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October 18, 2011

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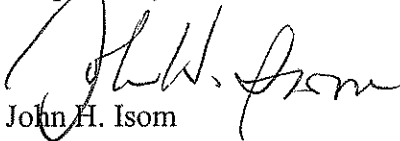
RE: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-2010-2161694, et al.

Dear Secretary Chiavetta:

Enclosed for filing is the Reply Brief of PPL Electric Utilities Corporation on Remand in the above-referenced proceeding.

Copies have been provided to the persons in the manner indicated on the certificate of service.

Respectfully Submitted,



John H. Isom

JHI/jl

Enclosures

cc: Honorable Susan D. Colwell
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing **Reply Brief** has been provided to the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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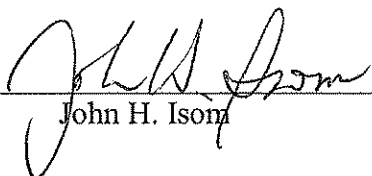
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I. INTRODUCTION

On October 6, 2011, the Bureau of Investigation and Enforcement (“I&E”), the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the PP&L Industrial Customer Alliance (“PPLICA”) and PPL Electric Utilities Corporation (“PPL Electric”) filed Main or Initial Briefs in the above-captioned remand proceeding. PPL Electric’s Initial Brief explained its positions on the issues remaining in this remand proceeding, anticipated and responded to many of the arguments that have been raised by other parties. In some instances, PPL Electric’s position is fully set forth in its Initial Brief, and further response is not necessary. Certain arguments of other parties, however, require further response, which is set forth below.

II. SUMMARY OF ARGUMENT

In its Main Brief, PPLICA asserts that the Pennsylvania Public Utility Commission's ("Commission") reconsideration and remand order decided that Donsco is entitled to a special rate and that the only issues to be addressed on remand are the amount and form of rate relief for Donsco. PPLICA's position is devoid of merit and inconsistent with the plain language of the Commission's Reconsideration Order, the identification of the issues on remand by the ALJ at the prehearing conference, PPLICA's failure to object to substantial evidence adduced by PPL Electric and the OSBA, and the production by PPLICA itself of substantial evidence on the very issues which it claims already have been resolved.

PPLICA's argument should be recognized for what it is — an attempt to avoid the fact that its evidence in support of a special rate has been thoroughly and completely rebutted by PPL Electric and the OSBA. PPLICA asserts that Donsco should receive rate relief because it is "unique" and has "special needs." As explained by PPL Electric in its Initial Brief, pp. 12-24, Donsco is not unique in any meaningful way. Instead of rebutting PPL Electric's evidence, PPLICA seeks to avoid the consequences of its failure of proof by unilaterally declaring victory. Such a victory, however, is nowhere to be found in the Commission's Reconsideration Order.

In its Petition for Reconsideration, PPLICA also claimed that it "vigorously" and "comprehensively" explored the possibility that Donsco could receive 69 kV service from PPL Electric under Rate Schedule LP-5, a rate schedule with lower rates for customers receiving service at transmission voltages of 69 kV or higher. PPLICA asserted that it could receive service at PPL Electric's substation on the east side of the Susquehanna River and move it across the River to the west side, where its foundry is located, using conductors attached to PennDOT's Route 30 Bridge. PPLICA's claims are without basis. In fact, PPLICA did little before the Petition for Reconsideration to investigate this service option, and it did nothing after the

Commission's Reconsideration Order. PPLICA knew when it filed the Petition for Reconsideration that the "bridge crossing" alternative was not viable. PennDOT would not allow new, additional conductors to be attached to the bridge, and PPL Electric would not sell or lease existing conductors to Donsco, because they are needed to provide adequate and reliable service to 5,000 other customers on the west side of the Susquehanna River.

