

October 17, 2011

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

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PA PUBLIC UTILITY COMMISSION  
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Re: Petition of PPL Electric Utilities Corporation for  
Approval of Time of Use Supplement No. 1102 to  
Tariff Electric PA PUC, No 201,  
Docket No. R-2011-2264771

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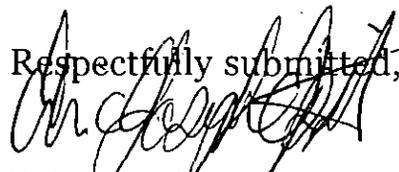
Petition to Intervene of  
Eric Joseph Epstein, *Pro se*

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") is an original and three (3) copies of Eric Joseph Epstein's ("Mr. Epstein" or "Epstein") Petition to Intervene in the Above-Referenced Proceeding. This Petition has been filed Pursuant to Commission Regulations, 52 Pennsylvania Code § Sections 5.71-5.74.

As shown by the attached Certificate of Service, all parties to this proceeding have been served via the United States Postal Service and electronic communication.

Respectfully submitted,

  
Eric Joseph Epstein, *Pro se*  
4100 Hillsdale Road  
Harrisburg, PA 17112

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**PENNSYLVANIA PUBLIC UTILITY  
COMMISSION**

Re: Petition of PPL Electric Utilities Corporation for  
Approval of Time of Use Supplement No. 1102 to  
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**I. Background.**

1) This Proceeding involves PPL Electric Utilities Corporation's ("PPL" or "the Company") filing at the Public Utility Commission's ("Commission") for Approval of Time of Use Supplement No. 1102 to Tariff Electric PA PUC, No 201, Docket No. R-2011-2264771

2) Eric Joseph Epstein ("Epstein" or "Mr. Epstein") is a residential rate payer and resides at:

4100 Hillsdale Road  
Harrisburg, PA 17112

**II. Procedural Background.**

3) On September 23, 2010, PPL Electric Utilities Corporation filed a Petition for Approval of Time of Use Supplement No. 94 to Tariff Electric PA PUC, No 201, Docket No. R-2010 with an issue date of September 23, 2010 and an effective date of January 1, 2011.

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4) PPL filed Supplement No. 1102 to its Tariff Electric-PA. PUC No. 201 on September 26, 2011 to implement a revised Time-of-Use ("TOU") program.

### **III. Mr. Epstein's Interest in this Proceeding.**

5) Mr. Epstein has been a residential customer of PPL for over 25 years, and has testified and intervened on issues relating to consumer education, universal service programming, rate structure, and reliability and service since 1985.

6) Mr. Epstein participated in PPL Electric Utilities Corporation's Request for Approval of a Competitive Bridge Plan Docket No. RP-0006227.

7) Epstein intervened and was an Active Party in PPL Electric Utilities Request for Approval to Offer Customers a Voluntary Alternative Energy Program and to Bank Alternative Energy Credits.

8) Mr. Epstein also intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of a Default Service Program and Procurement Plan for the Period January 1, 2011 through May 14, 2014.

9) Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of an Energy Efficiency and Conservation Plan.

10) In addition, Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of Time of Use Supplement No. 71 Tariff Electric PA PUC. No 201 Issued on July 31, 2009, Effective for Service On and After January 1, 2010.

11) Mr. Epstein intervened in PPL Electric Utilities Corporation's Petition for Approval of Time of Use Supplement No. 94 to Tariff Electric PA PUC, No 201, Docket No. R-2010 with an issue date of September 23, 2010 and an effective date of January 1, 2011.

12) Mr. Epstein is an active participant in PPL's Collaborative stake holder process, a proponent of TOU tariffs, and offered TOU programming suggestions during the TOU collaborative in 2007-2008 and in Direct Testimony submitted to the PUC on October 30, 2009.

#### **IV. Petition to Intervene.**

13) Mr. Epstein is a residential customer of PPL Electric Utilities Corporation.

14) Eric Joseph Epstein is analyzing PPL's assumptions, estimates, projections, methodologies, statements, citations, predictions, and conclusions associated with the Company's Present Filing.

15) The Present filing is an attempt to remove barriers, increase participation and eliminate current shortcomings as a result of the Supplement No. 94 Tariff.

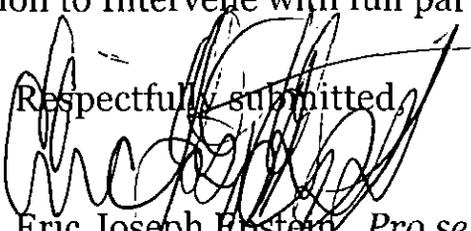
16) PPL's Present filing will require an evaluation of the following issues to avoid duplicating problems incurred the implementation of the Supplement No. 94 filing, included but not limited to: customer participation levels; implementation of Best Management & Practices and Lessons Learned; oversight and implementation of existing programs; pricing points and pricing differentials; program design; quantifiable energy savings; real-time pricing; time zones; and, the viability of the proposed TOU program.

17) Mr. Epstein reserves the right to raise any issues or questions relating to any discrepancies or errors in the Above-Referenced Proceeding.

**V. Conclusion**

18) Eric Joseph Epstein satisfies the standards for intervention under Section 5.72 of the Commission's regulations.

**WHEREFORE**, Eric Joseph Epstein respectfully requests that the Commission grant this Petition to Intervene with full party status.

Respectfully submitted,  
  
Eric Joseph Epstein, *Pro se*  
4100 Hillsdale Road  
Harrisburg, PA 17112

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## CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the active participants named below by US mail or hand delivery or electronic transmission in accordance with the requirements of Section 1.54.

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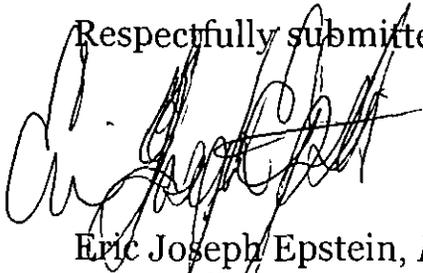
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Respectfully submitted,



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