



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Fax  
www.postschell.com

---

Andrew S. Tubbs

atubbs@postschell.com  
717-612-6057 Direct  
717-731-1985 Fax  
File #: 2507/140069

November 15, 2010

Pamela C. Polacek  
McNees, Wallace & Nurick  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108-1166

**RE: Petition of PPL Electric Utilities Corporation for Approval of Changes to its Act 129  
Energy Efficiency and Conservation Plan - Docket No. M-2009-2093216**

Dear Ms. Polacek:

Enclosed please find the responses of PPL Electric Utilities Corporation to Interrogatories and Requests for Production of Documents of PP&L Industrial Customer Alliance in the above-referenced proceeding.

Copies have been provided to the persons as indicated on the Certificate of Service.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew S. Tubbs".

Andrew S. Tubbs

AST/skr

Enclosures

cc: Rosemary Chiavetta (letter and certificate of service only)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA E-MAIL & FIRST CLASS MAIL

James A. Mullins  
Tanya J. McCloskey  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923  
E-Mail: [jmullins@paoca.org](mailto:jmullins@paoca.org)  
E-Mail: [tmccloskey@paoca.org](mailto:tmccloskey@paoca.org)

Allison Curtin Kaster  
Office of Trial Staff  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265  
E-Mail: [Akaster@state.pa.us](mailto:Akaster@state.pa.us)

Sharon Webb  
Office of Small Business Advocate  
Commerce Building  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101  
E-Mail: [swebb@state.pa.us](mailto:swebb@state.pa.us)

Thomas J. Sniscak  
Kevin J. McKeon  
Tori Giesler  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
PO Box 1778  
Harrisburg, PA 17105  
E-Mail: [tjsniscak@hmsk-law.com](mailto:tjsniscak@hmsk-law.com)  
E-Mail: [kjmckeon@hmslegal.com](mailto:kjmckeon@hmslegal.com)  
E-Mail: [tlgiesler@hmslegal.com](mailto:tlgiesler@hmslegal.com)  
*UGI Utilities, Inc. – Gas Division*  
*UGI Penn Natural Gas, Inc. and*  
*UGI Central Penn Gas, Inc.*

Kurt E. Klapkowski  
PA Department of Environmental Protection  
400 Market Street, 9th Floor  
Harrisburg, PA 17101-2301  
E-Mail: [kklapkowski@state.pa.us](mailto:kklapkowski@state.pa.us)  
*PA Department of Environmental Protection*

Craig R. Burgraff  
Todd A. Stewart  
Hawke, McKeon & Sniscak LLP  
Harrisburg Energy Center  
100 North Tenth Street  
PO Box 1778  
Harrisburg, PA 17105-1778  
E-Mail: [crburgraff@hmsk-law.com](mailto:crburgraff@hmsk-law.com)  
E-Mail: [TSSStewart@hmslegal.com](mailto:TSSStewart@hmslegal.com)  
*Sustainable Energy Fund for Central*  
*Eastern PA*

Pamela C. Polacek  
Shelby A. Linton-Keddie  
McNees, Wallace & Nurick  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108-1166  
E-Mail: [ppolacek@mwn.com](mailto:ppolacek@mwn.com)  
E-Mail: [skeddie@mwn.com](mailto:skeddie@mwn.com)  
*PP&L Industrial Customer Alliance*

Craig A. Doll  
25 West Second Street  
PO Box 403  
Hummelstown, PA 17036  
E-Mail: [CDoll76342@aol.com](mailto:CDoll76342@aol.com)  
*Richards Energy Group, Inc.*

Daniel Clearfield  
Kevin J. Moody  
Carl R. Shultz  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
PO Box 1248  
Harrisburg, PA 17108-1248  
E-Mail: [dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
E-Mail: [kmoody@eckertseamans.com](mailto:kmoody@eckertseamans.com)  
E-Mail: [cshultz@eckertseamans.com](mailto:cshultz@eckertseamans.com)  
*Direct Energy Business, LLC*

Mark C. Morrow  
UGI Utilities, Inc.  
460 North Gulph Road  
King of Prussia, PA 19406  
E-Mail: [morrowm@ugicorp.com](mailto:morrowm@ugicorp.com)  
*UGI Utilities, Inc. – Gas Division*  
*UGI Penn Natural Gas, Inc. and*  
*UGI Central Penn Gas, Inc.*