Finally, PPLICA contends that, if the Commission rejects its proposed rate relief for Donsco, it should adopt a modified version of an alternative initially proposed by PPL Electric. It is correct that PPL Electric offered an alternative rate design for Rate Schedule LP-4 which would benefit Donsco, if the Commission were to find that, contrary to compelling evidence, Donsco should receive some rate relief. The principal feature of the alternative rate design was a 10,000 kW billing cap on customer demand with the resulting revenue shortfall recovered from other Rate Schedule LP-4 customers through an increase in the customer charge. As the OSBA pointed out, however, PPL Electric's alternative rate design should not be adopted because: (1) it is not based on the cost-of-service methodology approved by the Commission in this proceeding (a methodology supported by PPLICA), (2) it would increase subsidies that Donsco is enjoying at present rates at the expense of other customers under Rate Schedule LP-4, and (3) if Donsco were to increase its billing demand, the result would be an increase in the level of revenue requirement allocated to Rate Schedule LP-4 without any increase in the charges to Donsco, all to the further detriment of other Rate Schedule LP-4 customers. PPLICA's proposed further modifications would make the alternative rate design even worse. PPLICA would reduce the demand billing cap to 6,000 kW for the sole purpose of making its costs under the PPL Electric alternative proposal similar to its own proposal. Such a reduction, however, would increase present subsidies favoring Donsco and permit additional customers to benefit from the

reduced demand billing cap, thereby further increasing the resulting revenue shortfall to be recovered from other customers under Rate Schedule LP-4. In short, the record does not support the adoption of PPLICA's alternative rate design for Rate Schedule LP-4.

III. ARGUMENT

A. **PPLICA’S ARGUMENT, THAT THE COMMISSION ALREADY HAS DETERMINED THAT DONSCO IS ENTITLED TO A SPECIAL RATE, IS WITHOUT MERIT.**

PPLICA argues that the Commission already determined in its Opinion and Order granting PPLICA’s Petition for Reconsideration, that Donsco is entitled to a special rate, and the only purpose of this remand proceeding is to determine the amount and form of the rate reduction. PPLICA M.B., pp. 8-10. As explained below, however, PPLICA’s contention is without merit as demonstrated by the language of the Commission’s Reconsideration Order, the ALJ’s determination of the scope of the remand proceeding at the Prehearing Conference, by PPLICA’s own evidence, and by the failure of PPLICA to object to evidence adduced by PPL Electric and OSBA which demonstrates that Donsco’s circumstances are not unique, that Donsco has no “special needs” and that Donsco is not entitled to a special rate. Instead, PPLICA’s contention is nothing more than its latest attempt to reargue its principal contention that Donsco is entitled to a special rate because it is “unique” and has “special needs.”

PPLICA’s contention that the Commission already has determined that Donsco is entitled to a special rate arises from PPLICA’s observation that the Commission requested the parties to address four specific issues. Reconsideration Order, pp. 12-13. PPLICA is correct that the Commission asked the parties to address these four particular issues. The Reconsideration Order, however, did not limit the scope of the remand proceeding to these four issues and, in fact, asked that:

“We emphasize that the Parties should build the most complete evidentiary record possible. This will foster a thorough review by the presiding officer in her recommended decision on remand and facilitate the Commission’s ultimate review, in the event exceptions to the ALJ’s decision are filed.”

Remand Order, p. 14. Donsco's attempt to silence discussion of the issue of whether it should receive a special rate is directly contrary to the above directive from the Commission.

That the Commission intended the remand proceeding to address the issue of **whether** Donsco should receive a special rate was made most clear in the following passage:

“As described above, Donsco is somewhat unique in its circumstances. Given the evidence of Donsco's market distribution rate increases, we find that PPLICCA has demonstrated reasonable arguments for this Commission to consider the rate relief requested. Our remand will supply crucial information to make a decision that is well-informed and addresses not only the **potential** relief for Donsco, but the impact on other PPL customers that must be considered.”

Reconsideration Order, p. 13 (emphasis added). By referring to the “potential” rate relief for Donsco and by agreeing to “consider” the rate relief requested by Donsco, the Commission clearly indicated that the issue of whether Donsco should receive a special rate was still unresolved.

Further, the ALJ made it perfectly clear at the Prehearing Conference that the issue of whether Donsco should receive rate relief was still in play. Specifically, the ALJ stated that PPL Electric's Prehearing Memorandum spells out all of the remand issues “fairly well and can provide a nice guide for the rest of you.” Tr. 510. The ALJ was referring to the following passage of PPL Electric's Prehearing Conference Memorandum, pp. 5-6, which summarize the issues as follows:

“Pursuant to the Commission's Opinion and Order, dated April 27, 2011, the following issues have been remanded for further development of a more complete record proceedings and the issuance of a Recommended Decision:

- (a) Whether a special rate should be created for Donsco, Inc. (“Donsco”)?
- (b) If so, what rate options should be available?

