

MALCOLM J. GROSS
PAUL A. MCGINLEY
HOWARD S. STEVENS
DONALD LaBARRE, JR.
J. JACKSON EATON, III
MICHAEL A. HENRY
PATRICK J. REILLY
ANNE K. MANLEY
SUSAN ELLIS WILD†
VICTOR F. CAVACINI
THOMAS E. REILLY, JR.
STUART T. SHMOOKLER
JAMES A. RITTER
ROBERT A. ALPERT
ALLEN I. TULLAR
RAYMOND J. DeRAYMOND
THOMAS A. CAPEHART
JOHN F. GROSS
KIMBERLY G. KRUPKA
KIMBERLY A. SPOTTS-KIMMEL
ANDREW H. RALSTON, JR.

GROSS 
McGINLEY
ATTORNEYS AT LAW

www.grossmcginley.com

Please reply to:
Allentown Office

Kimberly G. Krupka
kkrupka@grossmcginley.com

March 18, 2011

FEDERAL EXPRESS

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Post Office Box 3265, 400 North Street
Harrisburg, PA 17105-3265

**RE: Robert Dunham v. PPL Electric Utilities Corporation
Docket No. C-2010-2155056**

Dear Ms. Chiavetta:

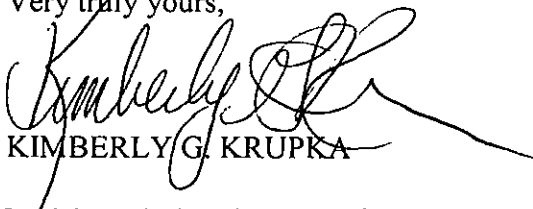
Enclosed for filing in the above-captioned matter are an original and nine (9) copies of the Replies of PPL Electric Utilities Corporation to Complainant, Robert Dunham's, Exceptions, along with the attached Certificate of Service.

Pursuant to 52 Pa. Code §1.11, the enclosed document is to be deemed filed on or before March 18, 2010.

I am also enclosing an extra copy of PPL's Replies. Please time-stamp this copy and return it to my office in the envelope provided.

Thank you for your cooperation in this matter.

Very truly yours,


KIMBERLY G. KRUPKA

KGK/jlj
Enclosures

cc: Administrative Law Judge Ember S. Jandebour (w/ encl.); *via FedEx*
Commission's Office of Special Assistants (w/ encl.); *via FedEx*
Mr. Robert Dunham (w/ encl.)
Paul E. Russell, Esquire (w/ encl); *via email only*
Ms. Kimberly A Galligani (w/ encl); *via email only*

LOREN L. SPEZIALE*
PETER J. DRUCKENMILLER, JR
MICHAEL J. BLUM * *
SAMUEL E. COHEN*
EWALDE M. COOK
ROBERT G. VIDONI*
GRAIG M. SCHULTZ*

OF COUNSEL
DAVID C. KEEHN
MICHAEL J. PIOSA

*Also admitted in NY
*Also admitted in NJ
†Also admitted in DC & MD
*Also admitted in MA

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROBERT DUNHAM,

Complainant

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2010-2155056

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**REPLIES OF PPL ELECTRIC UTILITIES CORPORATION TO
COMPLAINANT, ROBERT DUNHAM'S 'S, EXCEPTIONS**

KIMBERLY G. KRUPKA, ESQUIRE
PA I.D. NO. 83071
GROSS MCGINLEY, LLP
Attorney for PPL Electric Utilities Corporation
33 South Seventh Street
P.O. Box 4060
Allentown, PA 18105-4060
Phone: (610) 820 – 5450
Fax: (610) 820 – 6006

Date: March 18, 2011

AND NOW comes PPL Electric Utilities Corporation (“PPL”), by and through its counsel, Gross McGinley, LLP, files the following Replies to the Complainant’s Exceptions, and in support thereof, responds as follows:

1. Complainant excepted to Administrative Law Judge Jandebour’s finding that PPL did not act in a deceptive manner. Respondent, PPL, asserts it at no time acted in a deceptive manner, and the record contained no evidence to support a finding of deception.

