

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Harrisburg, Pennsylvania 17101-1923  
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IRWINA. POPOWSKY  
Consumer Advocate

March 25, 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, *et al.*

Dear Mr. Russell:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set V, 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:

Peter J. Lanzalotta  
Lanzalotta & Associates LLC  
67 Royal Pointe Drive  
Moss Creek Plantation  
Hilton Head Island, SC 29926  
Telephone: 843-836-3278  
E-mail: [petelanz@lanzalotta.com](mailto:petelanz@lanzalotta.com)

Paul Russell, Associate General Counsel

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

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INTERROGATORIES OF THE  
OFFICE OF CONSUMER ADVOCATE  
SET V

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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 25, 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 V 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 25<sup>th</sup> 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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PPL Services Corporation  
Office of General Counsel  
Two North Ninth Street  
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Philadelphia, PA 19103-2808  
Counsel for: *PPL Electric Utilities Corporation*

John H. Isom, Esquire  
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Christopher Wright, Esquire  
Post & Schell, P.C.  
12<sup>th</sup> Floor  
17 North Second Street  
Harrisburg, PA 17101-1601  
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Joseph and Maria Doe  
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East Meadow, NY 11554  
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Paul M. Schmidt, Esquire  
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Kent D. Murphy  
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UGI Corporation  
460 North Gulph Road  
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Counsel for: *UGI Utilities, Inc.*

Joseph Dominguez  
Sr. Vice President for Government Affairs  
and General Counsel  
Exelon Generation  
300 Exelon Way  
Kennett Square, PA 19348  
Counsel for: *Exelon Generation*

William R. Lloyd  
Small Business Advocate  
Office of Small Business Advocate  
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Counsel for: *Office of Small Business Advocate*

Timothy & Debra Kocher  
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Counsel for: *Pennsylvania-American Water*

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Attorney at Law  
1000 S. State Street  
Clarks Summit, PA 18411  
Counsel for: *D. Scott and Patrice Amity Haan*

Edmund "Tad" Berger  
Berger Law Firm, P.C.  
2104 Market Street  
Camp Hill, PA 17011  
Counsel for: *Energy Conservation Council*

Joseph Dominguez, General Counsel  
Denise Foster, Director, Policy Development  
Exelon Generation  
300 Exelon Way  
Kennett Square, PA 19348  
Counsel for: *Exelon Corporation*

Pamela C. Polacek, Esquire  
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McNees Wallace & Nurick, LLC  
100 Pine Street  
Harrisburg, PA 17108  
Counsel for: *PP&L Industrial Customer Alliance*

Willard Burns, Esquire  
Burns Law Firm LLC  
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Counsel for: *Energy Conservation Council*

Service by First Class Mail

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Lake Ariel, PA 18436

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

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Bushkill, PA 18324

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Bushkill, PA 18324

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

Chaudhari Family Limited Partnership  
1311 Delaware Street  
Dunmore, PA 18512

D & L Realty  
400 Mill Street  
Dunmore, PA 18512

Richard Coccodrilli, Jr., Jeffrey J. Coccodrilli,  
Ryan T. Coccodrilli, and Joseph Williams  
Four East Forest Drive  
Saylorsburg, PA 18353

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Rudolph and Maria Saporito  
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Lake Ariel, PA 18436-0434

Donna Davis, Esquire  
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Dunmore, PA 18512

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