- (c) If so, what would the effective date be for any such rate options.
- (d) What would be the potential rate impacts of such a rate on other PPL Electric customers?
- (e) What costs does PPL Electric incur in serving Donsco, including annual operation and maintenance (O&M) costs of the 12 kV lines from the North Columbia substation to the Donsco facility, including the 69-12kV transformer?
- (f) Has Donsco paid for any of the rate base used to serve it and, if so, how much?
- (g) Will PennDOT authorize Donsco to occupy state highways and bridges as a non-utility?
- (h) Whether Donsco's successful implementation of a plan utilizing PennDOT approvals to qualify for 69 kV service under PPL Electric's Rate Schedule LP-5 would render its request for a special LP-4 SI rate schedule moot?"

PPLICA voiced no objection to the statement of issues.

Further, as PPLICA acknowledges, PPLICA M.B., pp. 8-9, PPL Electric and OSBA presented substantial evidence on remand that Donsco is not "unique" in any way that justifies a special rate for it and that Donsco has no "special needs." *See, e.g.*, PPL Electric St. No. 8-RM, pp. 1-14; PPL Electric St. No. 8-RSR, pp. 1-8; OSBA St. No. 4, pp. 5-10. PPLICA raised no objection to the admission of such testimony into evidence. Tr. 585, 596. Any argument as to the scope of the remand proceeding, therefore, clearly has been waived.

PPLICA's argument also is completely inconsistent with the fact that PPLICA itself presented lengthy evidence on remand addressing the issue of whether Donsco is entitled to a special rate. *See, e.g.*, PPLICA Remand St. No. 2, pp. 8-9, 11-12; PPL Remand St. No. 1-R, pp. 1-6; PPLICA Remand St. No. 2-R, pp. 2, 4, 9-10. PPLICA obviously believed that the question of whether Donsco should qualify for a special, discounted rate was pending before the ALJ and

the Commission. Donsco cannot have it both ways – it cannot in the same remand proceeding produce evidence on a particular issue and then contend that the issue it addressed in its own evidence is not pending before the ALJ and the Commission.

PPLICA’s contention, that the Commission already has decided that Donsco should receive a special rate, should be seen for what it is – an attempt to distract the ALJ, the Commission and the other parties from the fundamental issue of whether Donsco qualifies for a special rate because it is “unique” or has some “special need.” Despite PPLICA’s protestations, other parties have demonstrated beyond all reasonable doubt that Donsco is not “unique” in any special way that qualifies it for a special, discounted rate and that Donsco has no “special needs.” PPL Electric I.B., pp. 12-25, 32-34; OSBA M.B., pp. 7-15. PPLICA’s contentions are not credible and should be rejected by the ALJ and the Commission.

B. CONTRARY TO PPLICA’S CONTENTIONS, SERVICE TO DONSCO UNDER RATE SCHEDULE LP-5 AT 69 KV BY OCCUPYING THE ROUTE 30 BRIDGE WAS NEVER A VIABLE OPTION.

PPLICA states that Donsco “vigorously” investigated the requirements to obtain rights-of-way and bridge crossing permits from Pennsylvania Department of Transportation (“PennDOT”). PPLICA M.B., p. 27. The purpose of the “investigation” was to determine whether Donsco could receive 69 kV service near the North Columbia 69-30 kV Substation on the east side of the Susquehanna River, transform the electricity to 12 kV at or near the North Columbia Substation, and move the electricity to the west side of the Susquehanna River using conductors attached to PennDOT’s Route 30 Bridge to the west side of the Susquehanna River, where Donsco’s Wrightsville Foundry is located. Contrary to PPLICA’s statement, and contrary to the Commission’s directive at page 13 the Reconsideration Order, PPLICA did almost nothing to pursue the possibility of receiving 69 kV service near the North Columbia Substation because it knew that such a service option was not viable.

It is important to note that the “bridge crossing” alternative was a substantial basis for PPLICA’s request for the Commission to reconsider its earlier decision to deny Donsco a special rate. PPLICA Petition for Reconsideration, pp. 18-20, ¶¶ 30-32. *See also* the Reconsideration Order, pp. 8-9, 13; Scheduling Order, p. 3 (May 16, 2011). Contrary to PPLICA’s contentions, the “bridge crossing” alternative under which Donsco would receive service under Rate Schedule LP-5 at 69 kV was never viable, and PPLICA and Donsco knew it was not viable when they filed the Petition for Reconsideration. This conclusion is inescapable based on PPLICA’s and Donsco’s filings and evidence.

