



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Fax  
www.postschell.com

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Christopher T. Wright

cwright@postschell.com  
717-612-6013 Direct  
717-731-1985 Fax  
File #: 2507/140056

April 7, 2010

James J. McNulty  
Secretary  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
PO Box 3265  
Harrisburg, PA 17105-3265

**RE: Petition of PPL Electric Utilities Corporation for a Declaratory Order Regarding a Pilot to Expand Website and Interactive Voice Response Capability to Allow Customers the Option of Setting Up Payment Agreements or, in the Alternative, a Two-Year Waiver of 52 Pa. Code § 56.97(a)  
Docket No. P-2010-**

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Dear Secretary McNulty:

Enclosed for filing please find the above-referenced Petition of PPL Electric Utilities Corporation for a Declaratory Order. Copies will be provided as indicated on the certificate of service.

Respectfully Submitted,

Christopher T. Wright

CTW/skr  
Enclosure  
cc: Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

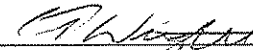
**VIA FIRST CLASS MAIL**

Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923

Office of Trial Staff  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

Office of Small Business Advocate  
Commerce Building  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101

Date: April 7, 2010



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Christopher T. Wright

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :  
Corporation for a Declaratory Order :  
Regarding a Pilot to Expand Website and :  
Interactive Voice Response Capabilities to : Docket No. P-2010-\_\_\_\_\_  
Allow Customers the Option of Setting Up :  
Payments Agreements or, in the Alternative, :  
a Two-Year Waiver of 52 Pa. Code § :  
56.97(a).

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**PETITION OF PPL ELECTRIC UTILITIES CORPORATION**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”) hereby petitions the Pennsylvania Public Utility Commission (“Commission”), pursuant to 66 Pa.C.S. § 331(f) and 52 Pa. Code § 5.42, and respectfully requests a declaratory order to remove uncertainty regarding the application of 52 Pa. Code § 56.97(a) to PPL Electric’s proposed pilot to expand its Website and Interactive Voice Response (“IVR”) capabilities to allow customers the option, in defined circumstances, to establish payment agreements either online or through an automated system to avoid termination. In the alternative, PPL Electric respectfully requests, pursuant to 52 Pa. Code §§ 5.42 and 56.222, a two-year waiver of 52 Pa. Code § 56.97(a) for PPL Electric’s proposed pilot to expand its Website and IVR capabilities to provide customers with the option to establish payment agreements. In support thereof, PPL Electric states as follows:

**I. INTRODUCTION**

1. This Petition is filed by PPL Electric, a public utility that provides electric distribution and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

2. PPL Electric's address is Two North Ninth Street, Allentown, Pennsylvania 18101.

3. PPL Electric's attorneys are:

David B. MacGregor (I.D. #28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Voice: 215.587.1197  
Fax: 215.320.4879  
E-mail: dmacgregor@postschell.com

Paul E. Russell (I.D. #21643)  
Associate General Counsel  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
Voice: 610.774.4254  
Fax: 610.774.6726  
E-mail: perussell@pplweb.com

Michael W. Hassell (I.D. #34851)  
Christopher T. Wright (I.D. # 203412)  
Post & Schell, P.C.  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101-1601  
Voice: 717.612.6032  
Fax: 717.731.1985  
E-mail: mhassell@postschell.com  
E-mail: cwright@postschell.com

PPL Electric's attorneys are authorized to receive all notices and communications regarding this Petition.

4. PPL Electric, like other regulated utilities in Pennsylvania, has provided customers with a variety of payment options, including making payments through online or

automated systems, such as its Website and IVR systems. As more fully explained below, PPL Electric is proposing a pilot to expand its Website and IVR capabilities to allow customers, within certain limitations, to use those options to set up payment agreements to avoid termination. PPL Electric believes that its pilot to expand the Website and IVR systems is reasonable, effective, and in the public interest.

5. Section 56.97(a) of the Commission's Regulations provides as follows:

(a) If, after the issuance of the initial termination notice and prior to the actual termination of service, a ratepayer or occupant contacts the utility concerning a proposed termination, an authorized utility employee shall fully explain:

- (1) The reasons for the proposed termination.
- (2) All available methods for avoiding a termination, including the following:
  - (i) Tendering payment in full or otherwise eliminating the grounds for termination.
  - (ii) Entering a settlement or payment agreement.
- (3) The medical emergency procedures.

