

Gary A. Jeffries  
Assistant General Counsel



**Dominion Resources Services, Inc.**  
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September 23, 2010

**By eFiling**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: John C. McBride v. Dominion Retail, Inc.: Docket No. C-2010-2197014**

**MOTION TO JOIN INDISPENSABLE PARTY**

Dear Secretary Chiavetta:

On behalf of Dominion Retail, Inc. d/b/a Dominion Energy Solutions ("DES"), the Respondent in the above-referenced matter, enclosed via eFiling please find the above-referenced pleading.

A copy of this filing is also being served on the Complainant and counsel for PPL Electric Utilities Corporation this date by first-class U.S. Mail.

Pursuant to 52 Pa. Code §5.103(c), a party has 20 days from the date of service within which to answer or object to a motion, unless the period of time is otherwise fixed by the Commission or the presiding officer.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gary A. Jeffries".

Gary A. Jeffries  
Assistant General Counsel

Enclosures

cc: John C. McBride, 1111 Independence Ct., West Lawn, PA 19609  
Paul E. Russell, Esq., PPL Electric Utilities Corporation, Two North Ninth Street, Allentown, PA 18101-1179



2. During the approximately 6 months that he was a DES customer, Complainant never contacted the DES call center.
3. Complainant states in paragraph 5 of the Complaint that *“The relief we would request is the amount of \$781.01 to be cancelled. This amount is the amount we believe Dominion Energy Solutions charged us when we were serviced by them along with PPL.”* It is unclear how Complainant arrived at this dollar figure. Moreover, other than generally hinting that DES is somehow responsible for his higher electric bills, neither does Complainant allege any particular wrongdoing on the part of DES or point to anything to support his effort to avoid paying for the electricity that DES delivered to his residence and which he consumed. However, he is clearly asking the Commission to enable him to do just that.
4. In paragraphs 4 and 5 of the Complaint, the Complainant references a conversation he had with PPL—but which did not include DES—in which he recounts that upon calling PPL to complain about his bill PPL told him to *“call Dominion to cancell (sic) our services with them. Thus, we did cancel Dominion on 7-6-10”*. Thus, according to Complainant himself, PPL played a role in Complainant’s cancellation of service with DES. PPL’s input may also have been a factor in Complainant’s requested relief to be excused from paying his DES charges.
5. Given the above facts, PPL has firsthand knowledge and possession of information relevant to this complaint and in particular the Complainant’s requested relief.
6. As such, PPL’s joinder in this matter is indispensable to resolving this matter and is respectfully requested.

**Pursuant to 52 Pa. Code §5.103(c), a party has 20 days from the date of service within which to answer or object to a motion, unless the period of time is otherwise fixed by the Commission or the presiding officer.**

WHEREFORE, for good cause shown, DES respectfully moves the Commission for the joinder of PPL Electric Utilities as an indispensable party in this proceeding.

DOMINION RETAIL, INC.

DATED: September 23, 2010

By: \_\_\_\_\_

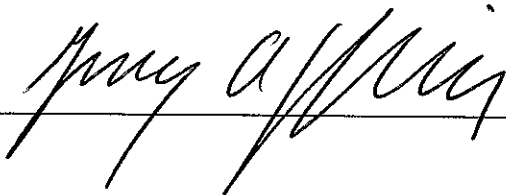
  
Gary A. Jeffries  
Assistant General Counsel

**VERIFICATION**

COMMONWEALTH OF PENNSYLVANIA )  
 ) SS.  
COUNTY OF ALLEGHENY )

I, Gary A. Jeffries, Assistant General Counsel and Assistant Secretary, Dominion Retail, Inc., hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information, and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: September 23, 2010

  
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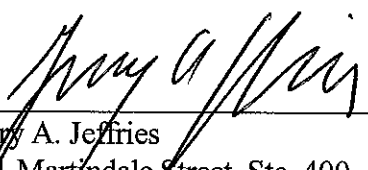
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the entities, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant).

John C. McBride  
1111 Independence Ct  
West Lawn, PA 19609

Paul E. Russell, Esquire  
PPL Electric Utilities Corporation  
Two North Ninth Street  
Allentown, PA 18101-1179

Dated this 23<sup>rd</sup> day of September, 2010.

  
\_\_\_\_\_  
Gary A. Jeffries  
501 Martindale Street, Ste. 400  
Pittsburgh, PA 15212