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August 26, 2010

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

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2010 AUG 26 PM 3:05
PA PUC
SECRETARY'S BUREAU

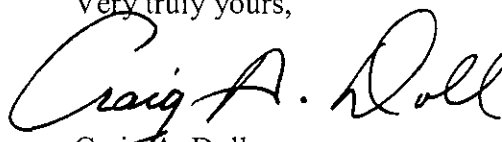
Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
R-2010-2161694

Dear Secretary Chiavetta:

Enclosed for filing is the Statement of Richards Energy Group, Inc. in Support of Partial Settlement, in the above proceeding. Copies have been served in the manner set forth on the Certificate of Service appended to the Statement.

If you have any questions, please feel free to contact this office.

Very truly yours,


Craig A. Doll

CAD/kmv
Enclosure

cc: Honorable Susan D. Colwell, Administrative Law Judge
Per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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2010 AUG 26 PM 3:06
PA. PUB.
SECRETARY'S BUREAU

Pennsylvania Public Utility
Commission, *et al.*

v.

Docket No. R-2010-2161694, etc.

PPL Electric Utilities Corporation

STATEMENT OF RICHARDS ENERGY GROUP, INC.
IN SUPPORT OF THE JOINT PETITION FOR
PARTIAL SETTLEMENT OF RATE INVESTIGATION

TO THE HONORABLE SUSAN D. COLWELL, ADMINISTRATIVE LAW JUDGE:

Richards Energy Group, Inc. (“Richards”), an Intervener in the above-captioned distribution rate proceeding, files this Statement in Support, requesting that Your Honor recommend that the Pennsylvania Public Utility Commission (“Commission”) approve the Joint Petition for Partial Settlement of Rate Investigation (“Partial Settlement”) filed on behalf of the signatory parties. Within its Prehearing Memorandum, Richards raised six issues which it planned to address within the context of this proceeding:

1. Whether PPL’s cost of service study appropriately reflects the Commonwealth Court decision in *Lloyd v. Pennsylvania Public Utility Commission*, 904 A.2d 1010 (Pa. Cmwlth. 2006). Commission issue No. 3.
2. Whether the shifting of revenue recovery from kWh charges to customer and demand charges is just and reasonable. Commission issue No. 5.
3. Whether the reallocation of revenues from a minimum charge to a customer charge and increased demand charge is just and reasonable. While Richards recognizes that elimination of the minimum demand charge for commercial and industrial customers appears to be reasonable, Richards is concerned that the level of proposed customer

charges and increases in demand charges may not be just and reasonable. Commission issue No. 7.

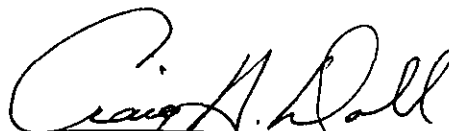
4. Richards seeks clarification of PPL's proposal involving net metering for shopping customers. Commission issue No. 11.
5. Richards seeks clarification of the imposition of the Merchant Function charge being added to transmission services. Commission issue No. 12.
6. Richards will also address various tariff updates. Commission issue No. 14.

Of the issues raised by Richards both in its Prehearing Memorandum and the testimony of Mr. Frank Richards, most have been reserved for litigation and will be the subject of Main and Reply Briefs filed by Richards. However, one of the tariff issues has been resolved within the context of the Partial Settlement. As set forth at paragraph 27 of the Partial Settlement, PPL has agreed to adopt a language revision suggested by Richards. Through this language change, PPL has clarified that *standard service includes both overhead and underground service* thereby assuring that low tension network customers will continue to have available to them both overhead and underground service.

Richards has taken no position with respect to the other portions of the Partial Settlement and does not oppose their adoption by the Commission. As stated previously, Richards will address those issues specifically reserved within the Partial Settlement within the context of its Main and Reply Briefs. Richards believes that the adoption of the Partial Settlement will be in

the public interest and respectfully requests that Your Honor recommend its adoption to the Commission.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Craig A. Doll". The signature is written in a cursive style with a large initial "C".

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Attorney I.D. # 22814

Attorney for Richards Energy Group, Inc.

Dated: August 26, 2010

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2010-2161694
 :
 PPL Electric Utilities Corp. :

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the Statement in Support of Richards Energy Group, Inc. in Support of the Joint Petition for Partial Settlement upon the persons listed below via first class mail, postage prepaid in accordance with the provisions of 52 Pa. Code §1.54.

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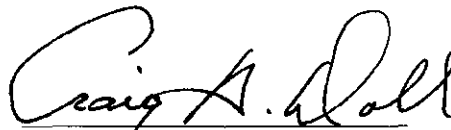
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DATED: August 26, 2010