In Donsco’s initial testimony regarding alternatives for receiving service under Rate Schedule LP-5, PPLICA stated:

“Because PennDOT will not allow us to run the line along the existing bridge, this new line would need to be a stand-alone project.”

PPLICA St. No. 1, p. 10; PPLICA Petition for Reconsideration, p. 13; ¶ 22 (Jan. 5, 2011). Thus, PPLICA knew that PennDOT would not permit additional conductors to be attached to the Route 30 Bridge across the Susquehanna River. Therefore, the project could be viable only if PPL Electric were willing to sell or lease existing facilities attached to PennDOT’s Route 30 Bridge to Donsco.

PPLICA also knew, when it filed the Petition for Reconsideration, that PPL Electric would not lease or sell the 12 kV lines from the North Columbia substation across the Route 30 Bridge that are normally used to serve Donsco to Donsco. PPLICA stated:

“PPL Electric indicated that it would not lease or sell the equipment to us because it would limit future expansion and present possible reliability issues.”

PPLICA St. No. 1, pp. 11-12; PPLICA Petition for Reconsideration, p. 19 ¶ 31 (Jan. 5, 2011). That Donsco and PPLICA knew that PPL Electric would not sell or lease facilities across the

Route 30 Bridge to Donsco prior to the filing of PPLICA's Petition for Reconsideration was confirmed during cross-examination:

- “Q. When was the first time that PPL Electric indicated firmly that it would decline to sell or lease the facilities to Donsco?
- A. I recall that it would have been somewhere in the Summer of 2010, whenever Donsco's counsel checked into the issue and actually was looking at the regulations and took that proposal back to PPL.
- Q. So am I correct then that Donsco knew in the Summer of 2010 that PPL Electric would decline to sell or lease the facilities across the river and to the Donsco plant to Donsco?
- A. Yes.”

Tr. 541. Thus, when PPLICA filed its Petition for Reconsideration, it knew that PennDOT would not allow additional conductors to be attached to the Route 30 Bridge across the Susquehanna River, and it knew that PPL Electric would not sell to Donsco the facilities normally used to serve Donsco. The alternative cited by Donsco of receiving service under Rate Schedule LP-5 at 69 kV near the North Columbia substation and moving electricity across the Susquehanna River on the Route 30 Bridge was not viable.

PPLICA's knowledge that its “bridge crossing” alternative was not viable is confirmed by its conduct. Despite the prominence of this alternative method of service in PPLICA's Petition for Reconsideration, PPLICA did almost nothing to pursue it. Based on information provided in response to discovery requests and during cross-examination, all PPLICA did to pursue this alternative was to have one of its attorneys contact an Assistant General Counsel at PennDOT on December 29, 2010 and copy the applicable PennDOT regulations to which the Assistant General Counsel referred. PPL Electric St. No. 8-RM, p. 16; PPL Electric Exhibit OGK-5, responses to Interrogatories of PPL Electric Set I, Nos. 1 through 7. PPLICA confirmed that all of the research and work in evaluating the “bridge crossing” alternative was set forth

fully in these answers to interrogatories. Tr. 547-48. Clearly, nothing was done after December 29, 2010. Despite PPLICA's statements that it "comprehensively" and "vigorously" investigated the "bridge crossing" alternative (PPLICA M.B., p. 27), the record in this proceeding demonstrates otherwise.

PPL Electric, in contrast, conducted a thorough review of the issues that would have to be addressed and resolved in order for PPLICA's "bridge crossing" alternative to be implemented. PPL Electric determined that two transformers at the North Columbia substation and all four circuits that cross the Susquehanna River on the Route 30 Bridge can be used to serve Donsco and other customers on the west side of the Susquehanna River. Therefore, both transformers and all four circuits are important to PPL Electric's ability to provide reliable service to customers on the west side of the Susquehanna River.

In fact, recently, facilities normally used to serve Donsco played a critical role in restoring service to other customers on the west side of the Susquehanna River. During July, 2010, facilities normally used to serve Donsco were used to serve other customers on the west side of the Susquehanna River as a result of a transformer failure and resulting fire at the North Columbia Substation. As a result of the availability of the facilities normally used to serve Donsco, approximately 5,000 customers experienced an outage of only approximately one hour, instead of an outage lasting three days. PPL Electric St. No. 16-RM, pp. 4-7. Thus, recent events have confirmed that facilities normally used to serve Donsco are critical to PPL Electric's ability to provide adequate and reliable service to other customers on the west side of the Susquehanna River.