52 Pa. Code § 56.97(a).

6. For the reasons that follow, PPL Electric believes that its pilot to expand its Website and IVR capabilities for establishing payment agreements complies with Section 56.97, and requests a declaratory order from the Commission to that effect. Alternatively, PPL Electric respectfully requests that the Commission issue an order granting a two-year waiver of Section 56.97(a) so that customers can use those options to set up payment agreements, as described herein.

## II. APPLICABLE LAW AND REGULATIONS

### A. **Declaratory Order.**

7. Section 331(f) of the Code, 66 Pa.C.S. § 331(f), and the Commission's regulations at 52 Pa. Code § 5.42 provide that the Commission may issue a declaratory order to terminate an actual controversy or to remove uncertainty.

8. Declaratory judgment is a means to declare rights, status, and other legal relations. *See* 42 Pa.C.S. §§ 7532, 7533. Declaratory judgment "is to be liberally applied to afford relief from uncertainty and insecurity." *Township of Derry v. Pa. Dep't of Labor & Industry*, 593 Pa. 480, 485, 932 A.2d 56, 59 (2007) (citing 42 Pa. C.S. § 7541(a)). In order to establish a claim for declaratory relief, a petitioner "must allege an interest by the party seeking relief which is direct, substantial and present ... and must demonstrate the existence of an actual controversy related to the invasion or threatened invasion of one's legal rights." *Council 13, AFSCME v. Cmwlth.*, 954 A.2d 706, 716 (Pa. Cmwlth. 2008)(quotation omitted). Stated otherwise, "declaratory judgment must not be employed to determine rights in anticipation of events which may never occur or for consideration of moot cases or as a medium for the rendition of an advisory opinion which may prove to be purely academic." *Id.* (quoting *Gulnac v. South Butler County School District*, 526 Pa. 483, 488, 587 A.2d 699, 701 (1991)).

9. For reasons that follow, there is uncertainty regarding whether the requirement that "an authorized utility employe" explain certain information concerning a proposed termination would permit a customer to voluntarily establish a payment arrangement either online or through an automated system, under the circumstances described below. PPL Electric has a substantial interest in the resolution of this question prior to implementing its proposed pilot to expand its Website and IVR capabilities, in order to avoid the potential for subsequent complaints alleging a failure to comply with Chapter 56 of the Commission's Regulations.

**B. Waiver of Regulations.**

10. Alternatively, if the Commission concludes that PPL Electric's proposal to allow customers, in defined circumstances, to use those options to set up payment agreements to avoid termination is not permitted under Section 56.97, PPL Electric respectfully requests the Commission grant a two-year waiver for PPL Electric's pilot.

11. Section 5.43 of the Commission's Regulations permits a party to petition the Commission for a waiver of a regulation. The petition must provide the purpose and facts that constitute the grounds requiring waiver of the regulation. 52 Pa. Code § 5.43(a). Similarly, Section 56.222 of the Commission's Regulations permits a party to seek a modification or temporary exemption from a provision of Chapter 56 of the Commission's regulations. 52 Pa. Code § 56.222.

12. The Commission has explained that it has the authority to waive its regulations when it is necessary and in the public interest. *Petition of Direct Energy Services, LLC for Emergency Order Approving a Retail Aggregation Bidding Program for Customers of Pike County Light & Power Company*, Docket No. P-00062205, 2006 Pa. PUC LEXIS 3, 249 P.U.R.4th 327 (April 20, 2006); *Petition of ALLTEL Pennsylvania, Inc. for Declaratory Order*, Docket Nos. P-00950955, *et al.* (June 10, 1996).

13. For the reasons explained below, PPL Electric believes that its pilot program will provide helpful and timely options for customers to respond to termination notices, while continuing to provide the ability to speak directly to a Customer Service Representative. A two-year waiver of any prohibition will permit PPL Electric to test the effectiveness of its pilot.

### III. DISCUSSION

#### A. **Background and Overview of PPL Electric’s Pilot to Expanded the Website and IVR Systems.**

14. To accommodate customers’ needs to communicate with PPL Electric in a timely manner, PPL Electric offers a variety of communication avenues, such as telephone, e-mail, fax, Website, IVR, and written correspondence.

15. Historically, the telephone was the primary means through which customers contacted PPL Electric to address their inquiries and concerns. However, with the advent of the Internet, the communications profile for PPL Electric’s customers has dramatically changed. For example, in 2009 PPL Electric’s Customer Contact Center processed 4.2 million customer contacts through its telephone, Website, and IVR systems.<sup>1</sup> Of this total, 49.3% (2.1 million) were Website (1,330,030) and IVR (764,591) transactions. The following table below illustrates that these “self-service” transactions for PPL Electric have more than doubled since 2006.

