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October 25, 2010

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

VIA HAND DELIVERY

RE: PPL Electric Utilities Corporation Universal Service and Energy Conservation Plan (2011-2013); Docket No. M-2010-2179796

Dear Secretary Chiavetta:

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

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp an extra copy of this transmittal letter, the Petition, and the Prehearing Memorandum, and kindly return them for our filing purposes. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Shelby A. Linton-Keddie

Counsel to the PP&L Industrial Customer Alliance

lmc
Enclosures

c: Honorable Susan D. Colwell – via E-Mail and Hand Delivery
Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation Universal :
Service and Energy Conservation Plan for : Docket No. M-2010-2179796
2011 Through 2013 :

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

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 June 1, 2010, PPL Electric Utilities Corporation ("PPL" or "Company") filed its Universal Service and Energy Conservation Plan for 2011 through 2013 ("Plan") in accordance with Section 54.74 of the Commission's Regulations, 52. Pa. Code § 54.74, requiring

jurisdictional electric utilities to file such a plan for Commission approval every three years. Through its Plan, PPL proposes to amend its various Universal Service, customer assistance, low-income, and hardship programs, including: (1) the OnTrack program; (2) the Winter Relief Assistance Program ("WRAP"); (3) Operation HELP; and (4) the Customer Assistance and Referral Evaluation Service ("CARES") program.

4. 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.¹ 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.

5. Changes to PPL's Plan may have an effect on Large C&I customers. The costs and risks associated with Universal Service and Energy Conservation plans should be borne only by those customers benefiting from the Plans, 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.

6. 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.

7. While PPLICA was aware that the Prehearing Conference for this proceeding is to be held on Friday, October 29, 2010 at 10 A.M. in Hearing Room 2, in anticipation of drafting a Prehearing Memorandum for this proceeding, PPLICA only became aware on October 25, 2010,

¹ Some PPLICA members also have accounts on Rate Schedules GS-1 and GS-3.

that a Prehearing Conference Order was issued in this proceeding that required, in part, that "on or before 12:00 p.m., **Monday, October 2[5], 2010**, each litigating party shall file and serve a prehearing memorandum which shall include a list of issues and sub-issues in this proceeding which the party intends to address and a statement of the party's position on each of the issues and sub-issues listed, and the names, business address, and telephone numbers of witnesses the party expects to call and the subject matter of each witness' testimony." Because PPLICA had not intervened prior to this date, PPLICA was not served with a copy of the Prehearing Conference Order.

8. Accordingly, to the extent that this Petition to Intervene is deemed to be late-filed under Section 5.74, PPLICA notes that, according to 52 Pa. Code Section 5.74(a), a Petition to Intervene may be filed after the established date if good cause is shown. In this instance, because PPLICA was not aware of the Administrative Law Judge's Prehearing Conference Order until October 25, 2010, PPLICA was unable to meet the ALJ's noon, October 25, 2010, deadline.

9. In evaluating late-filed Petitions to Intervene, the Commission considers whether the proceeding is contested at the time of filing. As indicated by the Commission's September 24, 2010, Order, this proceeding is contested by Mr. Epstein as well as SEF.² Because PPLICA's Petition to Intervene and Prehearing Memorandum are being filed within hours after the due date for such filing, no party should be unfairly prejudiced or assume any additional burden as a result of the Commission's granting of this Petition. Moreover, a Prehearing Conference for this proceeding has not yet occurred, as it is scheduled for October 29, 2010. Accordingly, because the procedural schedule for this proceeding has not yet been determined by the ALJ, granting PPLICA's Petition at this time would not unfairly prejudice the other parties. In addition,

² The Office of Consumer Advocate has also filed a Notice of Intervention.

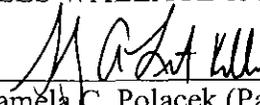
granting PPLICA's Petition to Intervene will not significantly broaden the issues in this proceeding. For these reasons, PPLICA posits that good cause has been shown, as required under 52 Pa. Code Section 5.74(a), and the Commission should grant this Late-Filed Petition to Intervene.

10. For the foregoing reasons, PPLICA respectfully submits that, to the extent that this Petition is considered to be untimely, it satisfies the Commission's four-part test for late-filed Petitions to Intervene and respectfully requests that the Commission grant this Petition to Intervene.

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: October 25, 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).

VIA E-MAIL AND FIRST-CLASS MAIL

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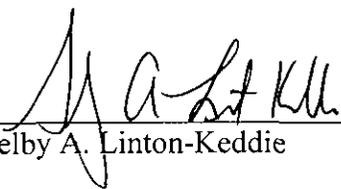
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Shelby A. Linton-Keddie

Counsel to the PP&L Industrial Customer Alliance

Dated this 25th day of October, 2010, at Harrisburg, Pennsylvania.