PPL Electric also investigated and evaluated other issues that would have to be addressed and resolved in order for PPL Electric to serve Donsco using the “bridge crossing” alternative.

These other issues include the following:

1. Certain conductors and other facilities normally used to serve Donsco are located at least in part on private property. In order for Donsco to acquire ownership of these facilities, it would have to obtain appropriate rights-of-way from affected property owners. The acquisition of necessary land rights would be more challenging for Donsco because it does not have the power of eminent domain. PPL Electric St. No. 16-RM, p. 7.
2. Many of PPL Electric’s conductors and related facilities are located in public rights-of-way for roads and highways. If Donsco were to purchase or lease PPL Electric’s conductors, it would have to obtain necessary road occupancy permits from each political subdivision. The willingness of such political subdivisions to grant necessary permits is unknown. PPL Electric No. 16-RM, p. 8.
3. Regarding the Route 30 Bridge occupancy, PPLICA only determined that PennDOT would “consider” a bridge occupancy permit application from Donsco. There is no assurance that an application for such a permit would be approved. PPL Electric St. No. 16-RM, p. 8.
4. If PPL Electric were to sell or lease conductors to Donsco, the facilities would no longer meet applicable safety code

requirements. In order to meet such requirements, most, and perhaps all, of the poles used to support the conductors would have to be replaced with higher poles. Approximately 65 poles would be involved. Donsco would bear the cost of replacing the poles. PPL Electric St. No. 16-RM, pp. 9, 12.

5. The existing poles are occupied not only by facilities of PPL Electric but also by communications facilities of others including Verizon, Frontier Communications and Comcast. These entities would have to remove their facilities from existing poles and attach them to taller, replacement poles. Donsco would bear the costs of moving the communications facilities. PPL Electric St. No. 16-RM, pp. 9-13.
6. In addition, like other entities attaching facilities to PPL Electric's poles, Donsco would be required to pay annual fees in order to attach to PPL Electric's poles. Annual fees would be approximately \$115 per pole, and approximately 65 poles would be involved. PPL Electric St. No. 16-RM, pp. 12-13.

All of these changes would necessitate substantial expenditures, and Donsco would be required to bear all of the costs arising from the "bridge crossing" option. In short, PPLICA's "bridge crossing" alternative is not, and never was, practical. PPL Electric St. No. 16-RM, p. 7.

C. PPL ELECTRIC'S ALTERNATIVE RATE DESIGN FOR RATE SCHEDULE LP-4 WAS EFFECTIVELY REBUTTED BY THE OSBA.

PPL Electric proposed an alternative rate design for Rate Schedule LP-4 under which Donsco would receive some rate relief, for the Commission's consideration in the event that the

Commission were to determine, despite compelling evidence to the contrary, that Donsco should receive such rate relief. PPL Electric St. No. 8-RM, pp. 16-19. PPL Electric never supported the adoption of this approach and presented it solely as a guide to the Commission if the Commission were to determine (erroneously in PPL Electric's view) that Donsco was entitled to special rate relief. Moreover, upon further review, and particularly upon review of OSBA's criticisms of PPL Electric's alternative rate design for Rate Schedule LP-4, PPL Electric has concluded that its proposed alternative rate design for Rate Schedule LP-4 is not consistent with sound ratemaking principles. PPL Electric, therefore, did not present this alternative in its Initial Brief and does not support its adoption in this proceeding. OSBA's criticisms are set forth at OSBA Main Brief, pp. 24-27 and OSBA St. No. 5, pp. 2-6. OSBA's criticisms are summarized below. First, however, PPL Electric will summarize its alternative rate design.

PPL Electric's alternative rate design for Rate Schedule LP-4 would cap the billing demand at 10,000 kW; all kW in excess of 10,000 would be priced at \$0. Presently, Donsco is the only Rate Schedule LP-4 customer with a billing demand in excess of 10,000 kW. PPL Electric would recover the revenue shortfall resulting from the 10,000 kW demand billing cap from other customers under Rate Schedule LP-4 through an increase in the customer charge from \$160.98 per month to \$176.87 per month. The demand charge would remain unchanged. This alternative was grounded in a cost-of-service study based in part on direct assignment to Donsco of revenue requirement incurred by PPL Electric in serving Donsco.

