



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE
M-2010-1505410

August 25, 2010

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

Re: Pennsylvania Public Utility Commission
Law Bureau Prosecutory Staff
v.
PPL Electric Utilities Corporation
Docket No. M-2010-1505410

RECEIVED
2010 AUG 25 PM 3:00
PA PUC
SECRETARY'S BUREAU

Dear: Secretary Chiavetta

The Law Bureau Prosecutory Staff (LBPS), on behalf of the Commission's Bureau of Consumer Services (BCS) files this response to the late comments filed by Tom Harrison regarding the settlement in the above-referenced matter. Although Mr. Harrison's comments were filed late, and should have no bearing on this settlement, we are, for the purposes of clarification, responding to his comments.

Specifically, LBPS and BCS would like to address Mr. Harrison's comment that nothing has changed in the PPL low-income usage reduction program (LIURP). As pointed out in paragraph 14 of the LBPS Statement in Support of Settlement, based on a thorough review of PPL's operations and management of its LIURP, staff found that PPL has made improvements since 2007. In particular, BCS has information that demonstrates a marked increase in electricity savings for LIURP projects for 2008 when compared with 2007 projects. The changes to PPL's internal policies, procedures and controls proposed in the settlement will further improve the effectiveness of this important program.

Furthermore, as pointed out in paragraph 17 of the LBPS Statement in Support of Settlement, PPL has demonstrated a willingness to improve its operations and management such that the imposition of a civil penalty is unnecessary at this time to induce future compliance. Finally, as stated in paragraph 18 of the LBPS Statement in Support of Settlement, LBPS and BCS believe that the settlement is in the public

interest as it effectively addresses the areas of PPL's operations and management of its LIURP, such that this program will be more effective in providing benefits to its future LIURP participants.

Thank you for giving the LBPS and BCS an opportunity to reply to comments filed in the above-referenced matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Kriss E. Brown", written over a horizontal line.

Kriss E. Brown
Assistant Counsel
Law Bureau Prosecutory Staff

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cc: Wayne T. Scott, First Deputy Chief Counsel