

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

IRWINA. POPOWSKY
Consumer Advocate

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

May 5, 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 VII, 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

Paul Russell, Associate General Counsel

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May 5, 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,



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 :

INTERROGATORIES OF THE
OFFICE OF CONSUMER ADVOCATE
SET VII

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: May 5, 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 Motion of the Office of Consumer Advocate for a Protective Order and to Compel Answers to Discovery, 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 22nd 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
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PPL Services Corporation
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Counsel for: *PPL Electric Utilities Corporation*

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Counsel for: *PPL Electric Utilities Corporation*

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

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

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

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

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

Paul M. Schmidt, Esquire
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Counsel for: *Saw Creek Estates Community Association, Inc.*

Pamela C. Polacek, Esquire
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Counsel for: *PP&L Industrial Customer Alliance*

Michael F. Faherty, Esquire
Lavery Faherty Young & Patterson
Suite 304
225 Market Street
Harrisburg, PA 17108-1245
Counsel for: *Richard Coccodrilli, Jr.*

Service by First Class Mail

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

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

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

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*

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

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

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

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*

Joseph and Maria Doe
2117 5th Street
East Meadow, NY 11554

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

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Bath, PA 18014

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

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52 Saw Creek Est.
Bushkill Pa 18324

Al Spinelli
249 At The Falls
Bushkill, PA 18324

Stanley & Susan Tomkiel
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Robyn Long
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