<b>Year</b>	<b>Web Transactions</b>	<b>IVR Transactions</b>	<b>Total Web and IVR Transactions</b>
2009	1,330,030	764,591	2,094,621
2008	1,203,092	790,346	1,993,438
2007	711,632	810,922	1,522,554
2006	197,805	739,062	936,867

This upward trend is continuing in 2010. When comparing self-service transactions for January and February of 2009 and 2010, Website and IVR transactions in 2010 have increased by 18.9% and 16.3%, respectively.

16. Customers are using PPL Electric’s existing Website and IVR systems for a variety of transactions, including making payments. In 2009, customers made approximately 1.3

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<sup>1</sup> This total includes inbound calls handled, Website transactions completed, and successful IVR contacts.

million payments via the Website (1,059,855) and IVR (248,089) systems. Stated differently, the Company received an average of approximately 109,000 payments monthly through its Website and IVR systems. Because most customers make only one payment monthly, nearly 9% of PPL Electric's customers are using these tools to make payments. These trends are continuing in 2010. Indeed, from January 1, 2010 through February 28, 2010, customers have made approximately 197,068 Website payments and approximately 44,440 IVR payments.

17. PPL Electric proposes to implement a pilot to expand its existing Website and IVR systems to permit customers to establish payment agreements to avoid a potential termination. Under the proposed pilot, after receiving an initial termination notice customers will have the option, within certain limitations discussed below, to set up payment agreements to avoid termination by accessing the Website or IVR systems at the customer's convenience.

18. Customers are informed about the reasons for termination through receipt of the 10-day termination notice. Under the proposed pilot to expand the Website and IVR systems, customers will be automatically advised of all available methods for avoiding termination through links on the Website system and automated prompts on the IVR system. Further, PPL Electric has designed the expanded systems to provide either written (Website) or automated (IVR) reminders that customers may speak directly with a Customer Service Representative.

19. Under the proposed pilot to expand the Website and IVR systems, the initial welcome screen (Website) or prompt (IVR) will provide information such as the balance, past due amount, and scheduled termination of service date. The next screen or prompt (Payment Assistance Options) will then provide several payment options, such as paying the reinstatement amount, reporting a payment, or establishing a payment agreement. There will also be

instructions on how to proceed with a payment agreement and details regarding the terms of the agreement and universal service programs, such as LIHEAP and CAP, if eligible.

20. Payment agreements established through the Website or IVR will use the same criteria followed by PPL Electric's Customer Service Representatives, as set forth in 52 Pa. Code § 1405(b). For example, a customer with household income under 150 percent of the federal poverty level will have five years to pay off an overdue balance. The system will request or update financial information to determine the agreement terms. Customers will be offered budget billing and, if appropriate based on their household income, referrals to universal service programs such as LIHEAP and CAP. PPL Electric will send confirmations to customers after they have completed the transaction.

21. PPL Electric will not require customers to complete payment agreement transactions that they do not understand. Once a customer starts to use the pilot Website or IVR systems to establish a payment agreement, customers may cancel out at any time if they do not understand the terms or do not have time to complete the transaction. If customers cancel out, the pilot systems provide a reminder that the termination will continue as scheduled, and that customers should call PPL Electric to discuss their concerns. The pilot systems also provide PPL Electric's toll-free telephone number and Call Center hours of operation. Further, if customers received a termination notice from PPL Electric, the notice also includes toll-free telephone numbers for both the Commission and PPL Electric.

22. After customers select the payment agreement option, the system will present those customers with the terms of their payment agreements. The system will ask customers if they are in agreement with the terms. If customers answer "no," the Website will present a message that requests that customers call PPL Electric to discuss other options. The IVR will

forward customers to a Customer Service Representative immediately if customers answer “no” to the proposed payment agreement terms.

23. Importantly, if customers were to use PPL Electric’s pilot Website or IVR systems to establish payment agreements, they would always have the opportunity to speak directly with a Customer Service Representative between the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday. This process is identical for customers who receive a bill and choose to call PPL Electric directly.

24. For those customers who decide to use the pilot Website or IVR to establish a payment agreement, PPL Electric will automatically send those customers a follow-up e-mail for Website transactions or letter for IVR transactions. The purpose of these follow-up communications is to recap and confirm the completed transaction and explain the steps customers should take in the event they disagree with or do not understand the payment agreement. These e-mail or letter communications include PPL Electric’s toll-free telephone number and Call Center hours of operation.

