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File #: 2507/140074

June 28, 2010

BY E-FILE

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Tom Harrison v. PPL Electric Utilities Corporation
Docket No. C-2010-2181518

Dear Secretary Chiavetta:

Enclosed are the Preliminary Objections of PPL Electric Utilities Corporation in the above-referenced proceeding. As indicated by the certificate of service, a copy has been provided to Mr. Harrison in the manner indicated.

Respectfully Submitted,

A handwritten signature in black ink that reads 'John H. Isom'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

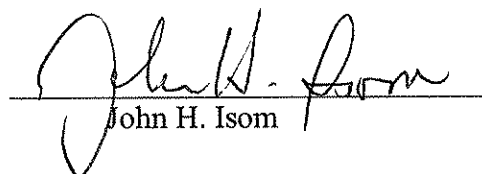
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Preliminary Objections of PPL Electric Utilities Corporation has 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

Tom Harrison
14 Creekside Drive
Millersville, PA 17551

Date: June 28, 2010


John H. Isom

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Tom Harrison	:	
	:	
v.	:	Docket No. C-2010-2181518
	:	
PPL Electric Utilities Corporation	:	
	:	

NOTICE TO PLEAD

You are required to file and serve a reply to the Preliminary Objections within 10 days after service of these Preliminary Objections. Failure to file a timely reply to the Preliminary Objections may be deemed a default, and the Preliminary Objections may be granted on that basis.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Tom Harrison	:	
	:	
v.	:	Docket No. C-2010-2181518
	:	
PPL Electric Utilities Corporation	:	
	:	

PRELIMINARY OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”) hereby submits, pursuant to 52 Pa. Code § 5.101(a)(3) and § 5.101(e), its Preliminary Objections to the Complaint of Tom Harrison:

1. On June 7, 2010, the Complainant, Tom Harrison, filed with the Pennsylvania Public Utility Commission (“Commission”) a Complaint against PPL Electric.

2. There, Mr. Harrison avers generally that PPL Electric is not prudently administering a “program to reduce electrical/energy use.” Although Mr. Harrison does not specifically identify the program to which he is referring, PPL Electric believes that he is referring to PPL Electric’s Winter Relief Assistance Program, which is generally referred to as the “WRAP.”

3. The primary objectives of PPL Electric’s WRAP are to reduce energy usage in electric bills of low-income customers and to increase the ability of low-income customers to pay for electric service (or at least decrease arrearages).

4. In order to achieve these objectives, PPL Electric offers a series of services and conservation measures that are designed to reduce energy usage by low-income customers, and therefore, reduce their electric bills.

5. Examples of the services and conservation measures that PPL Electric makes available to qualifying low-income customers under the WRAP include adding insulation, caulking, weather-stripping, installing door sweeps, installing storm windows, replacing windows, installing programmable thermostats, repairing retrofitting and replacing heating equipment and repairing or replacing central cooling systems.

6. Mr. Harrison avers that PPL Electric's WRAP has been wasteful. Such averments, however, are extremely general and lack all details and specifics.

a. For example, Mr. Harrison avers that: "Work was not done to specs and paid for."

b. Mr. Harrison avers also that: "Work was incomplete and paid for."

c. Another example of Mr. Harrison's averments regarding the WRAP is that: "Refrigerators were touted as being Energy Efficient when they were rated worst."

7. Mr. Harrison, however, has failed to provide even fundamental information regarding his averments. Such detailed information is necessary to enable PPL Electric to identify the transactions about which Mr. Harrison is complaining and investigate such transactions to determine what actually occurred.

8. In this regard, it should be recalled that the WRAP was initiated in 1985 and that the current annual WRAP budget is approximately \$8 million. Under the WRAP, services and conservation measures are provided at thousands of residences of thousands of low-income customers each year. Without substantial further information that would permit PPL Electric to identify the transactions about which Mr. Harrison is concerned and enable it to conduct a

reasonable investigation of Mr. Harrison's averments, it will be impossible for PPL Electric to obtain and provide specific responses to Mr. Harrison's concerns.

9. Mr. Harrison should be required to provide a more specific pleading. For example, regarding his averment that: "Work was not done to specs and paid for," Mr. Harrison should be required to state the locations of the residences where the work was done, when the work was done, the specifications that were, in his opinion, not met and the manner in which the work, in his opinion, did not meet required specifications. Absent such information, PPL Electric will be unable to investigate Mr. Harrison's averments and respond in a meaningful manner.

10. Similarly, regarding his averment that: "Work was incomplete and paid for," Mr. Harrison should be required to state when the work was done, state the locations of the residences at which work was not completed and explain which portions of the work were, in his opinion, incomplete.

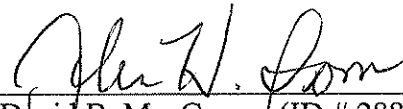
11. Regarding Mr. Harrison's averment that: "Refrigerators were touted as being Energy Efficient when they were rated worst," Mr. Harrison should be required to state when the refrigerators were provided, state the locations of the residences where such refrigerators were provided and the basis for his belief that the refrigerators provided "were rated worst."

12. The above are simply examples of the types of averments and shortcomings of Mr. Harrison's Complaint. In order to permit PPL Electric to respond in a meaningful manner to all of Mr. Harrison's averments, he must be required to provide sufficient information to allow PPL Electric to be able to identify and investigate the transactions about which Mr. Harrison is concerned for each averment that he wishes to pursue.

13. PPL Electric cannot reasonably be expected to attempt to investigate all of the thousands of annual transactions that are done and services that are provided under the WRAP in order to respond to Mr. Harrison's Complaint. If he has specific information regarding his averments that would allow PPL Electric to identify and investigate the transactions that are the subjects of his Complaint, he should provide such information. Otherwise, his Complaint should be dismissed.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission grant these Preliminary Objections and order Mr. Harrison to provide specific information regarding each of his averments.

Respectfully submitted,



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Of Counsel:

Post & Schell, P.C.

Date: June 28, 2010