



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Christopher T. Wright

cwright@postschell.com
717-612-6013 Direct
717-731-1985 Direct Fax
File #: 2507/151801

January 22, 2013

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: Audrey Imhoff v. PPL Electric Utilities Corporation
Docket No. C-2013-2343022

Dear Secretary Chiavetta:

Attached please find the Motion of PPL Electric Utilities Corporation to Defer and Hold in Abeyance the Complaint of Audrey Imhoff in the above-referenced proceeding. Copies will be provided as indicated on the certificate of service.

Respectfully,

Christopher T. Wright

CTW/skr
Attachment

cc: Certificate of Service

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

Audrey Imhoff
184 Boulder Hill Road
Mohnton, PA 19540

Date: January 22, 2013



Christopher T. Wright

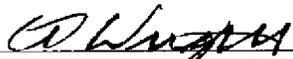
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Audrey Imhoff,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2013-2343022
	:	
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.

Paul E. Russell (ID # 21643)
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18106
Phone: 610-774-4254
Fax: 215-587-1444
E-mail: perussell@pplweb.com


David B. MacGregor (ID # 28804)
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
Phone: 215-587-1197
Fax: 610-774-6726
E-mail: dmacgregor@postschell.com

Of Counsel:

Post & Schell, P.C.

John H. Isom (ID # 16569)
Christopher T. Wright (ID # 203412)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: jisom@postschell.com
cwright@postschell.com

Date: January 22, 2013

Attorneys for PPL Electric Utilities Corporation

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PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**MOTION OF
PPL ELECTRIC UTILITIES CORPORATION
TO DEFER AND HOLD IN ABEYANCE
THE COMPLAINT OF AUDREY IMHOFF**

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 Audrey Imhoff (“Complainant”) until such time as PPL Electric submits an appropriate filing requesting Pennsylvania Public Utility Commission (“Commission”) approval of the siting and construction of a proposed transmission line project in the Lancaster region of 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. Complainant is a residential customer of PPL Electric with a service address of 184 Boulder Hill Road, Mohnton, Lancaster County, Pennsylvania 19540.

3. PPL Electric was served with the above-captioned Formal Complaint by a Secretarial Letter dated January 14, 2013. 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. Contemporaneously with this Motion, PPL Electric is filing an Answer to the Complaint asserting, among other things, that Complainant's claims regarding the proposed transmission line project are not ripe and should be dismissed without prejudice, and that Complainant's remedy is to participate in the Commission proceeding when PPL Electric files its request for Commission approval under 52 Pa. Code §§ 57.71 – 77. PPL Electric plans to submit an appropriate filing for Commission approval 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.... Reliable electric service is of the utmost importance to the health, safety and welfare of the citizens of the Commonwealth.” 66 Pa.C.S. §§ 2808(9), (12).

10. On or about April 4, 2012, PPL Electric announced a multiyear project to meet growing demand for electricity and to reinforce the regional electric grid and improve service reliability for homes and businesses in the Lancaster region.

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 concerns regarding the route for the proposed transmission line. 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. No final decision regarding the route for the project has been made. Depending upon the route ultimately chosen for the project, the Complainant’s concerns may become moot.

13. Once the planning has been completed, PPL Electric intends to submit an appropriate filing 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 filing 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.

14. It is clear that the above-captioned Complaint and the forthcoming filing by PPL Electric 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 request for Commission approval of the siting and construction of the proposed transmission line, PPL Electric will timely file a motion to consolidate the Complaint with the filing for purposes of hearings and a decision.

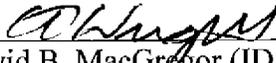
15. Based on the foregoing, the Complaint should be held in abeyance pending the submission by PPL Electric of an appropriate filing requesting Commission approval of the siting and construction of the proposed transmission line so that the two related proceedings can be consolidated and considered together, 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 Audrey Imhoff be deferred and held in abeyance until such time as PPL Electric submits an appropriate filing to the Pennsylvania Public Utility Commission regarding the proposed transmission line project in the Lancaster region of Pennsylvania, at which time PPL Electric will move to consolidate the related proceedings.

Respectfully submitted,

Paul E. Russell (ID # 21643)
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18106
Phone: 610-774-4254
Fax: 215-587-1444
E-mail: perussell@pplweb.com


David B. MacGregor (ID # 28804)
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
Phone: 215-587-1197
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PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

PROPOSED ORDER

AND NOW, in consideration of the Motion to defer and hold in abeyance filed by PPL Electric Utilities Corporation on January 22, 2013,

IT IS ORDERED:

1. That the Motion filed by PPL Electric Utilities Corporation is granted.
2. That the above-captioned Complaint is deferred and held in abeyance pending the filing by PPL Electric Utilities Corporation of an appropriate filing requesting Pennsylvania Public Utility Commission approval of the siting and construction of the proposed transmission line that is the subject of the Complaint.
3. That, upon filing its request for approval of the siting and construction of the proposed transmission line, PPL Electric is directed to timely file a motion to consolidate the Complaint with the filing for purposes of hearings and a decision.

Date
