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File #: 2507/151802

June 6, 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: Chris and Melinda Maros v. PPL Electric Utilities Corporation
Docket No. C-2012-2305047

Dear Secretary Chiavetta:

Enclosed please find the Motion of PPL Electric Utilities Corporation to Defer and Hold in Abeyance the Complaint of Chris and Melinda Maros for the above-referenced proceeding. Copies will be provided as indicated on the certificate of service.

Respectfully Submitted,


Christopher T. Wright

CTW/skr

Enclosures

cc: Certificate of Service
Kimberly Hafner

CERTIFICATE OF SERVICE

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

VIA FIRST CLASS MAIL

Chris & Melinda Maros
586 Twin Rocks Road
Newfoundland, PA 18445

Date: June 6, 2012



Christopher T. Wright

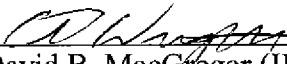
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Chris and Melinda Maros,	:	
	:	
Complainants,	:	
	:	
v.	:	Docket No. C-2012-2305047
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE §§ 5.61(a)(1) AND 5.103(c), YOU MAY ANSWER THE ENCLOSED MOTION WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE. YOUR ANSWER SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Date: June 6, 2012

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Chris and Melinda Maros,	:	
	:	
Complainants,	:	
	:	
v.	:	Docket No. C-2012-2305047
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**MOTION OF
PPL ELECTRIC UTILITIES CORPORATION
TO DEFER AND HOLD IN ABEYANCE
THE COMPLAINT OF CHRIS AND MELINDA MAROS**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric”) hereby files this Motion to defer and hold in abeyance the Complaint of Chris and Melinda Maros (“Complainants”) until such time as PPL Electric submits an appropriate and applicable siting application to the Pennsylvania Public Utility Commission (“Commission”) regarding the proposed transmission line project in the Pocono Mountains region of northeast Pennsylvania. In support thereof, PPL Electric states as follows:

I. PROCEDURAL BACKGROUND

1. PPL Electric is a “public utility” and an “electric distribution company” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803.

2. Complainants are residential customers of PPL Electric with a service address of 586 Twin Rocks Road, Newfoundland, Wayne County, Pennsylvania 18445.

3. PPL Electric was served with the above-captioned Formal Complaint by Secretarial Letter dated May 18, 2012. The Complaint raises issues related to the siting and route selection of a transmission line that PPL Electric proposes to construct in the future.

4. On June 6, 2012, PPL Electric filed an Answer to the Complaint asserting, among other things, that Complainants' claims regarding the proposed transmission line project are not ripe and should be dismissed without prejudice, and that Complainants' remedy is to participate in the Commission proceeding when PPL Electric files its siting application under 52 Pa. Code §§ 57.71 – 77. PPL Electric plans to file the application later this year.

5. To the extent that the Commission does not dismiss the Complaint without prejudice, PPL Electric herein requests, in the alternative, that the Complaint be held in abeyance pending the submission by PPL Electric of an appropriate filing seeking approval of the siting and construction of the transmission line so that the two related proceedings can be consolidated and considered together, and so that the proceedings can be adjudicated in an efficient manner on a complete record and with consistent results.

II. ARGUMENT

6. PPL Electric furnishes electric service to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

7. PPL Electric owns approximately 5,000 miles of transmission lines operating at 69 kV (kilovolts) or higher, approximately 375 substations with a capacity of 10 MVA

(megavolt amperes) or more, and approximately 43,000 miles of distribution lines operating at less than 69 kV.

8. Pursuant to Chapters 15 and 28 of the Public Utility Code, PPL Electric has a statutory obligation to provide adequate, efficient, safe, and reasonable service and facilities, and to make all repairs, changes, alterations, substitutions, extensions, or improvements in or to such service or facilities as necessary for the accommodation, convenience, and safety to its customers. PPL Electric is further required to provide reasonably continuous service without unreasonable interruptions or delay.

9. “Electric service is essential to the health and well-being of residents, to public safety and to orderly economic development, and electric service should be available to all customers on reasonable terms and conditions.” 66 Pa.C.S. § 2802(9). “Reliable electric service is of the utmost importance to the health, safety and welfare of the citizens of the Commonwealth.” 66 Pa.C.S. § 2802(12).

10. On or about October 11, 2011, PPL Electric announced that it has selected a proposed route for a new power line as part of a multi-year project to meet growing demand for electricity and to improve the reliability of electric service for homes and businesses in the Pocono Mountains region of northeast Pennsylvania.

11. The Complaint raises issues related to the siting and route selection of the proposed transmission line, including the alleged adverse effect on real estate values, the alleged risk of danger to the health and safety of the public, and issues related to eminent domain. The Complaint requests that PPL Electric select an alternative route.

12. The project referenced in the Complaint is still in the planning stage and has not yet been submitted to the Commission for review and approval. Once the planning has been

completed, PPL Electric intends to submit a full siting application requesting Commission approval of the siting and construction of the proposed transmission line. PPL Electric will provide the public notices for this project as required by Section 69.3102 of the Commission's Interim Siting Guidelines, 52 Pa. Code § 69.3102. Further, copies of the siting application and notifications of filing will be served in accordance with the provisions of Section 57.74 of the Commission's regulations, 52 Pa. Code § 57.74. To the extent that Complainants seek to raise issues related to the siting and route selection of the proposed line, Complainants' remedy is to participate in the Commission proceeding when PPL Electric files its siting application.

13. To the extent that PPL Electric exercises the power of eminent domain to acquire the rights-of-way and easements necessary for proposed transmission line, PPL Electric will fully comply with the statutory requirements of Section 1511 of the Business Corporation Law of 1988, 15 Pa.C.S. § 1511, and the Eminent Domain Code, 26 Pa.C.S. §§101 – 1106. Further, PPL Electric will provide the notice of eminent domain power required by Subchapter I of the Commission regulations, 52 Pa. Code §§ 57.71-57.77, 57.91-57.93, and will fully comply with the Commission's Interim Siting Guidelines, 52 Pa. Code §§ 69.3101-69.3107. In addition, copies of any condemnation applications seeking Commission approval to exercise the power of eminent domain will be served on the owners of land subject to eminent domain proceedings in accordance with the Commission's regulations. To the extent that Complainants seek to raise issues related to eminent domain, their remedy is to participate in the Commission proceeding if and when PPL Electric files an applicable condemnation application.

14. It is clear that the above-captioned Complaint and the forthcoming siting application are interrelated and raise common issues of law and fact. Because the disposition of each of these matters is interrelated, the consolidation of these proceedings will promote the

efficient use of the time and resources of the parties and the Commission. Upon filing the above-mentioned siting application, PPL Electric will timely file a motion to consolidate the Complaint with the siting application for purposes of hearings and a decision.

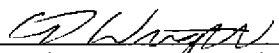
15. Based on the foregoing, the Complaint should be held in abeyance pending the filing by PPL Electric of the applicable application seeking approval of the siting and construction of the transmission line so that the two related proceedings can be consolidated and considered together, and so that the proceedings can be adjudicated in an efficient manner on a complete record and with consistent results.

III. CONCLUSION

WHEREFORE, PPL Electric respectfully requests that Complaint of Chris and Melinda Maros be deferred and held in abeyance until such time as PPL Electric submits an appropriate siting application to the Pennsylvania Public Utility Commission regarding the proposed transmission line project in northeast Pennsylvania and the Pocono Mountains region, at which time PPL Electric will move to consolidate the related proceedings.

Respectfully submitted,

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Date: June 6, 2011

Attorneys for PPL Electric Utilities Corporation