

Dear Ms. Chiavetta:

Enclosed are copies of replies to PPL exceptions for the case Robert Dunham v PPL Electric Utilities Corp. docket # C2010- 2155056. A hard copy on CD-ROM is enclosed. I also sent a copy to PPL's attorney.

Sincerely,  
Robert Dunham



*P.S. Copy for the Office of Special Assistants, 3rd Floor,  
included.*

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MAR 15 2011

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Reply to PPL exception regarding initial decision (C2010-2155056)

PPL asserts that I (on page 4) , Mr. Dunham, continue to receive the beneficial Rate Schedule RTS rate more than 15 years after I had my home constructed. My generation rates rose by 250% on Jan. 1, 2010. The claim is that they had no intentions at that time (as of 1995) to make substantial changes to the RTS rate, only that it would not except new homes into the program.

Mr. Oliver Kasper (PPL rates manager) testified that the RTS program was known to be unprofitable "before his time" (19 years at current position). Although it had been known for that long he admitted that PPL continued promoting this program right to the end. The RTS rate is governed by a tariff (unbeknownst to me). This tariff only guaranteed that rate for 10 years. If their rate of return was unprofitable why not discontinue it after the 10 year period for each customer? They admit "there was no intent, at that time, to discontinue the rate schedule and associated rates". Since they marketed RTS as a lifetime rate this commission would have long ago had to deal with these complaints if they were discontinued after the 10 year tariff expired. PPL was subsidizing this rate through other customers. That changed with the Lloyd vs. PA PUC in 2006, and help introduce the competitive bridge plan starting Jan. 1, 2010.

Before the initial hearing on Oct. 4, 2010, Kimberly Krupka, attorney for PPL, called me to try and reach a resolution beforehand; as is customary. During our conversation Ms. Krupka told me - "you know your current system is not very efficient". The heat pump system was not engineered to be energy efficient, but to offset the high kilowatt usage of the booster unit from peak to off-peak. It was not designed to operate without the benefit of the reduced off-peak rate. Without this feature the RTS customer now becomes the burdened class - using about 40% more kilowatts than an equivalent home using air source heat pump technology; and within a year paying the standard RS rate for all that electricity. To say that the RTS rate will always be there as long as our systems are in place but without the associated discounted off-peak rate the boosters were designed for is disingenuous.

Who can argue that PPL did not know in 1995 that the 2006 Lloyd decision would change the way RTS was billed? They claim that their advertising was not deceptive or unfair.

When you sit down with a PPL residential marketing consultant and are told this rate was for the life of the home, neglecting to inform that it is controlled by a tariff only guaranteeing it for 10 years, that the system being installed is not energy efficient and would be an albatross without the off-peak discount; this is not just deceptive advertising but fraud, which violates the meaning of section 1501 as well as the Consumer PUC Bill of Rights.

Sincerely,  
Robert Dunham



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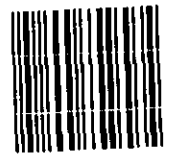
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400 North St.  
PO BOX 3265  
Harrisburg, Pa 17105-3265