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File #: 2507/140074

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: Daniel Brunda v. PPL Electric Utilities Corporation; Docket No. C-2012-2286040;
PPL ELECTRIC UTILITIES CORPORATION MOTION TO RESCHEDULE
HEARINGS**

Dear Secretary Chiavetta:

Enclosed please find PPL Electric Utilities Corporation's Motion to Reschedule Hearings 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
Counsel for PPL Electric Utilities Corporation

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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MOTION TO RESCHEDULE HEARINGS

TO ADMINISTRATIVE LAW JUDGE KATRINA L. DUNDERDALE:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) files this Motion pursuant to 52 Pa. Code § 1.15 requesting to reschedule the hearing currently set for August 9, 2012. The basis for this request is to alleviate a scheduling conflict for PPL Electric’s counsel in this proceeding and in another proceeding, both of which are pending presently before the Pennsylvania Public Utility Commission (“Commission”). Counsel for the Complainant has been contacted and does not object to the extension.

I. PROCEDURAL HISTORY

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

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

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

4. On March 5, 2012, PPL Electric filed a request for relief asking that the initial hearing scheduled for April 2, 2012, be converted to a prehearing conference. The ALJ granted the Company’s request, and a revised hearing notice was issued on March 13, 2012.

5. On April 2, 2012, a telephonic prehearing conference was held before the ALJ. At the prehearing conference, the parties agreed to the establishment of a procedural schedule that would include prefiled written testimony by both parties.

6. On April 25, 2012, the ALJ issued an order which included a procedural schedule. In that schedule, Complainant’s testimony was due on May 18, 2012, and a telephonic hearing was scheduled for June 21, 2012.

7. On May 9, 2012, David P. Schroth, Esq., counsel for the Complainant in New Jersey, requested an extension of the due date for Complainant’s direct written testimony, in order to provide the Complainant sufficient time to obtain Pennsylvania counsel to represent him in this matter. No copy of this request was served on PPL Electric or its counsel.

8. On May 11, 2012, the ALJ issued the Third Interim Order, granting the Complainant’s request for an extension. On May 22, 2012, the Commission issued a revised notice of telephonic hearing. The date set forth in that notice for the telephonic hearing is August 9, 2012.

II. ARGUMENT

9. PPL Electric requests that the telephonic hearing scheduled for August 9, 2012 be moved to a later date. PPL Electric proposes August 20, 2012, as the preferred rescheduled date,

and August 16, 2012, as a second date. PPL Electric has confirmed that counsel for the Complainant is available on the proffered dates.

10. The Complainant's case relates to EMFs. As stated in PPL Electric's request for relief, issues relating to EMFs are complex and technical. At this time, PPL Electric is not certain how Mr. Brunda plans to proceed with this case, and what aspects of EMFs Mr. Brunda intends to address. Issues related to EMFs may be raised in a variety of specialties including medical science, basic science, engineering, physics, and epidemiology.

11. PPL Electric currently has a base rate case proceeding pending before Administrative Law Judge Susan D. Colwell, at Docket No. R-2012-2290597. Judge Colwell has set hearings in the base rate case for August 6, 7, 9, and 10, 2012. PPL Electric is represented in the base rate case by Paul E. Russell, David B. MacGregor, and John H. Isom. These attorneys also represent PPL Electric in the above-captioned proceeding. The base rate case is a complex and technically demanding proceeding that will likely involve 100 or more issues and sub issues. These three attorneys have been involved in this filing and its preparation for over a year, and are indispensable in litigating PPL Electric's base rate case before Judge Colwell. They cannot be available for hearings in the above-captioned complaint on August 9.

12. Although PPL Electric is also represented by Jessica Rogers in this proceeding, Ms. Rogers is a junior associate with no experience in hearings before the Commission or in which issues related to electric and/or magnetic fields have been raised. Due to the complicated nature of the claims that may be presented in this case, it is important that PPL Electric be represented by counsel with experience in hearings before the Commission and with experience in proceedings involving electric and/ or magnetic fields.

13. If the schedule cannot be revised, additional more senior counsel from Post & Schell will have to be involved in this matter. This is possible, however it represents a significant time and expense in order for an additional senior attorney to become familiar with the subject matter and issues involved in the case.

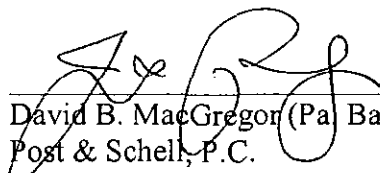
14. When the conflict in procedural schedules became apparent, PPL Electric contacted counsel for the Complainant to discuss alternative hearing dates. All parties are available on August 20, 2012, and would prefer that date for a telephonic hearing. Should that date not be available for the ALJ, the parties have agreed to August 16, 2012 as an alternative date.

III. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the hearing in the above-referenced proceeding be rescheduled as set forth herein.

Respectfully submitted,

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Dated: June 6, 2012

Attorneys for PPL Electric Utilities Corporation

CERTIFICATE OF SERVICE
Docket No. C-2012-2286040

I hereby certify that a true and correct copy of the foregoing has 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

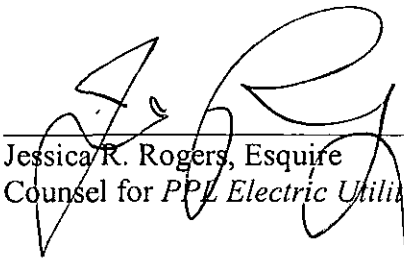
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DATED: June 6, 2012



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