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File #: 2507/140074

March 5, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**RE: Daniel Brunda v. PPL Electric Utilities Corporation; Docket No. C-2012-2286040;
PPL ELECTRIC UTILITIES CORPORATION REQUEST FOR RELIEF**

Dear Secretary Chiavetta:

Enclosed please find PPL Electric Utilities Corporation's Request for Relief in the above-referenced proceeding.

Copies have been provided to the parties in the manner indicated on the Certificate of Service.

Very truly yours,

Jessica R. Rogers

JRR/kmg
Enclosure

cc: Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Daniel Brunda,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2012-2286040
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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**REQUEST FOR RELIEF OF
PPL ELECTRIC UTILITIES CORPORATION**

TO ADMINISTRATIVE LAW JUDGE KATRINA L. DUNDERDALE:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), pursuant to 52 Pa. Code § 5.103, hereby files this Request for Relief in the above-captioned matter and states as follows:

I. PROCEDURAL HISTORY

On February 1, 2012, Daniel Brunda (“Complainant”) filed a formal complaint with the Public Utility Commission (“Commission”) against PPL Electric. Complainant’s claim relates to Electric and Magnetic Fields (“EMFs”) allegedly generated by the power lines surrounding his property in Lansford, Pennsylvania.

PPL Electric filed its Answer to the Complaint on February 21, 2012. In its Answer, PPL Electric denied Complainant’s allegations regarding EMFs.

On March 1, 2012, Administrative Law Judge Katrina L. Dunderdale (the “ALJ”) issued an Initial Hearing Notice, wherein the ALJ set an initial hearing for April 2, 2012.

II. ARGUMENT

PPL Electric requests that the initial hearing on April 2, 2012 be converted to a prehearing conference. Issues relating to EMFs are complex and technical. There is substantial literature regarding EMFs and their effects on health. In his complaint, Mr. Brunda has expressed some awareness of literature on EMFs and has indicated also that he has some knowledge regarding EMFs. PPL Electric at this time has no information regarding the literature on EMFs that Mr. Brunda or his expert, if he retains one, may rely on at the hearing.

At this time, PPL Electric is not certain how Mr. Brunda plans to proceed with this case. PPL Electric does not know whether Mr. Brunda intends to present only fact testimony or whether he intends to present expert testimony either on his own or from another person believed to have knowledge of the subject. Because PPL Electric does not know how Mr. Brunda intends to proceed, PPL Electric cannot determine how it should proceed in preparing its defense.

Under these circumstances, it is most appropriate that the initial hearing presently scheduled to be held on April 2, 2012 be converted into a prehearing conference. At a prehearing conference, the Administrative Law Judge and the parties can determine whether Mr. Brunda intends to present expert testimony and, if so, an appropriate schedule for presentation of written testimony, discovery and hearings can be developed.¹

PPL Electric is requesting that the initial hearing be converted into a prehearing conference so that it will have an opportunity to obtain information regarding the nature and scope of the evidence that Mr. Brunda intends to present at later hearings. If the matter proceeds directly to hearing, PPL Electric would have to attempt to anticipate all possible evidence that Mr. Brunda may present and prepare to respond to all possible contentions. A prehearing

¹ PPL Electric notes that it previously filed a request to have a hearing converted to a prehearing in another proceeding that is factually similar to this one, and had its request granted. *See Alan and Christine Villano v. PPL Electric Utilities Corporation*, C-2011-2259758 (Order entered on February 3, 2011)

conference would facilitate administrative efficiency by providing the parties with an opportunity to determine what expert witnesses will be required for this proceeding and what issues those experts should be prepared to address.

PPL Electric notes that, if attending a prehearing conference and subsequent hearings would impose a burden on Mr. Brunda, PPL Electric would not object to having the prehearing conference held telephonically.

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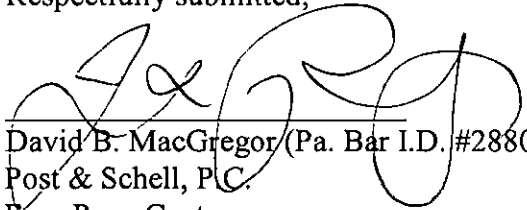
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III. CONCLUSION

For the reasons stated herein, PPL Electric requests that the initial hearing scheduled for April 2, 2012 be converted to a prehearing conference, so that the Company may have a reasonable opportunity to prepare expert testimony, if it is required.

Respectfully submitted,

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Dated: March 5, 2012

Attorneys for PPL Electric Utilities Corporation

NOTICE TO PLEAD

You are required to file and serve a response to this "Request for Relief" within 20 days after service. Failure to file a timely response to the "Request for Relief" may be deemed a default, and the relief requested may be granted.

CERTIFICATE OF SERVICE
Docket No. C-2012-2286040

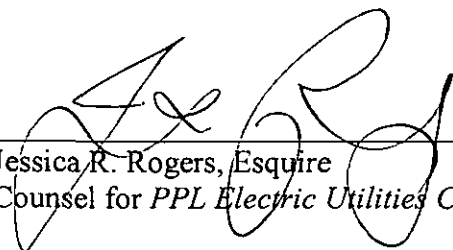
I hereby certify that I have this day served a true copy of PPL Electric Utilities Corporation's Request for Relief, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a parties).

VIA FIRST CLASS MAIL

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DATED: March 5, 2012



Jessica R. Rogers, Esquire
Counsel for *PPL Electric Utilities Corporation*

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