Rowe, Sandy K. Rowe, and Germaine Michele Cole	A-2009-2088357
Kenneth Powell and Linda Powell	A-2009-2088359
Frank C. Bonacci and Marie E. Bonacci	A-2009-2088315
Rudolph Saporito and Maria Saporito	A-2009-2088312
David Murphy	A-2009-2088360
Anthony R. Domiano, Sr. and Anthony R. Domiano, Jr.	A-2009-2088307
Stafursky Properties, Ltd	A-2009-2088310
Charles Coccodrilli	A-2009-2088353

Dear Mr. Russell:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set I, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within twenty (20) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Peter J. Lanzalotta
Lanzalotta & Associates LLC
14250 Royal Harbour Court, #914
Fort Myers, FL 33908
Telephone: 239-433-1428
E-mail: petelanz@lanzalotta.com

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary McNulty of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Respectfully Submitted,



Darryl Lawrence
Assistant Consumer Advocate
PA Attorney I.D. # 93682

Enclosures

cc: James J. McNulty – Cover Letter and Certificate

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David Murphy	:	A-2009-2088360
Anthony R. Domiano, Sr. and Anthony R.	:	A-2009-2088307
Domiano, Jr.	:	
Stafursky Properties, Ltd	:	A-2009-2088310
Charles Coccodrilli	:	A-2009-2088353

INTERROGATORIES OF THE
OFFICE OF CONSUMER ADVOCATE
SET I

Pursuant to 52 Pa. Code Section 5.341, the Office of Consumer Advocate hereby propounds the following Interrogatories to PPL Electric Utilities Corporation to be answered by those officers, employees, agents, or contractors who have knowledge of the requested facts and who are authorized to answer on behalf of the Company. Each interrogatory is to be verified by the responding witness in accordance with 52 Pa. Code Section 5.342(a)(6).

DATED: February 13, 2009

Instructions

- 1) These interrogatories shall be construed as a continuing request. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as first becomes available to the Respondent after the answers hereto are filed.
- 2) Restate the interrogatory immediately preceding each response.
- 3) Identify the name, title, and business address of each person(s) providing each response.
- 4) Provide the date on which the response was created.
- 5) Divulge all information that is within the knowledge, possession, control, or custody of Respondent or may be reasonably ascertained thereby. The term "PPL" or "the Company," or "you," as used herein includes PPL Electric Utilities Corporation, its attorneys, agents, employees, contractors, or other representatives.
- 6) Provide a verification by the responsible witness that all facts contained in the response are true and correct to the best of the witnesses knowledge, information and belief.
- 7) As used herein the word "document" or "workpaper" includes, but is not limited to, the original and all copies in whatever form, stored or contained in or on whatever media or medium including computerized memory, magnetic, electronic, or optical media, regardless of origin and whether or not including additional writing thereon or attached thereto, and may consist of:
 - a) notations of any sort concerning conversations, telephone calls, meetings or other communications;
 - b) bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys;
 - c) worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing.

CERTIFICATE OF SERVICE

Application of PPL Electric Utilities Corporation	:	Docket No.	A-2009-2082652
Filed Pursuant to 52 Pa. Code Chapter 57,	:		
Subchapter G, for Approval of the Siting and	:		
Construction of the Pennsylvania Portion of the	:		
Proposed Susquehanna-Roseland 500 kV	:		
Transmission Line in Portions of Lackawanna,	:		
Luzerne, Monroe, Pike and Wayne Counties,	:		
Pennsylvania	:		
Petition of PPL Electric Utilities Corporation for	:		A-2009-2082832
a Finding that a Building to Shelter Equipment at	:		
the 500-230 kV Substation to be Constructed in	:		
the Borough of Blakely, Lackawanna County,	:		
Pennsylvania is Reasonably Necessary for the	:		
Convenience or Welfare of the Public	:		
Application of PPL Electric Utilities Corporation	:		
Under 15 Pa. C.S. §§1511(c) for a Finding and	:		
Determination that the Service to be Furnished	:		
by the Applicant Through Its Proposed Exercise	:		
of the Power of Eminent Domain to Acquire a	:		
Right-Of-Way and Easement Over and Across	:		
the Lands of the Property Owners Listed Below	:		
For the Proposed Susquehanna-Roseland 500 kV	:		
Transmission Line In Portions of Lackawanna,	:		
Luzerne, Monroe, Pike and Wayne Counties,	:		
Pennsylvania is Necessary or Proper for the	:		
Service, Accommodation, Convenience or Safety	:		
of the Public	:		
Chaudari Family Limited Partnership, David	:		A-2009-2088297
Murphy, and Marguerite T. Kranick	:		
HaRa Corporation	:		A-2009-2088337
Max Bohleman	:		A-2009-2088331
Richard Coccodrilli, Jr., Jeffrey J. Coccodrilli,	:		A-2009-2088327
Jr, Ryan T. Coccodrilli, and Joseph Williams	:		
D&L Realty Company	:		A-2009-2088340
Randal W. Rowe, Sandy K. Rowe, and	:		A-2009-2088357
Germaine Michele Cole	:		
Kenneth Powell and Linda Powell	:		A-2009-2088359
Frank C. Bonacci and Marie E. Bonacci	:		A-2009-2088315
Rudolph Saporito and Maria Saporito	:		A-2009-2088312
David Murphy	:		A-2009-2088360