OSBA correctly has identified several problems with this proposal. First, the cost-of-service study prepared by PPL Electric in support of its alternative rate design for Rate Schedule LP-4 is not consistent with the cost-of-service study methodology approved by the Commission in its Opinion and Order entered on December 21, 2010. Under the Commission-approved

methodology, substations and primary distribution system plant are classified into customer and demand components, and then allocated among rate classes in proportion to customer count and non-coincident peak demands. OSBA St. No. 5, p. 5. Significantly, PPLICA supported the cost-of-service study methodology approved by the Commission. PPLICA Main Brief, pp. 10-12 (Sept. 2, 2010).

As OSBA correctly noted, when a cost-of-service study evaluating the cost of serving Donsco is prepared in a manner consistent with the methodology approved by the Commission in this proceeding, the result is that Donsco contributes at present rates¹ an overall rate of return of 11.9 percent, which is less than the average contribution of the Rate Schedule LP-4 rate class as a whole of 13.4 percent. That is, at present rates, Donsco already is receiving a subsidy from other Rate Schedule LP-4 customers. Any further rate reduction for Donsco would only increase the subsidy. Based on the cost-of-service study methodology approved by the Commission in this proceeding, there is no cost basis for reducing rates to customers with billing demands above 10,000 kW. OSBA St. No. 5, p. 5.

Further, under the Commission's approved cost-of-service study methodology, demand-related costs allocated to Rate Schedule LP-4 will increase as demand increases. However, under the demand billing cap of 10,000 kW proposed by PPL Electric for the alternative rate design for Rate Schedule LP-4, there would be no increase in cost to Donsco if its demand were to increase. Therefore, load growth by Donsco would cause more costs to be allocated to the Rate Schedule LP-4 rate class, but such costs would not be paid by Donsco. Instead, such costs would be absorbed by other Rate Schedule LP-4 customers further exacerbating the inequities arising under the alternative rate design for Rate Schedule LP-4. OSBA St. No. 5, p. 6.

¹ In this context, "present rates" refers to rates in the compliance filing that currently are being charged to customers.

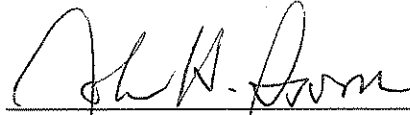
Moreover, PPL Electric's proposed alternative rate design for Rate Schedule LP-4 suffers from some of the same shortcomings as does PPLICA's proposed rate for Donsco. Specifically, establishing rates for individual or small groups of customers is not proper ratemaking policy, as explained by PPL Electric in its Initial Brief at pp. 12-14. As explained there, such practices can lead to rate instability because old substantially depreciated facilities are replaced by new, undepreciated facilities and because such practices effectively can undermine class ratemaking and lead to discriminatory rates.

PPLICA has stated that, if the Commission rejects its principal proposal, it should approve the alternative rate design for Rate Schedule LP-4, with one major modification. That modification would be to reduce the demand billing cap from 10,000 kW to 6,000 kW. PPLICA Main Brief, pp. 23-24. The demand billing rate cap reduction proposed by PPLICA serves only one purpose — to reduce Donsco's monthly bill for electric distribution services to approximately the level in PPLICA's principal proposal. Such a reduction, however, exacerbates all of the problems with PPL Electric's alternative rate design for Rate Schedule LP-4 explained above. In addition, it would increase significantly the revenue requirement burden shifted to other, smaller Rate Schedule LP-4 customers. It would increase the revenue shortfall from Donsco, and it would allow other customers in addition to Donsco to receive rate reductions by qualifying for the rate, thereby further increasing the revenue shortfall from the rate design. Therefore, PPLICA's proposed modification would increase the amount of the revenue requirement shifted to smaller Rate Schedule LP-4 customers.

IV. CONCLUSION

WHEREFORE, for all the foregoing reasons and the reasons set forth in its Initial Brief, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission's Opinion and Order in this proceeding, entered on December 21, 2010, be affirmed and the Petition of the PP&L Industrial Customer Alliance for a special rate for Donsco, Inc. be denied.

Respectfully submitted,



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Date: October 18, 2011

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