Kent D. Murphy  
UGI Utilities, Inc.  
460 North Gulph Road  
King of Prussia, PA 19406  
E-Mail: [murphyke@ugicorp.com](mailto:murphyke@ugicorp.com)  
*UGI Utilities, Inc. – Gas Division*  
*UGI Penn Natural Gas, Inc. and*  
*UGI Central Penn Gas, Inc.*

John K. Baillie  
Citizens for Pennsylvania's Future  
425 Sixth Avenue, Suite 2770  
Pittsburgh, PA 15219  
E-Mail: [baillie@pennfuture.org](mailto:baillie@pennfuture.org)  
*Citizens for Pennsylvania's Future*

Frank Richards  
Richards Energy Group  
781 S. Chiques Road  
Manheim, PA 17545  
E-Mail: [frichards@richardsenergy.com](mailto:frichards@richardsenergy.com)  
*Richards Energy Group, Inc.*

Eric Joseph Epstein  
4100 Hillsdale Road  
Harrisburg, PA 17112  
E-Mail: [lechambon@comcast.net](mailto:lechambon@comcast.net)  
*Eric J. Epstein, Pro se*

Carolyn Pengidore  
President/CEO  
ClearChoice Energy  
1500 Oxford Drive, Suite 210  
Bethel Park, PA 15102  
E-Mail: [Carolyn@ClearChoice-Energy.com](mailto:Carolyn@ClearChoice-Energy.com)  
*Comperio Energy d/b/a ClearChoice Energy*

Harry S. Geller  
Julie George  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101-1414  
E-Mail: [hgellerpulp@palegalaid.net](mailto:hgellerpulp@palegalaid.net)  
E-Mail: [jgeorgepulp@palegalaid.net](mailto:jgeorgepulp@palegalaid.net)  
*Pennsylvania Communities Organizing for Change*

Christopher A. Lewis  
Christopher R. Sharp  
Blank Rome, LLP  
One Logan Square  
Philadelphia, PA 19103  
E-Mail: [Lewis@blankrome.com](mailto:Lewis@blankrome.com)  
E-Mail: [Sharp@blankrome.com](mailto:Sharp@blankrome.com)  
*Field Diagnostic Services, Inc.*  
*Constellation New Energy*

Ruben S. Brown, M.A.L.D.  
President, The E Cubed Company, LLC  
1700 York Avenue  
New York, NY 10128  
E-Mail: [ruben.brown.ecubed.llc@gmail.com](mailto:ruben.brown.ecubed.llc@gmail.com)  
*The E-Cubed Company, LLC*

Kathleen M. Greely  
Program Manager  
PA Home Energy  
Performance Systems Development  
297 ½ Chestnut Street  
Meadville, PA 16335  
E-Mail: [kgreely@psdconsulting.com](mailto:kgreely@psdconsulting.com)  
*PA Home Energy*

Steve Pincus  
Assistant General Counsel  
PJM Interconnection, LLC  
955 Jefferson Avenue  
Norristown, PA 19403  
E-mail: [pincus@pjm.com](mailto:pincus@pjm.com)  
*PJM Interconnection, LLC*

Peter J. Krajsa  
Chairman and CEO  
AFC First Financial Corporation  
Great Bear Center at Brookside  
1005 Brookside Road  
PO Box 3558  
Allentown, PA 18106  
E-Mail: [pkrajsa@afcfirst.com](mailto:pkrajsa@afcfirst.com)  
*Keystone HELP Energy Efficiency Loan and  
Rebate Program c/o AFC First Financial  
Corporation*

Scott H. DeBroff  
Alicia R. Duke  
Rhoads & Sinon LLP  
One South Market Square  
12<sup>th</sup> Floor  
PO Box 1146  
Harrisburg, PA 17108-1146  
E-Mail: [sdebroyff@rhoads-sinon.com](mailto:sdebroyff@rhoads-sinon.com)  
E-Mail: [aduke@rhoads-sinon.com](mailto:aduke@rhoads-sinon.com)  
*EnerNOC, Inc.*

Date: November 15, 2010

  
\_\_\_\_\_  
Andrew S. Tubbs