



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 #: 2507/140070

November 16, 2010

BY HAND

Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

RECEIVED  
2010 NOV 17 PM 3:33  
SECRETARY'S BUREAU

**RE: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period January 1, 2011 Through May 31, 2013 - Docket No. P-2008-2060309 (Petition of PPL Electric Utilities for Approval to Modify its Procurement of Solar Alternative Energy Credits)**

Dear Secretary Chiavetta:

On November 16, 2010, PPL Electric Utilities Corporation filed the Joint Petition for Partial Settlement ("Joint Petition") in the above-referenced proceeding. It has come to our attention that Eric J. Epstein's name was omitted from footnote 1 on page 1 of the Joint Petition. Therefore, enclosed please find an original and three (3) copies of the amended page 1 to the Joint Petition.

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

Respectfully Submitted,

Andrew S. Tubbs

AST/jl

Enclosures

cc: Honorable Susan D. Colwell  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :  
for Approval of a Default Service Program and :  
Procurement Plan for the Period January 1, : Docket No. P-2008-2060309  
2011 Through May 31, 2013 (**Petition of PPL** :  
**Electric Utilities for Approval to Modify its** :  
**Procurement of Solar Alternative Energy** :  
**Credits**) :

---

**JOINT PETITION FOR PARTIAL SETTLEMENT**

---

RECEIVED  
2010 NOV 17 PM 3:34  
SECRETARY'S BUREAU  
PA PUC

TO ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:

**I. INTRODUCTION**

PPL Electric Utilities Corporation (“PPL Electric” or “Company”), the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”), Eric J. Epstein, and the Solar Alliance (“Solar Alliance”), all parties to the above-captioned proceeding (hereinafter, collectively “Joint Petitioners”)<sup>1</sup>, hereby join in this Joint Petition for Partial Settlement (“Settlement”) and respectfully request that Administrative Law Judge Susan D. Colwell (the “ALJ”) and the Pennsylvania Public Utility Commission (“Commission”) approve this Settlement as set forth below.

As fully set forth and explained below, the Joint Petitioners have agreed to a settlement of all but one issue in the above-captioned proceeding. The reserved issue concerns whether solar aggregators under the small system set aside program should be required to certify that they have

---

<sup>1</sup> The Office of Trial Staff (“OTS”), Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc. (“Constellation”), Eric J. Epstein and the PPL Industrial Customer Alliance (“PPLICA”) have indicated that they do not object to the Settlement.

## 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 AND FIRST CLASS MAIL

Tanya J. McCloskey  
Aron J. Beatty  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[tmccloskey@paoca.org](mailto:tmccloskey@paoca.org)  
[abeatty@paoca.org](mailto:abeatty@paoca.org)

Allison Kaster  
Office of Trial Staff  
400 North Street, 2<sup>nd</sup> Floor West  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[akaster@state.pa.us](mailto:akaster@state.pa.us)

Steven C. Gray, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101  
[sgray@state.pa.us](mailto:sgray@state.pa.us)

Brian Knipe  
Buchanan Ingersol & Rooney, PC  
One South Market Square  
213 Market Street, 3<sup>rd</sup> Floor  
Harrisburg, PA 17101-2121  
[Brian.Knipe@bipc.com](mailto:Brian.Knipe@bipc.com)

Pamela C. Polacek  
Shelby A. Linton-Keddie  
McNees, Wallace & Nurick  
P.O. Box 1166  
100 Pine Street  
Harrisburg, PA 17108-1166  
[ppolacek@mwn.com](mailto:ppolacek@mwn.com)  
[skeddie@mwn.com](mailto:skeddie@mwn.com)

Craig R. Burgraff  
Todd Stewart  
Hawke, McKeon, Sniscak & Kennard, LLP  
100 N. 10<sup>th</sup> Street  
Harrisburg, PA 17101  
[crburgraff@hmslegal.com](mailto:crburgraff@hmslegal.com)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Thomas T. Niesen  
Charles E. Thomas, III  
Thomas, Long, Niesen & Kennard  
P.O. Box 9500  
212 Locust Street, Suite 500  
Harrisburg, PA 17108-9500  
[tniesen@thomaslonglaw.com](mailto:tniesen@thomaslonglaw.com)  
[cet3@thomaslonglaw.com](mailto:cet3@thomaslonglaw.com)

Charles E. Thomas, Jr.  
Jennifer M. Sultzaberger  
Thomas, Long, Niesen & Kennard  
P.O. Box 9500  
212 Locust Street, Suite 500  
Harrisburg, PA 17108-9500  
[cthomasjr@thomaslonglaw.com](mailto:cthomasjr@thomaslonglaw.com)  
[jms@thomaslonglaw.com](mailto:jms@thomaslonglaw.com)

Daniel Clearfield  
Carl R. Shultz  
Deanne O'Dell  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17108-1248  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[cshultz@eckertseamans.com](mailto:cshultz@eckertseamans.com)  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)

Eric J. Epstein  
4100 Hillsdale Road  
Harrisburg, PA 17112  
[ericepstein@comcast.net](mailto:ericepstein@comcast.net)

SECRETARY'S BUREAU  
2010 NOV 17 PM 3:33  
RECEIVED

Christopher A. Lewis  
Christopher R. Sharp  
Blank Rome LLP  
One Logan Square  
Philadelphia, PA 19103  
[Lewis@blankrome.com](mailto:Lewis@blankrome.com)  
[Sharp@blankrome.com](mailto:Sharp@blankrome.com)

Divesh Gupta  
Constellation NewEnergy Inc.  
Candler Bldg., 7<sup>th</sup> Floor  
111 Market Place  
Baltimore, MD 21202  
[divesh.gupta@Constellation.com](mailto:divesh.gupta@Constellation.com)

Craig A. Doll  
P.O. Box 403  
25 West Second Street  
Hummelstown, PA 17036  
[CDoll76342@aol.com](mailto:CDoll76342@aol.com)

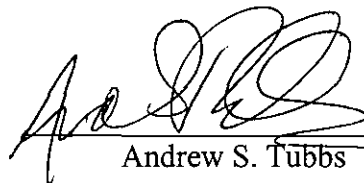
Frank Richards  
Richards Energy Group  
781 S. Chiques Road  
Manheim, PA 17545-9135  
[frichards@richardsenergy.com](mailto:frichards@richardsenergy.com)

Jesse A. Dillon  
PPL EnergyPlus LLC  
Two North Ninth Street  
Allentown, PA 18101-1179  
[jadillon@pplweb.com](mailto:jadillon@pplweb.com)

Michelle M. Skjoldal  
Pepper Hamilton LLP  
100 Market Street, Suite 200  
P.O. Box 1181  
Harrisburg, PA 17108-1181  
[skjoldalm@pepperlaw.com](mailto:skjoldalm@pepperlaw.com)

Michael A. Gruin  
Stevens & Lee  
17 North Second Street  
16th Floor  
Harrisburg, PA 17101  
[mag@stevenslee.com](mailto:mag@stevenslee.com)

Date: November 17, 2010



Andrew S. Tubbs