

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560 (in PA only)

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

IRWINA. POPOWSKY  
Consumer Advocate

April 8, 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 VI, 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

Page 2

April 8, 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

*00109140.docx*

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 :

---

INTERROGATORIES OF THE  
OFFICE OF CONSUMER ADVOCATE  
SET VI

---

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: April 8, 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 VI 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 8<sup>th</sup> day of April 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*

David B. MacGregor, Esquire  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Counsel for: *PPL Electric Utilities Corporation*

John H. Isom, Esquire  
Andrew S. Tubbs, Esquire  
Christopher Wright, Esquire  
Post & Schell, P.C.  
12<sup>th</sup> Floor

17 North Second Street  
Harrisburg, PA 17101-1601  
Counsel for: *PPL Electric Utilities Corporation*

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  
Shelby A. Linton-Keddie, Esquire  
McNees Wallace & Nurick, LLC  
100 Pine Street  
Harrisburg, PA 17108  
Counsel for: *PP&L Industrial Customer Alliance*

Kent D. Murphy  
Senior Counsel  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406  
Counsel for: *UGI Utilities, Inc.*

Willard Burns, Esquire  
Burns Law Firm LLC  
390 Oak Spring Road  
Marianna, PA 15345  
Counsel for: *Energy Conservation Council*

Susan Simms Marsh  
Corporate Counsel  
Pennsylvania American Water  
800 West Hershey Park Drive  
Hershey, PA 17033  
Counsel for: *Pennsylvania-American Water*

Paul M. Schmidt, Esquire  
Zarwin Baum DeVito Kaplan Schaer Toddy  
12<sup>th</sup> Floor  
1515 Market Street  
Philadelphia, PA 19102-1981  
Counsel for: *Saw Creek Estates Community Association, Inc.*

Service by First Class Mail

David Murphy and  
Marguerite T. Kranick  
279 Faller Road  
Lake Ariel, PA 18436  
Docket No: *A-2008-2088297*

David Murphy  
279 Faller Road  
Lake Ariel, PA 18436  
Docket No: *A-2008-2088360*

Chaudhari Family Limited Partnership  
1311 Delaware Street  
Dunmore, PA 18512  
Docket No: *A-2008-2088297*

D & L Realty  
400 Mill Street  
Dunmore, PA 18512  
Docket No: *A-2008-2088340*

HaRa Corporation  
c/o F. Andrew Wolf, Corporate Counsel  
Rout 209, P.O. Box 447  
Bushkill, PA 18324  
Docket No: *A-2008-2088337*

Rudolph and Maria Saporito  
P.O. Box 434  
Lake Ariel, PA 18436-0434  
Docket No: *A-2008-2088312*

Robert F. Bernathy, Esquire  
Klemeyer, Farley, & Bernathy, LLC  
Suite 6  
2523 Route 6  
Hawley, PA 18428  
Counsel for: *Township of Lehman*

Geff Blake, Esquire  
Wright & Reihner, P.C.  
148 Adams Avenue  
Scranton, PA 18503  
Counsel for: *Chaudari Family Limited  
Partnership, Marguerite T. Kranick and David  
Murphy*

Etianna M. Hyman  
576 Saw Creek Estates  
Bushkill, PA 18324

Donna Davis, Esquire  
P.O. Box 423  
Dunmore, PA 18512

Diane Berger and Larry Berger  
205 Princeton Place  
Williamstown, NJ 08094

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

Richard Coccodrilli, Jr., Jeffrey J. Coccodrilli,  
Ryan T. Coccodrilli, and Joseph Williams  
Four East Forest Drive  
Saylorsburg, PA 18353  
Docket No: *A-2008-2088327*

Kenneth & Linda Powell  
1305 Justus Boulevard  
Clarks Summit, PA 18411  
Docket No: *A-2008-2088359*

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

Cheryl Hamilton, MD  
576 Saw Creek Estates  
Bushkill, PA 18324

Joseph and Maria Doe  
2117 5<sup>th</sup> Street  
East Meadow, NY 11554

Timothy & Debra Kocher  
1184 Ridge Road  
Bath, PA 18014

Bernard McGurl  
Executive Director  
Lackawanna River Corridor Association  
P.O. Box 368  
Scranton, PA 18501

Arlean R. Lilly  
1260 Smith Gap Road  
Bath, PA 18014-8737

Beverly & Arthur Karten  
155 At the Falls  
Bushkill, PA 18324

Sheryl A. Rosen  
668 Saw Creek Estates  
Bushkill, PA 18324

Alix M. Mariette  
63 Wickes Road  
Bushkill, PA 18324



Dianne E. Dusman  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 38308  
E-Mail: DDusman@paoca.org  
Darryl Lawrence  
PA Attorney I.D. # 93682  
E-Mail: DLawrence@paoca.org  
Shaun A. Sparks  
PA Attorney I.D. # 87372  
E-Mail: SSparks@paoca.org  
Assistant Consumer Advocates

Counsel for  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
00107990.docx