25. In the 10-day termination notice, customers are advised about emergency provisions for medical certifications. Customers will also be provided with information about medical certifications under the proposed pilot. The Website and IVR systems will provide medical certification information and ask if a medical condition exists in the home. If customers answer “yes,” the systems will automatically place a three-day hold on any collection activity. A second message will provide an explanation of how customers can proceed with having a doctor or nurse practitioner contact PPL Electric to report a medical condition. However, these customers would continue to have the opportunity to establish or reinstate a payment agreement through the pilot Website and IVR systems.

26. PPL Electric recognizes the importance of personal communications as customers move closer to their scheduled termination dates. As a result, the pilot systems are designed with an additional consumer safeguard. Specifically, the pilot systems will not allow customers to use the Website or IVR to establish payment agreements if customers are within three days of their scheduled termination dates. These customers must call PPL Electric to discuss their overdue bills and to establish payment agreements with a Customer Service Representative. However, these customers would continue to have payment options available to them via the Website or IVR, including payment of the overdue amount to reinstate a defaulted payment agreement or to report a payment.

27. Under the proposed pilot to expand the Website and IVR capabilities, residential customers will have additional protection against shut-offs. PPL Electric has linked payments completed through the Website or IVR to its electronic system that produces work orders for field personnel who, among other things, terminate electric service. For example, if a termination was scheduled for Monday and the customer made a payment -- such as the full overdue balance or an amount sufficient to reinstate a defaulted payment agreement -- on a Saturday or Sunday through the Website or IVR, the system would automatically cancel the termination field order and update the Company's customer information system.

28. PPL Electric believes that allowing residential customers to establish, within limits, payment agreements via the Website or IVR provides substantial benefits to its customers. Important benefits for customers include, but are not limited to, the following: (a) providing two additional means by which customers may enter into payment agreements to avoid termination; (b) providing a means by which customers can, within limits, respond to termination notices outside normal business hours; (c) responding to the growing use of online and automated

resources to manage billing and payment matter; (d) avoiding further collection action, such as termination of service; (e) offering options to customers, such as making an immediate payment or establishing a payment agreement, that fit their needs; and (f) providing automatic referrals to assistance programs, such as Customer Assistance Programs, for eligible customers.

29. Similarly, PPL Electric believes that allowing residential customers to establish payment agreements via the Website or IVR provides substantial benefits to PPL Electric. Key benefits for PPL Electric include, but are not limited to, the following: (a) improving customer satisfaction; (b) providing more flexibility to customers in addressing their overdue bills; (c) reducing Commission complaints, including Payment Assistance Requests; and (d) helping PPL Electric to better manage its significant increase in call volume.

**B. The Expanded Website and IVR Systems Comply with Section 56.97(a).**

30. As noted above, Section 56.97 requires that an “authorized utility employee” must, prior to actual termination, “explain” the reasons for the termination, all available methods for customers to avoid the termination, and medical emergency procedures.

31. PPL Electric believes that Section 56.97 should be not be interpreted to restrict a utility company’s ability to offer additional options for customers to avoid termination; rather, Section 56.97 should be interpreted to reasonably permit utility companies to develop and implement new technologies for the convenience of their customers.

32. PPL Electric recognizes that the purpose of requiring an authorized utility employee to explain this information to avoid termination of service is to prevent any unnecessary terminations. This requirement ensures that customers are provided with accurate information and that there is actual authority to enter a payment agreement, thereby avoiding termination.

33. PPL Electric believes that its proposed pilot to expand its Website and IVR capabilities to allow customers, in defined circumstances, to avoid termination by establishing a payment agreement complies with the spirit and purpose of Section 56.97(a). The proposed pilot to expand the Website and IVR capabilities will provide customers with additional options to set up payment agreements to avoid termination. Under either option, customers will have the option to speak directly with a Customer Service Representative between the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday, to discuss reasons for the proposed termination, available methods for avoiding termination, medical emergency procedures, or any other questions the customer may have.

34. As explained above, customers are informed about the reasons for termination through receipt of the 10-day termination notice. Under the proposed pilot Website and IVR systems, the initial welcome screen (Website) or prompt (IVR) will further provide information such as the balance, past due amount, and scheduled termination of service date.

35. After receiving an initial termination notice customers will have the option, within certain limitations, to set up payment agreements to avoid termination through the Website or IVR systems. Customers will be automatically and accurately advised of all available methods for avoiding termination through links on the Website system and automated prompts on the IVR system. Further, once a customer selects an available payment agreement through either the Website or IVR system, the customer is automatically enrolled in the selected program and the proposed termination is canceled.

