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July 7, 2011

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

VIA HAND DELIVERY

**RE: PPL Industrial Customer Alliance v. PPL Electric Utilities;
Docket No. C-2010-2153656**


Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") are the original and three (3) copies of the Motion for Leave to Reply in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp an extra copy of this transmittal letter and the Motion, and kindly return them for our filing purposes. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 

Pamela C. Polacek
Counsel to the PP&L Industrial Customer Alliance

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PCP:cf
Enclosures

c: Administrative Law Judge David A. Salapa (via E-mail and Hand Delivery)
Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PP&L Industrial Customer Alliance :
v. : Docket No. C-2010-2153656
PPL Electric Utilities Corporation :

MOTION FOR LEAVE TO REPLY

Pursuant to Section 5.103(a) of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code § 5.103(a), the PP&L Industrial Customer Alliance ("PPLICA") hereby files a motion for leave to reply to the Answer of PPL Electric Utilities Corporation to the Petition for Leave to Withdraw Complaint in the above-captioned proceeding. In support of this Motion, PPLICA states the following:

1. On June 15, 2011, PPLICA filed a Petition for Leave to Withdraw Complaint in the above-captioned proceeding.
2. On June 29, 2011, PPL Electric Utilities Corporation ("PPL" or "Company") filed an Answer. In the Answer, PPL asserts "that PPLICA's Petition to Withdraw its Complaint should be granted, but only if the withdrawal is with prejudice against PPLICA raising, in any other proceeding, any of the issues raised by PPLICA in this proceeding." Further, PPL requests that "[s]pecifically, PPLICA should be precluded from raising any issues regarding the Company's TSC over collections in 2009 or the refund of those over collections to default service customers beginning on January 1, 2010." PPL Answer, ¶ 7.

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3. Other proceedings are actively being considered at the Commission regarding Transmission Service Charge ("TSC") reconciliations, including a proceeding specifically addressing PPL's reconciliations¹ and a generic investigation addressing TSC reconciliations.²

4. PPLICA respectfully requests leave to reply to PPL's Answer to address the interrelation between PPL's requested relief, the issues underlying PPLICA's Complaint at this docket that it is willing to agree it will not pursue further if the withdrawal is granted, and PPLICA's participation in other TSC dockets.

5. Because the ALJ's ruling on this issue could impact PPLICA's rights in other ongoing proceedings, PPLICA could be substantially prejudiced if the ALJ rules without consideration of a reply by PPLICA.

6. PPL's request for the withdrawal the Complaint to be with prejudice and its assertion that this should prohibit PPLICA from addressing any issues regarding the 2009 reconciliation or the TSC over collection balance as of December 1, 2010, arguably constitutes a request for affirmative relief or new matter that may entitle PPLICA to a reply as of right under Section 5.63 of the Commission's regulations, 52 Pa. Code § 5.63. PPLICA submits this Motion for Leave to Reply to confirm its ability to submit a response pursuant to Section 5.63 or pursuant to permission by the presiding ALJ.

7. PPLICA can prepare and submit the reply within ten (10) days of a ruling on this Motion.

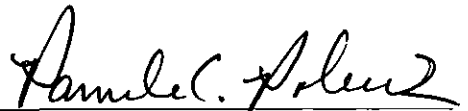
¹ See *PPL Electric Utilities Corp. Proposed Transmission Service Charge (TSC) Reconciliation for the Twelve Months Ending November 30, 2010*, Docket No. M-2010-2213754 (May 19, 2011).

² *Investigation re TSC Reconciliation Methods*, Docket No. M-2011-2239714 (May 19, 2011).

WHEREFORE, for the foregoing reasons, the PP&L Industrial Customer Alliance respectfully requests that it be granted leave to file a reply to the PPL Answer.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 
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Counsel to PP&L Industrial Customer Alliance

Dated: July 7, 2011

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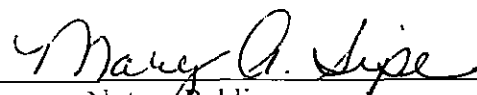
COMMONWEALTH OF PENNSYLVANIA)
)
 COUNTY OF DAUPHIN) ss:

Pamela C. Polacek, being duly sworn according to law, deposes and says that she is counsel to PP&L Industrial Customer Alliance, and that in this capacity she is authorized to and does make this affidavit for them, and that the facts set forth in the foregoing Motion for Leave to Reply are true and correct to the best of her knowledge, information, and belief.



 Pamela C. Polacek

SWORN TO and subscribed
 Before me this 7th day
 of July, 2011.



 Notary Public

COMMONWEALTH OF PENNSYLVANIA
 Notarial Seal
 Mary A. Sipe, Notary Public
 City of Harrisburg, Dauphin County
 My Commission Expires March 19, 2013

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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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Pamela C. Polacek
Counsel to the PP&L Industrial Customer Alliance

Dated this 7th day of July, 2011, at Harrisburg, Pennsylvania.

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