

Gary A. Jeffries  
Assistant General Counsel



**Dominion Resources Services, Inc.**  
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November 10, 2010

**By eFiling**

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

**Re: Stephanie Paul v. Dominion Retail, Inc.: Docket No. C-2010-2206686**

**PETITION 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), unless a different time is prescribed by statute, the Commission, or the presiding officer, an answer to a petition shall be filed with the Commission within 20 days after the date of service.**

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

Very truly yours,

Gary A. Jeffries  
Assistant General Counsel

Enclosures

cc: Stephanie Paul, 225 Matanoras Rd, Halifax, PA 17032  
Paul E. Russell, Esq., PPL Electric Utilities Corporation, Two North Ninth Street, Allentown, PA 18101-1179



on her bill, (iii) that she has received a shut-off notice, and (iv) that she wants a payment agreement. Of these, only the block pertaining to "incorrect charges" can possibly be construed to apply to DES as an electricity generation supplier. Items (i), (iii), and (iv) can only apply to PPL as the utility.

3. Given that PPL administers the billing of Complainant's account, including the DES charges, and further because the Complainant specifically complains about her PPL electric utility service, PPL's joinder in this matter is indispensable to resolving this matter and is respectfully requested.

**Pursuant to 52 Pa. Code §5.61(a), unless a different time is prescribed by statute, the Commission, or the presiding officer, an answer to a petition shall be filed with the Commission within 20 days after the date of service.**

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: November 10, 2010

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

  
Gary A. Jeffries  
Assistant General Counsel



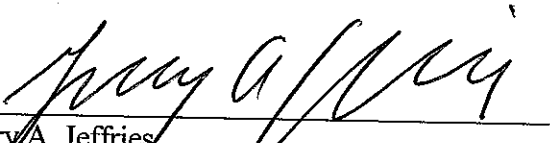
CERTIFICATE OF SERVICE

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).

Stephanie Paul  
225 Matamoras Rd  
Halifax, PA 17032

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

Dated this 10<sup>th</sup> day of November, 2010.

  
\_\_\_\_\_  
Gary A. Jeffries  
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Pittsburgh, PA 15212