

COMMONWEALTH OF PENNSYLVANIA



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William R. Lloyd, Jr.
Small Business Advocate

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August 18, 2011

Hand Delivery

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

RECEIVED

AUG 18 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Petition of PPL Electric Utilities Corporation for Approval to Implement a Reconciliation Rider for Default Supply Service
Docket No. P-2011-2256365**

Dear Secretary Chiavetta:

I am delivering for filing today the original plus three copies of the Notice of Intervention, Answer, Verification, Public Statement and Notice of Appearance, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding.

Two copies have been served today on all known parties in this proceeding. A Certificate of Service to that effect is enclosed.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Rose Triscari".

Elizabeth Rose Triscari
Assistant Small Business Advocate
Attorney ID No. 306921

Enclosures

cc: Parties of Record
Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PPL ELECTRIC UTILITIES :
CORPORATION FOR APPROVAL TO :
IMPLEMENT A RECONCILIATION RIDER : DOCKET NO. P-2011-2256365
FOR DEFAULT SUPPLY SERVICE :**

**ANSWER OF THE OFFICE OF SMALL BUSINESS ADVOCATE TO
PPL ELECTRIC UTILITIES CORPORATION'S PETITION FOR APPROVAL TO
IMPLEMENT A RECONCILIATION RIDER FOR DEFAULT SUPPLY SERVICE**

Pursuant to 52 Pa. Code §5.61(e), the Office of Small Business Advocate ("OSBA") hereby answers the Petition filed by PPL Electric Utilities Corporation's ("PPL" or the "Company") with the Pennsylvania Public Utility Commission ("Commission") on August 3, 2011, and avers the following in support thereof:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission. Concurrent with the filing of this Answer, the OSBA is filing a Notice of Intervention and Public Statement in connection with the above-captioned proceeding to protect the interest of PPL's small business customers.

2. In the Petition, PPL proposes to implement a reconciliation rider related to transmission service and generation supply service. Pursuant to that rider, the Company would refund overcollections to and recoup undercollections from customers who were default service customers when the overcollection or undercollection occurred.

3. PPL's current tariffs reconcile such overcollections and undercollections by way of a transmission service charge ("TSC") and two generation supply charges, the Generation Supply Charge-1 ("GSC-1") for residential and small commercial and industrial customers ("Small C&I") and the Generation Supply Charge-2 ("GSC-2") for large commercial and industrial customers ("Large C&I").

4. At this time, there are two Commission proceedings pending with respect to these charges.

a. The first is in regard to the TSC. By Order entered May 19, 2011, at Docket No. M-2010-2213754, the Commission raised questions about the method PPL should use to reconcile past period overcollections and undercollections in its TSC ("TSC Order"). On June 3, 2011, PPL filed a response to the Commission's information requests ("PPL Information Requests"). In Ordering Paragraph No. 3 of the TSC Order, the Commission invited comments from the statutory advocates in response to the PPL Information Requests. The OSBA submitted comments in response to that invitation on June 20, 2011. To date, the Commission has not acted or issued a decision in connection with the TSC proceeding.

b. The second pending Commission proceeding concerns the GSC-1. On May 20, 2011, PPL filed the proposed GSC-1 for the application period June 1, 2011, through August 31, 2011 at Docket No. M-2011-2243137. On May 31, 2011, the OSBA filed a Complaint against the the proposed GSC-1. PPL timely answered the OSBA's Complaint. Thereafter, the case was assigned to Administrative Law Judge ("ALJ")

Susan J. Colwell. The parties having already filed direct and rebuttal testimony.

Surrebuttal testimony is due on September 2, 2011.

5. The reconciliation rider proposed by PPL in the Petition is purely prospective. If approved by the Commission, it will not become effective until June 1, 2012. Therefore, the proposed rider is irrelevant to the disposition of the aforementioned TSC and GSC-1 proceedings.

6. At this time, the OSBA takes no position on the merits of PPL's proposed reconciliation rider. The OSBA reserves the right to comment on the reconciliation rider after PPL has filed its testimony and the OSBA has had the opportunity to engage in discovery.

WHEREFORE, the Office of Small Business Advocate respectfully requests the Commission to direct the Office of Administrative Law Judge to hold hearings on PPL's proposed reconciliation rider and prepare a Recommended Decision.

Respectfully submitted,



Elizabeth Rose Triscari
Attorney ID No. 306921
Assistant Small Business Advocate

For:

William R. Lloyd, Jr.
Attorney ID No. 16452
Small Business Advocate

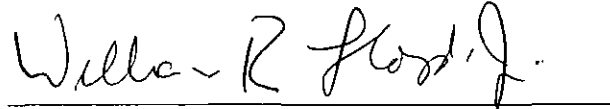
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Date: August 18, 2011

VERIFICATION

I, William R. Lloyd, Jr., hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

Date: August 18, 2011



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval to Implement : **DOCKET NO. P-2011-2256365**
a Reconciliation Rider for Default :
Supply Service :

CERTIFICATE OF SERVICE

I certify that I am serving two copies of the Notice of Intervention, Answer, Verification, Public Statement and Notice of Appearance, on behalf of the Office of Small Business Advocate, by e-mail and first-class mail (unless otherwise noted) upon the persons addressed below:

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Date: August 18, 2011


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