

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)

IRWINA. POPOWSKY
Consumer Advocate

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

September 30, 2009

James J. McNulty
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Petition of PPL Electric Utilities
Corporation Requesting Approval of a Voluntary
Purchase of Accounts Receivables Program and
Merchant Function Charge
Docket No. P-2009-2129502

Dear Secretary McNulty:

Enclosed for filing is the Notice of Intervention and Public Statement of the Office of Consumer Advocate, in the above-referenced proceeding.

Copies have been served as indicated on the Certificate of Service.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Tanya J. McCloskey".

Tanya J. McCloskey
Senior Assistant Consumer Advocate
PA Attorney I.D. # 50044

Enclosures

cc: Office of Administrative Law Judge
Office of Special Assistants

00118077.docx

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation :
Requesting Approval of a Voluntary : Docket No. P-2009-2129502
Purchase of Accounts Receivables Program :
and Merchant Function Charge :

NOTICE OF INTERVENTION

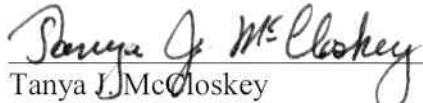
Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Candis A. Tunilo
Assistant Consumer Advocate
PA Attorney I.D. # 89891
E-Mail: CTunilo@paoca.org

Tanya J. McCloskey
Senior Assistant Consumer Advocate
PA Attorney I.D. # 50044
E-Mail: TMcCloskey@paoca.org

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

Respectfully Submitted,


Tanya J. McCloskey
Senior Assistant Consumer Advocate
PA Attorney I.D. # 50044

DATED: September 30, 2009
00118081.docx

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Office of Consumer Advocate (OCA) has determined to file an Answer and Notice of Intervention and participate in proceedings before the Commission involving the Petition of PPL Electric Utilities Corporation (PPL or Company) for Approval of a Voluntary Purchase of Accounts Receivables Program and Merchant Function Charge.

On September 10, 2009, PPL filed with the Commission its Petition for Approval of Voluntary Purchase of Accounts Receivables Program (POR) and Merchant Function Charge (MFC). In its Petition, PPL seeks Commission approval to implement a POR program and a merchant function charge to unbundle generation related uncollectible accounts expense for base rates. PPL filed this Petition in compliance with the Commission's Order in PPL Electric Utilities Corporation Retail Markets, Docket No. M-2009-2104271. The Retail Markets Order had directed PPL to file tariff supplements to implement the provisions of the Order, including the development of a Purchase of Receivables Program. Under this program, PPL proposes to purchase the accounts receivable of electric generation suppliers that use PPL's consolidated billing as the means of charging their customers for the EGS service. PPL has requested the right to terminate customers if they fail to pay the EGS charges in full.

The OCA has determined to participate in this proceeding to protect the interests of ratepayers. While the OCA does not oppose POR programs *per se*, it is the OCA's position that POR programs must contain key consumer protection provisions. The OCA will seek to ensure that

these key consumer protections are implemented with PPL's POR program should the Commission order the Company to implement a POR Program. The OCA will also seek to ensure that any rates or charges imposed on PPL customers as a result of this program are just and reasonable.

00118081.docx

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities Corporation :
Requesting Approval of a Voluntary : Docket No. P-2009-2129502
Purchase of Accounts Receivables Program :
and Merchant Function Charge :

I hereby certify that I have this day served a true copy of the foregoing document, the Notice of Intervention and Public Statement of the Office of Consumer Advocate, 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 30th day of September 30, 2009.

SERVICE BY E-MAIL and INTEROFFICE MAIL

Johnnie E. Simms, 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
Two North Ninth Street
Allentown, PA 18101
Counsel for: *PPL Electric Utilities Corporation*

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

Anthony D. Kanagy, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Counsel for: *PPL Electric Utilities Corporation*

Todd S. Stewart, Esquire
Hawke McKeon & Sniscak, LLP
P. O. Box 1778
100 North Tenth Street
Harrisburg, PA, 17105
Counsel for: *Dominion Retail, Inc*

Michael Meath
Strategic Communications, LLC
3532 James Street
Suite 106
Syracuse, NY 13206
Counsel for: *Agway Energy Services. LLC*

Craig C. Goodman, Esquire
National Energy Marketers Association
3333 K Street NW
Suite 110
Washington, DC 20007
Counsel for: *National Energy Marketers Association*

J. Michael Love, Esquire
Energy Association of Pennsylvania
800 North Third Street
Suite 301
Harrisburg, PA 17102-2025
Counsel for: *Energy Association of Pennsylvania*

Linda R. Evers, Esquire
FirstEnergy Services
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
Counsel for: *Met-Ed, Penelec, Penn Power*

Steven C. Gray
Assistant Small Business Advocate
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101
Counsel for: *Office of Small Business Advocate*

Pamela C. Polacek, Esquire
Shelby Linton-Keddie, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P. O. Box 1166
Harrisburg, PA 17108-1166
Counsel for : *PP&L Industrial Customer Alliance*

John L. Munsch, Esquire
Allegheny Energy
800 Cabin Hill Drive
Greensburg, PA 15601-1689
Counsel for: *Allegheny Power*

Gary A. Jack, Esquire
Duquesne Light Company
16th Floor
411 Seventh Avenue
Pittsburgh, PA 15219
Counsel for: *Duquesne Light Company*

Deanne O'Dell, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17108-0865
Counsel for: *Retail Energy Supply Association and Direct Energy Services*

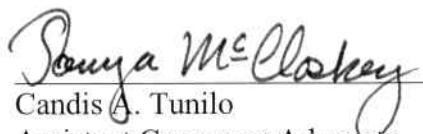
Melanie J. Tambolas, Esquire
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, Pa 19103-6998
Counsel for: *Constellation Energy Commodities Group*

Divesh Gupta
Constellation NewEnergy
111 Market Place
Suite 500
Baltimore, MD 21202

Counsel for: *Constellation Energy
Commodities Group and Constellation
NewEnergy*

David Fein
Constellation NewEnergy Group
55 West Washington Boulevard
Suite 300
Chicago, IL 60661

Counsel for: *Constellation Energy
Commodities Group and Constellation
NewEnergy*



Candis A. Tunilo

Assistant Consumer Advocate

PA Attorney I.D. # 89891

E-Mail: CTunilo@paoca.org

Tanya J. McCloskey

Senior Assistant Consumer Advocate

PA Attorney I.D. # 50044

E-Mail: TMcCloskey@paoca.org

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

00118078.docx