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June 23, 2010

### VIA HAND DELIVERY

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**RE: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period of January 1, 2011 through May 31, 2013 to Modify Its Procurement of Solar Energy Credits; Docket No. P-2008-2060309**


Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") are the original and three (3) copies of the Petition to Intervene on behalf of the PP&L Industrial Customer Alliance ("PPLICA") in the above-referenced proceeding.

As indicated on the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of this transmittal letter and Petition to Intervene, and kindly return them for our filing purposes.

Very truly yours,

McNEES WALLACE & NURICK LLC

By   
Shelby A. Linton-Keddie

Counsel to PP&L Industrial Customer Alliance

SLK/km

c: Administrative Law Judge Susan D. Colwell (via Hand Delivery)  
Certificate of Service

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PETITION TO INTERVENE OF THE  
PP&L INDUSTRIAL CUSTOMER ALLIANCE**

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TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71-5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71-5.74, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Petition to Intervene in the above-captioned proceeding. In support thereof, PPLICA avers as follows:

1. Petitioner is PPLICA, which for purposes of this proceeding includes the companies listed on Attachment "A" to this Petition. The list on Attachment "A" will be updated if necessary during this proceeding.

2. The names and address of PPLICA's attorneys are:

Pamela C. Polacek (Pa. I.D. No. 78276)  
Shelby A. Linton-Keddie (Pa. I.D. No. 206425)  
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3. On May 18, 2010, the PPL Electric Utilities Corporation ("PPL" or "Company") filed a Petition for Approval to Modify Its Procurement of Solar Alternative Energy Credits Under its

2011-2013 Default Service Procurement ("DSP") Plan. Through this Petition, PPL requests to amend its current Commission-approved DSP Plan to change the method of acquiring Tier I solar alternative energy credits ("SRECs") as required by the Alternative Energy Portfolio Standards ("AEPS") Act. Specifically, rather than acquiring all SRECs from wholesale suppliers as part of their bid price, PPL proposes to acquire some SRECs pursuant to multi-year contracts awarded through a separate procurement process. PPL purportedly is requesting this modification in order to align its DSP with the goals of the Commission's proposed Solar Policy Statement, which is to encourage the development of new Solar Photovoltaic projects.

4. In addition, PPL also seeks to modify its Generation Supply Charges (GSC-1 and GSC-2) to provide for the treatment of all costs and credits associated with the procurement of SRECs. Specifically, the Company proposes to allocate both the costs and credits for SRECs between the residential and small commercial and industrial ("C&I") classes based on an annual ratio that reflects the forecasted MWhs for the year for these classes. Because PPL's Large C&I customers are not served under the Company's full requirements contracts, the Company states that Large C&I customers are not affected by this proposal.

5. PPLICA is an ad hoc association of energy-intensive commercial and industrial customers receiving electric service in PPL's service territory. PPLICA members purchase service from PPL primarily under Rate Schedules LP-4, LP-5, LP-6, IS-P, and IS-T, as well as available riders.<sup>1</sup> PPLICA members collectively consume approximately 1.74 billion kWh of electricity annually in manufacturing and other processes, and electricity costs comprise a significant portion of their production costs.

6. As stated above, the proposed modifications to the Company's DSP Plan do not apply to Large C&I customers; however, changes to PPL's collection of costs associated with SRECs

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<sup>1</sup> Some PPLICA members also have accounts on Rate Schedules GS-1 and GS-3.

could be raised by other parties that may have an effect on Large C&I customers. The costs and risks associated with SRECs procured for residential and small C&I customers should be borne only by those customers, and not by Large C&I customers. PPLICA has an interest in participating in this proceeding to address these issues and others that may be raised.

7. PPLICA members may be directly affected by the Commission's resolution of the above-captioned proceeding. As some of PPL's largest retail customers, PPLICA members have an interest in this proceeding that is not represented by any other party of record; consequently, PPLICA satisfies the standards for intervention under Section 5.72 of the Commission's regulations. See 52 Pa. Code § 5.72.

**WHEREFORE**, the PP&L Industrial Customer Alliance respectfully requests that the Commission grant this Petition to Intervene and provide the PP&L Industrial Customer Alliance with full-party status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By



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Counsel to the PP&L Industrial Customer Alliance

Dated: June 23, 2010

**ATTACHMENT "A"**

**PP&L INDUSTRIAL CUSTOMER ALLIANCE**

Air Products and Chemicals, Inc.  
Armstrong World Industries, Inc.  
Cinram Manufacturing Inc.  
General Dynamics-OTS Scranton  
Hercules Cement Company  
High Industries, Inc.  
Lafarge North America  
Linde LLC  
Rieter Automotive North America, Carpet  
SAPA Extrusions, Inc.  
The Hershey Company  
TIMET North America  
Wegmans Food Markets, Inc.

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**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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Counsel to the PP&L Industrial Customer Alliance

Dated this 23<sup>rd</sup> day of June, 2010, at Harrisburg, Pennsylvania.

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