

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Consumer Advocate

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October 18, 2011

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

RE: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Generation Supply Charge-1
Docket No. M-20112258733

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Petition to Withdraw Complaint, in the above-referenced proceeding.

Copies have been served as indicated on the Certificate of Service.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Aron J. Beatty'.

Aron J. Beatty
Assistant Consumer Advocate
PA Attorney I.D. # 86625

Enclosures

cc: Administrative Law Judge
Office of Special Assistants

149746

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:		
	:		
v.	:	Docket No.	M-2011-2258733
	:		C-2011-2259375
	:		
PPL Electric Utilities Corporation	:		

**OFFICE OF CONSUMER ADVOCATE
PETITION FOR LEAVE TO WITHDRAW COMPLAINT**

Pursuant to the provisions of Section 5.94(a) of the Pennsylvania Public Utility Commission's Regulations, 52 Pa. Code § 5.94(a), the Office of Consumer Advocate (OCA) hereby petitions for leave to withdraw its Complaint against PPL Electric Utilities Corporation (PPL or Company) at the above-captioned docket.

1. On August 22, 2011, PPL made a filing in which it updated its Generation Supply Charge-1 (GSC-1) rates for the September 1, 2011 through November 30, 2011 Application Period. In its filing, the Company indicated a very large increase in Time of Use (TOU) rates for residential customers. Under the proposed update to GSC-1, residential customers taking TOU service would have paid between 28 and 33 cents per kWh for off peak and on peak generation service. By way of comparison, PPL's fixed generation rate for residential RS customers during the Application Period was 7.6 cents per kWh.
2. On August 25, 2011, the OCA filed a Formal Complaint with regard to the Company's August 22, 2011 filing docketed at C-2011-2259375. The OCA averred that the magnitude of the TOU rate increases may be unjust and unreasonable.
3. By Order entered August 25, 2011, the Commission suspended the operation of PPL's August 22 filing with regard to TOU rates. The Commission ordered the Company to maintain its existing TOU rates through March 1, 2011. In addition, the Commission Ordered PPL to file a modified TOU program to address the TOU rate issues identified in the August 22 filing within 30 days of entry of its August 25 Order.

4. On September 26, 2011, PPL filed a new TOU program for its residential customer classes at Docket No. R-2011-2264771.
5. On October 18, 2011, the OCA filed a Complaint in the TOU filing made at Docket No. R-2011-2264771.
6. The OCA submits that the initial concerns raised in its August 25 Complaint at Docket No. C-2011-2259375 were addressed by the Commission when it ordered that PPL's proposed TOU rates be suspended and that the existing TOU rates continue in effect through March 1, 2011. The Company's September 26, 2011 filing contains a new TOU program that attempts to address areas of concern in the existing TOU plan. The OCA will conduct a full evaluation of PPL's TOU program modifications in the proceeding at Docket No. R-2011-2264771. The OCA submits that the issues concerning the continuing operation of PPL's TOU program raised in the OCA's complaint at Docket No. C-2011-2259375 are more appropriately addressed in that proceeding.

WHEREFORE, for the foregoing reasons, the Pennsylvania Office of Consumer Advocate respectfully requests that it be granted leave to withdraw the Complaint that was filed on August 25, 2011.

Respectfully Submitted,



Aron J. Beatty
Assistant Consumer Advocate
PA Attorney I.D. # 86625

For: Irwin A. Popowsky
Consumer Advocate

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(717) 783-5048

Date: October 18, 2011

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. M-20112258733
 :
 PPL Electric Utilities Commission :
 Generation Supply Charge -1 :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Petition to Withdraw Complaint, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 18th day of October 2011.

SERVICE BY E-MAIL and INTEROFFICE MAIL

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