

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY
Consumer Advocate

FAX (717) 783-7152
consumer@paoca.org

March 23, 2009

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

RE: Applications 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 Nos. A-2009-2082652, *et al.*

Dear Mr. Russell:

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

In accordance with the Fourth Prehearing Order entered on March 10, 2009, we request that the Company provide verified answers to these inquiries within fifteen (15) 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:

Robert Fagan
Synapse Energy Economics, Inc.
22 Pearl Street
Cambridge, MA 02139
Telephone: 617-661-3248
E-mail: rfagan@synapse-energy.com

Paul E. Russell, Associate General Counsel

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March 23, 2009

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,

A handwritten signature in black ink, appearing to read 'Darryl Lawrence', written in a cursive style.

Darryl Lawrence

Assistant Consumer Advocate

PA Attorney I.D. # 93682

Enclosures

cc: James J. McNulty – Cover Letter and Certificate

109392

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Applications 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	:	Docket Nos. A-2009-2082652, <i>et al.</i>
Portion of the Proposed Susquehanna-Roseland	:	
500 kV Transmission Line in Portions of	:	
Lackawanna, Luzerne, Monroe, Pike and Wayne	:	
Counties, Pennsylvania	:	

INTERROGATORIES OF THE
OFFICE OF CONSUMER ADVOCATE
SET IV

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: March 23, 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

Applications 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 : Docket Nos. A-2009-2082652, *et al.*
Portion of the Proposed Susquehanna-Roseland :
500 kV Transmission Line in Portions of :
Lackawanna, Luzerne, Monroe, Pike and Wayne :
Counties, Pennsylvania :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate Interrogatories Set IV to PPL Electric Utilities Corporation, 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 23rd day of March 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

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Marianna, PA 15345
Counsel for: *Energy Conservation Council*

Service by First Class Mail

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Lake Ariel, PA 18436

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HaRa Corporation
c/o F. Andrew Wolf, Corporate Counsel
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