Anthony R. Domiano, Sr. and Anthony R.	:	A-2009-2088307
Domiano, Jr.	:	
Stafursky Properties, Ltd	:	A-2009-2088310
Charles Coccodrilli	:	A-2009-2088353

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Interrogatories Set I, 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 13th day of February 2009.

Service By E-Mail and Interoffice Mail

Charles Daniel Shields, 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
Associate General Counsel
PPL Services Corporation
Office of General Counsel
Two North Ninth Street
Allentown, PA 18106
Counsel for: *PPL Electric Utilities Corporation*

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Post & Schell, P.C.
Four Penn Center
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Counsel for: *PPL Electric Utilities Corporation*

John H. Isom, Esquire
Andrew S. Tubbs, Esquire
Post & Schell, P.C.
12th Floor
17 North Second Street
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Counsel for: *PPL Electric Utilities Corporation*

William R. Lloyd
Small Business Advocate
Office of Small Business Advocate
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300 North Second Street
Harrisburg, PA 17101
Counsel for: *Office of Small Business Advocate*

Joseph and Maria Doe
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E-mail: dtkocher@verizon.net

Paul M. Schmidt, Esquire
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1515 Market Street
Philadelphia, PA 19102-1981
Counsel for: *Saw Creek Estates Community
Association, Inc.*

Arlean R. Lilly
1260 Smith Gap Road
Bath, PA 18014-8737
E-mail: arlean@ptd.net

Service by First Class Mail

Max Bohleman
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Archbald, PA 18403

Annette & Ralph Seeley
52 Saw Creek Est.
Bushkill Pa 18324

Max Bohleman
SR 247 Road
Archbald, PA 18403

Chaudhari Family Limited Partnership
1311 Delaware Street
Dunmore, PA 18512

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279 Faller Road
Lake Ariel, PA 18436

D & L Realty
400 Mill Street
Dunmore, PA 18512

Randal W. Rose, Sandy K. Rowe and
Germaine Michele Cole
2213 Owego Turnpike
Honesdale, PA 18431

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Ryan T. Coccodrilli, and Joseph Williams
Four East Forest Drive
Saylorsburg, PA 18353

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1221 Cortez Road
Lake Ariel, PA 18436-4548

Frank C. Bonacci and Marie E. Bonacci
193 Laurel Street
Archbald, PA 18403

David Murphy
279 Faller Road
Lake Ariel, PA 18436

Hawley Water Company
255 Belmont Street
Waymart, PA 18472

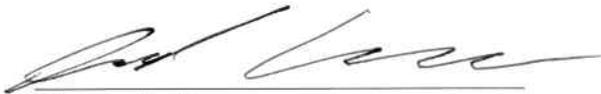
Stafursky Properties, LTD
502 Main Street
Archbald, PA 18403

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Clarks Summit, PA 18411

Anthony R. Domiano, Sr. and
Anthony R. Domiano, Jr
1 Domiano Drive
Eynon, PA 18403

Rudolph and Maria Saporito
P.O. Box 434
Lake Ariel, PA 18436-0434

HaRa Corporation
c/o F. Andrew Wolf, Corporate Counsel
Bushkill Group
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Bushkill, PA 18324



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