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June 1, 2011

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA HAND DELIVERY

**RE: PPL Electric Utilities Corp. Proposed Transmission Service Charge (TSC)
Reconciliation for the Twelve Months Ending November 30, 2010;
Docket No. M-2010-2213754**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the original and three (3) copies of the Petition to Intervene of the PP&L Industrial Customer Alliance ("PPLICA") in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document. Please date stamp the extra copy of this transmittal letter and Petition, and kindly return them to our messenger for our filing purposes.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Shelby A. Linton-Keddie

Counsel to the PP&L Industrial Customer Alliance

SLK/lmc/km

Enclosures

c: Administrative Law Judge Susan D. Colwell (via Hand Delivery and First-Class Mail)
Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corp. Proposed :
Transmission Service Charge (TSC) : Docket No. M-2010-2213754
Reconciliation for the Twelve Months Ending :
November 30, 2010 :

**PETITION TO INTERVENE OF THE
PP&L INDUSTRIAL CUSTOMER ALLIANCE**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71-5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71-5.74, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Petition to Intervene in the above-captioned proceeding. In support thereof, PPLICA avers as follows:

1. Petitioner is PPLICA, which for purposes of this proceeding includes the companies listed on Attachment "A" to this Petition. The list on Attachment "A" will be updated if necessary during this proceeding.

2. The names and address of PPLICA's attorneys are:

Pamela C. Polacek (Pa. I.D. No. 78276)
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3. On December 10, 2010, PPL Electric Utilities Corporation ("PPL" or "Company") filed with the Commission its final 2010 Transmission Service Charge ("TSC") Reconciliation Report

pursuant to the procedures set forth in PPL Electric's Tariff - Electric Pa. P.U.C. No. 201, reflecting actual data through November 30, 2010. A hearing was held on February 8, 2011, to review the TSC filing. Also on February 8, 2011, the Administrative Law Judge ("ALJ") issued a Recommended Decision, concluding: (1) that PPL's TSC reconciliation filing was an adequate filing within the meaning of Section 1307(e), subject to such further review and revision as may be found necessary by the Commission; (2) that PPL's December 2010 TSC reconciliation statement was accepted based on PPL's unaudited data and did not constitute a final approval of the accuracy of the statement or of the reasonableness of the underlying transaction; and (3) that the recovery of asserted under-collections or the refund of over-collections should be implemented based upon the operation of the automatic adjustment clauses as set forth in PPL's tariff.

4. On March 22, 2011, PPL informed Commission staff that there was an error in the December 2010 TSC reconciliation statement. Rather than using 2009 demand data to reconcile the 2010 TSC demand charges, PPL apparently used 2008 demand data instead. Based on PPL's 2010 TSC reconciliation, approximately 100 Large Commercial and Industrial ("C&I") customers who have not elected to shop experienced significant TSC under-collection reconciliation increases to their 2011 bills for 2010 service, while the residential class has received a substantial TSC reconciliation refund pursuant to rates that became effective January 1, 2011. Correction of PPL's miscalculation will substantially reduce the TSC under-collection from C&I customers while also reducing the refund to residential customers presently being paid.

5. At this point, the Commission has deferred consideration of the Recommended Decision, and has further required PPL to make additional filings in order to more accurately analyze this

issue. Upon receipt of this additional information, and without PPLICA's participation, only statutory advocates will have the ability to file comments after receipt of PPL's additional information. Although Ordering Paragraph 3 of the May 19, 2011, Order states that the "statutory advocates" will have 15 days to comment on PPL's filing, the statutory advocates were the only parties at the time the Order was issued. PPLICA respectfully submits that all interested customers that may be impacted historically or going forward should have the opportunity to comment on an issue that may have created inter-class subsidies.¹

6. PPLICA is an ad hoc association of energy-intensive commercial and industrial customers receiving electric service in PPL's service territory. PPLICA members purchase service from PPL primarily under Rate Schedules LP-4, LP-5, LP-6, IS-P, and IS-T, as well as available riders.² PPLICA members collectively consume approximately 1.74 billion kWh of electricity annually in manufacturing and other processes, and electricity costs comprise a significant portion of their production costs.

7. PPLICA members may be directly affected by the Commission's resolution of the above-captioned proceeding. As some of PPL's largest retail customers, PPLICA members have an interest in this proceeding that is not being represented by any other party of record; consequently, PPLICA satisfies the standards for intervention under Section 5.72 of the Commission's regulations. See 52 Pa. Code § 5.72.

8. While PPLICA acknowledges that, pursuant to 52 Pa. Code § 5.74(b)(4)(c), "except with regard to statutory advocates under subsection (b)(4), intervention will not be permitted once an evidentiary hearing has concluded absent extraordinary circumstances," PPLICA respectfully submits that PPL's self-reporting of a calculation error that occurred after the evidentiary hearing,

¹ PPLICA also intends to participate in the generic investigation of this topic at Docket No. M-2011-2239714.

² Some PPLICA members also have accounts on Rate Schedules GS-1 and GS-3.

combined with the Motion of Commissioner Cawley, delaying action on the ALJ's Recommended Decision and the Order that subsequently followed, which requests PPL to submit additional information for Parties to comment before the Commission renders a Final Decision satisfies the "extraordinary circumstances" standard.

WHEREFORE, the PP&L Industrial Customer Alliance respectfully requests that the Commission grant this Petition to Intervene and provide the PP&L Industrial Customer Alliance with full-party status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By


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Counsel to the PP&L Industrial Customer Alliance

Dated: June 1, 2011

ATTACHMENT "A"

PP&L INDUSTRIAL CUSTOMER ALLIANCE

Air Products and Chemicals, Inc.
Armstrong World Industries, Inc.
General Dynamics-OTS Scranton
Hercules Cement Company
High Industries, Inc.
Lafarge North America
Linde LLC
Rieter Automotive North America, Carpet
SAPA Extrusions, Inc.
The Hershey Company
TIMET North America
Wegmans Food Markets, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

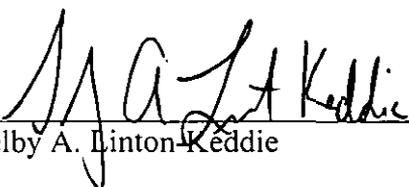
VIA E-MAIL AND FIRST-CLASS MAIL

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Shelby A. Linton-Keddie

Counsel to the PP&L Industrial Customer Alliance

Dated this 1st day of June, 2011, at Harrisburg, Pennsylvania.

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