

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY
Consumer Advocate

December 7, 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 for Approval of a Default Service
Program and Procurement Plan for the Period
January 1, 2011 through May 31, 2013
Docket No. P-2008-2060309

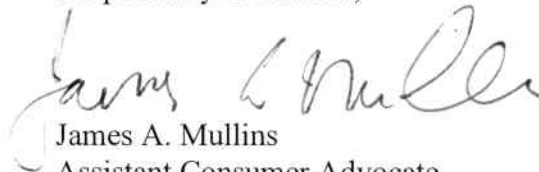
Dear Secretary McNulty:

The OCA is in receipt of the Petition of PPL Electric Utilities Corporation (PPL or Company) filed on November 16, 2009 in the above-reference proceeding. In its Petition, the Company requests that the Pennsylvania Public Utility Commission (PUC or Commission) approve a single modification to the Request for Proposals (RFP) Process and Rules for Alternative Energy Credits (AECs) to increase the number of eligible competitive bidders for the procurement of AECs pursuant to the March 11, 2009 Joint Petition for Settlement approved by the Commission. Specifically, the Company requests that it be allowed to remove from the AEC RFP the requirement that an applicant demonstrate that its, or its guarantor's, unsecured senior long-term debt rating (or issuer rating, if the unsecured senior long-term debt rating is unavailable) is currently available from Standard & Poor's, Fitch Ratings, or Moody's Investor Services.

James J. McNulty, Secretary
December 7, 2009
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The OCA does not object to this modification of the Joint Petition for Settlement (Settlement) for this procurement. By this letter, the OCA does not take a position on any similar requests for modification to the Settlement for subsequent RFPs.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "James A. Mullins". The signature is written in a cursive style with a large initial "J".

James A. Mullins
Assistant Consumer Advocate
PA Attorney I.D. # 7706600120455

cc: Honorable Susan D. Colwell
Certificate of Service

00120455.docx

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities Corporation :
for Approval of a Default Service Program : Docket No. P-2008-2060309
and Procurement Plan for the Period :
January 1, 2011 through May 31, 2013 :

I hereby certify that I have this day served a true copy of the foregoing document, letter of the Office of Consumer Advocate, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 7th day of December 2009.

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