Complainant’s argument confuses the timeline of events.¹ Due to the market factors, PPL applied to the Commission for approval, and received such approval, to close the RTS Rate class to new homes as of December 31, 1995. Accordingly, no new applicants would be eligible for the RTS Rate. Nonetheless, all existing homes (customers) would be permitted to receive their electric service pursuant to the RTS Rate. There is simply no evidence of an intent of PPL to discontinue the RTS for existing class members. Accordingly, the failure to inform persons receiving the RTS Rate that new homes would not be accepted within the class was irrelevant.

The decision to alter the delta between the RS Rate and RTS Rate was mandated years later by the Commonwealth Court’s decision in Lloyd. Based on the Court’s mandate, PPL sought approval of a revised RTS Rate tariff in order to permit compliance with the Commonwealth Court’s instruction. Nothing regarding such actions was deceptive.

¹ PPL Electric Utilities filed Exceptions on March 7, 2011, which it incorporates in full herein.

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Respectfully Submitted,

PPL Electric Utilities Corporation

By:


KIMBERLY G. KRUPKA, ESQUIRE

Dated: March 18, 2011
AT ALLENTOWN, PA

00373571

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROBERT DUNHAM,

Complainant

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2010-2155056

CERTIFICATE OF SERVICE

This is to certify that I have served the REPLIES of PPL ELECTRIC UTILITIES CORPORATION to COMPLAINANT, ROBERT DUNHAM'S, EXCEPTIONS upon counsel/complainant of record on behalf of Complainant by first class United States mail, postage on this the 18th day of March, 2011:

CHARLES M. MILLER, III
7832 MAIN STREET
FOGELSVILLE, PA 18051

and

Via Federal Express Only to:

COMMISSION'S OFFICE OF SPECIAL ASSISTANTS
3RD FLOOR
KEYSTONE BUILDING
HARRISBURG, PA 17105- 3265

ROSEMARY CHIAVETTA, SECRETARY
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET
P.O. BOX 3265
HARRISBURG PA 17105-3265

ADMINISTRATIVE LAW JUDGE EMBER S. JANDEBEUR
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265
HARRISBURG, PA 17105-3265

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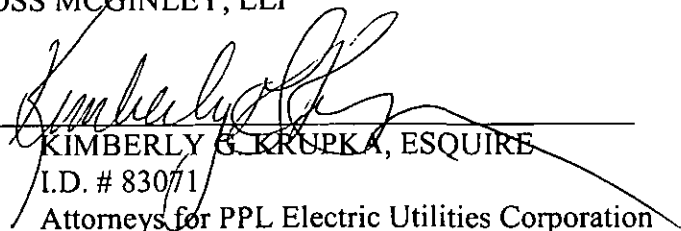
MAR 18 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

GROSS MCGINLEY, LLP

DATE: MARCH 18, 2011

BY:


KIMBERLY G. KRUPKA, ESQUIRE
I.D. # 83071

Attorneys for PPL Electric Utilities Corporation
33 South 7th Street; P.O. Box 4060
Allentown, PA 18105-4060
Phone: (610) 820-5450; Fax: (610) 820-6006

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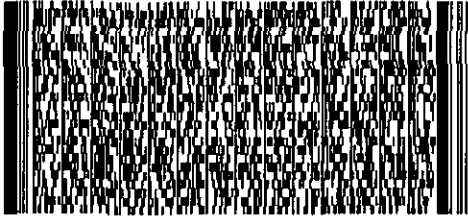
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Rosemary Chiavetta, Secretary
PENNSYLVANIA PUBLIC UTILITY COMMISS
400 NORTH ST
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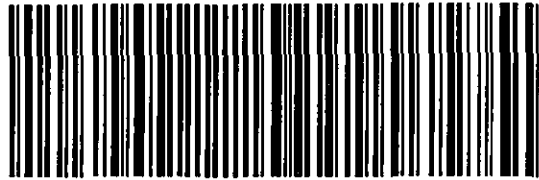
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