36. Additionally, as explained above, customers will also be provided with information about medical certifications under the proposed pilot to expand the Website and IVR systems.

37. Customers will have the same options on the Website and IVR that they would when speaking to a Customer Service Representative. Further, Customers will be required to call PPL Electric if they are within three days of a proposed termination of service date. Anytime a customer disagrees with the terms of the payment agreement offered, they will always have the option to call the Company for clarification or to dispute PPL Electric's actions. The systems will offer all appropriate universal service programs and, when appropriate, make automatic referrals to specific programs, such as CAP. The systems will automatically void termination orders when the right conditions exist; provide messages to customers if they should cancel a transaction; and send electronic or written confirmatory communications after the completion of a Website or IVR transaction.

38. As explained above, the pilot systems will provide reminders that customers may speak with a Customer Service Representative at numerous points during the payment arrangement process. Importantly, customers using PPL Electric's pilot Website or IVR systems to establish a payment agreement will always have the option to speak directly with a Customer Service Representative between the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday. Therefore, even if a customer elects to use the Website or IVR systems, customers are provided with the opportunity to directly contact a Customer Service Representative who can orally explain the reasons for the proposed termination, and review all available methods for avoiding termination and explain medical emergency procedures.

39. For these reasons, PPL Electric believes that its pilot to expand its Website and IVR capabilities to allow customers to establish a payment agreement to avoid termination, together with the continued ability to directly contact a Customer Service Representative at any

time during the Call Center hours of operation, is consistent with and in compliance with the requirements and purpose of Section 56.97(a) of the Commission's Regulations.

**C. In the Alternative, the Expanded Website and IVR Systems Should Be Granted a Two-Year Waiver from Section 56.97(a).**

40. In the event that the Commission determines that PPL Electric's pilot to expand its Website and IVR capabilities is not in compliance with the requirements of Section 56.97(a), PPL Electric respectfully requests that the Commission grant the pilot a two-year waiver from strict compliance with Section 56.97(a).

41. As discussed above, in 2009 nearly 50 percent of customer interactions with PPL Electric were "self-service" interactions, *i.e.*, via the Website or IVR. It cannot be reasonably disputed that consumers are completing more and more interactions with businesses of all types through online and/or automated systems. Similarly, these types of self-service interactions for PPL Electric are continuing to grow every year. PPL Electric believes that its pilot to expand its Website and IVR capabilities is consistent with the commonplace practice of self-service transactions.

42. Given customers' proclivity to use online and automated means for completing transactions, PPL Electric believes that offering customers the opportunity to establish payment agreements provides better service by giving customers more flexibility and options to avoid termination.

43. As explained above, customers using the Website or IVR to establish a payment agreement would have numerous opportunities to speak with a PPL Electric Customer Service Representative. Further, after completing a transaction, the Company sends the customer a confirmatory communication via e-mail or letter, which provides PPL Electric's toll-free telephone number and Call Center hours of operation. The pilot also provides an additional

customer safeguard by requiring that customers within three days of their scheduled termination date must call PPL Electric to discuss how they can avoid termination of service. Stated otherwise, customers will be unable to set up payment agreements on either the Website or IVR systems if they are within three days from the scheduled termination date and, instead, must speak directly with a Customer Service Representative.

44. As explained in paragraphs 28 and 29, *supra*, which are incorporated as if fully set forth herein, the pilot to expand the Website and IVR capabilities to permit customers to establish payment agreements to avoid termination provides several important benefits to both PPL Electric and its customers. PPL Electric believes that its pilot to expand the Website and IVR systems is reasonable, effective, and in the public interest. Accordingly, PPL Electric is requesting, in the alternative, that its pilot to expand the Website and IVR capabilities be granted a two-year waiver from the requirement in Section 56.97(a) that an “authorized employee explain” the reasons for the proposed termination and the available methods for avoiding termination.

45. Additionally, PPL Electric believes that a two-year waiver is appropriate because the Commission has initiated a proposed rulemaking at Docket No. L-00060182 to amend Chapter 56 of the Commission’s Regulations. Therein, the Commission has solicited comments from interested parties regarding, *inter alia*, appropriate changes to Chapter 56 due to the impact of electronic or online transactions. Because the rulemaking process is necessarily complex, detailed, and time consuming, PPL Electric does not want to disadvantage residential customers who would directly benefit from the convenient options to avoid termination offered by the Website and IVR systems proposed by PPL Electric.

