

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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May 12, 2010

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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 a Payment Agreement or, in the Alternative, a Two-Year Waiver of 52 Pa. Code § 56.97(a) Docket No. P-2010-2168786

Dear Secretary Chiavetta:

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 black ink that reads "Barrett Sheridan".

Barrett C. Sheridan
Assistant Consumer Advocate
PA Attorney I.D. # 61138

Enclosures

cc: Administrative Law Judge
Office of Special Assistants

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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 : Docket No. P-2010-2168786
Response Capability to Allow Customers :
the Option of Setting Up a Payment :
Agreement or, in the Alternative, a Two-Year :
Waiver of 52 Pa. Code § 56.97(a) :

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:

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Respectfully submitted,



Barrett C. Sheridan
Assistant Consumer Advocate

DATED: April 28, 2010
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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. § 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file an Answer and Intervention and participate in proceedings before the Commission involving the Petition of PPL Electric Utilities Corporation (PPL).

On April 7, 2010, PPL Electric Utilities Corporation (PPL or Company) filed a petition which requests that the Public Utility Commission (PUC or Commission) permit the Company to develop payment arrangements for customers facing termination through the use of the Company's website or interactive voice response (IVR) telephonic service.¹ PPL acknowledges that Section 56.97(a) "Procedures upon Ratepayer or Occupant Contact Prior to Termination," 52 Pa. Code § 56.97(a), explicitly requires PPL to make available "authorized utility employees" to provide specific, identified information to customers who are facing termination. PPL asks the PUC to issue a declaratory order that contact with the IVR system or website constitutes a contact with an "authorized utility employee" or, in the alternative, grant a waiver so that PPL may proceed to implement a pilot program to offer PPL's website or IVR as alternatives to the personal contact by a customer with a PPL employee under Section 56.97(a). PPL requests expedited review and approval.

The Office of Consumer Advocate files an Answer and Intervention in this proceeding to ensure that the interests of consumers are protected in this proceeding.

¹ PPL served its Petition again on April 22, 2010 on all parties to the Commission's Chapter 56 Rulemaking at Docket No. L-00060182. PPL provided expanded notice of its Petition at the request of Law Bureau.

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities Corporation :
for a Declaratory Order Regarding a Pilot :
to Expand Website and Interactive Voice : Docket No. P-2010-2168786
Response Capability to Allow Customers :
the Option of Setting Up a Payment :
Agreement or, in the Alternative, a Two-Year :
Waiver of 52 Pa. Code § 56.97(a) :

I hereby certify that I have this day served a true copy of the foregoing document, 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 12th day of May 2010.

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