46. If the Commission approves the pilot or, in the alternative, grants a two-year waiver from Section 56.97(a) in a timely manner, PPL Electric would be able to gather practical experience in offering payment agreements through the Website and IVR systems. This type of experience could prove valuable in providing additional comments to the Commission regarding its Chapter 56 rulemaking.<sup>2</sup>

47. PPL Electric also seeks a two-year waiver from Section 56.97(a) because it needs time to implement and, if needed, adjust its communications plan to not only inform customers about the availability of the Website and IVR payment agreement option, but also to encourage customer participation. As explained above, the additional options provided by the pilot offer several important benefits to customers. However, PPL Electric will need some time to build customer participation in the proposed Website and IVR systems to properly evaluate their effectiveness. After implementing appropriate customer communications to inform customers of the availability of the expanded capabilities, PPL Electric will closely monitor and track customer usage of the Website or IVR systems to establish payment agreements.

48. Based on the foregoing, the proposed pilot to expand PPL Electric's Website and IVR capabilities to allow customers to avoid termination by establishing payment agreements provides important benefits to both PPL Electric and its customers and, therefore, is in the public interest. Accordingly, in the event that the Commission determines that PPL Electric's pilot to expand its Website and IVR capabilities is not in compliance with the requirements of Section 56.97(a), PPL Electric respectfully requests that the Commission grant the pilot a two-year waiver from Section 56.97(a).

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<sup>2</sup> In its Comments submitted in response to the Commission's proposed rulemaking at Docket No. L-00060182, PPL Electric suggested that the Commission may want to consider opening a separate docket in the future to address the impact of technological changes on Chapter 56 of the Commission's Regulations.

#### **IV. CONCLUSION**

49. PPL Electric believes that its pilot to expand its Website and IVR capabilities to allow customers, under defined circumstances, to establish a payment agreement to avoid termination, together with the continued ability to directly contact a Customer Service Representative at any time during the Call Center hours of operation, is consistent with and in compliance with the requirements and purpose of Section 56.97(a) of the Commission's Regulations. Accordingly, PPL Electric requests that the Commission enter an order declaring that the proposed pilot complies with Section 56.97(a) and approve PPL Electric's implementation of the expanded Website and IVR systems as set forth herein.

50. PPL Electric's Website and IVR capabilities to allow customers to avoid termination by establishing payment agreements provides important benefits to both PPL Electric and its customers and, therefore, is in the public interest. In the event that the Commission determines that the pilot is not in compliance with the requirements of Section 56.97(a), PPL Electric respectfully requests that the Commission grant PPL Electric's pilot to expand its Website and IVR capabilities a two-year waiver from strict compliance with Section 56.97(a).

51. PPL Electric further requests that the Commission consider this Petition on an expedited basis. Timely approval of this Petition is important to PPL Electric for several reasons. Utilities typically experience a significant increase in call volume when they begin to terminate residential service for non-payment of bills following the end of the winter termination moratorium on April 1. PPL Electric has prepared for this increase in call volume, but the challenges are more difficult in 2010 due to the expiration of PPL Electric's generation rate cap, as well as the duration and low temperatures of the past winter season. Both of these factors

have increased electric bills and have contributed to an increase in call volume.<sup>3</sup> Expedited approval of this Petition will help maintain and/or reduce the call volume and, more importantly, provide customers with additional options to conveniently arrange for payment programs to avoid termination.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Commission declare that the proposed pilot to expand the Website and IVR systems is in compliance with 52 Pa. Code § 56.97(a) or, in the alternative, grant the expanded Website and IVR systems a two-year waiver from 52 Pa. Code § 56.97(a).

Respectfully submitted,

Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
Two North Ninth Street  
Allentown, PA 18106  
Phone: 610-774-4254  
Fax: 610-774-6726  
E-mail: perussell@pplweb.com

  
\_\_\_\_\_  
David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Phone: 215-587-1197  
Fax: 215-320-4879  
E-mail: dmacgregor@postschell.com

Of Counsel:

Post & Schell, P.C.

Michael W. Hassell (ID # 34851)  
Christopher T. Wright (ID # 203412)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: mhassell@postschell.com  
E-mail: cwright@postschell.com

Date: April 7, 2010

*Attorneys for PPL Electric Utilities Corporation*

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<sup>3</sup> Additionally, PPL Electric has received an unprecedented number of telephone calls from customers who are shopping for generation suppliers. Approximately 395,000 customers have shopped and selected generation supply from 28 suppliers.

