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January 28, 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: Daniel Brunda v. PPL Electric Utilities Corporation**  
**Docket No. C-2012-2286040**

Dear Secretary Chiavetta:

Attached for electronic filing are the Reply Exceptions of PPL Electric Utilities Corporation for the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully,

Jessica R. Rogers

JRR/skr  
Enclosure

cc: Honorable Katrina L. Dunderdale  
Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing correspondence 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).

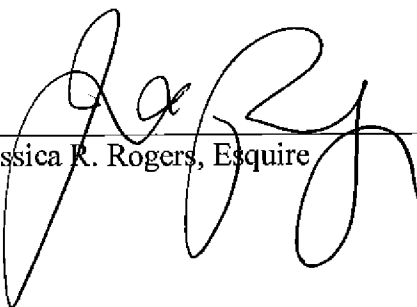
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DATED: January 28, 2013

  
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Jessica R. Rogers, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**REPLY EXCEPTIONS OF  
PPL ELECTRIC UTILITIES CORPORATION**

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## **I. INTRODUCTION**

On February 1, 2012, Daniel Brunda (“Complainant”) filed with the Pennsylvania Public Utility Commission (“Commission”) a formal complaint against PPL Electric Utilities Corporation (“PPL Electric”). Complainant’s claim relates to Electric and/or Magnetic Fields (“EMFs”) generated by the power lines adjacent to his property in Lansford, Pennsylvania. PPL Electric filed an Answer to the Complaint on February 21, 2012.

On August 16, 2012, Administrative Law Judge Katrina L. Dunderdale (the “ALJ”) presided over a telephonic evidentiary hearing, wherein PPL Electric and the Complainant moved into the record their previously served written direct testimony. At the hearing, the Complainant also requested that the ALJ accept into the record an additional document, to which the Complainant had referred to during the hearing. The document was later identified as Complainant’s Exhibit 2. On August 31, 2012, PPL Electric filed a Motion to Reopen the Record. In its Motion, the Company requested that the record be re-opened for the limited purpose of admitting PPL Electric’s response to the Complainant’s Exhibit 2, which was set forth in the Verification of Michael J. Silva (“Verification”). On September 27, 2012, the ALJ issued the Seventh Interim Order, wherein she admitted PPL Electric’s Verification into the record and set briefing dates. Pursuant to the Seventh Interim Order, PPL Electric filed its brief on October 12, 2012. No brief was filed by the Complainant.

The ALJ issued her Recommended Decision (“R.D.”) on December 27, 2012, wherein she found that the Complainant failed to meet his burden of proof. On January 14, 2013, Complainant filed exceptions. In his Exceptions, he has stated, generally, that: (1) the ALJ’s findings of fact are incorrect; (2) the Commission’s policies, precedent, and nation-wide practices present a dangerous threat to the public; and (3) PPL Electric’s 12 kV distribution system is of poor quality.

PPL Electric files these Reply Exceptions, pursuant to 52 Pa. Code § 5.533, and the Secretarial Letter dated December 27, 2012. For the reasons explained below, PPL Electric respectfully requests that the Commission reject the Complainant's Exceptions and adopt the ALJ's Recommended Decision.

## **II. REPLY EXCEPTIONS**

### **A. THE ALJ'S DETERMINATION IS SUPPORTED BY THE RECORD.**

The Complainant asserts, based entirely on his personal opinion, that the distribution lines near his property in Lansford, Pennsylvania, pose a health and safety risk as a result of the EMFs produced by the normal operation of the lines. The distribution lines near his property are owned and operated by PPL Electric. In support of his position, the Complainant has provided only his personal opinions on the matter. The Complainant has failed to carry his burden of proof in this proceeding, because he has failed to provide any credible evidence showing that PPL Electric's distribution lines in Lansford, which are like millions of miles of distribution lines throughout the rest of PPL Electric's service territory, the rest of Pennsylvania and the rest of the United States, pose a health risk.

To respond to the Complainant, PPL Electric produced the testimony and Verification of Mr. Michael J. Silva. Mr. Silva is a licensed professional electrical engineer in California and seven other states, including Pennsylvania. He has worked as a design and research engineer on electrical projects for over 41 years. He is the President and Founder of Enertech. Enertech is a scientific research and consulting firm that specializes in applied research projects, engineering, exposure assessment, electromagnetic compatibility, and the development of computer software and instruments to calculate and measure EMFs. PPL Electric St. No. 1, p. 3. Enertech has conducted applied research projects involving EMF exposure assessment and EMF evaluations for major studies with researchers from state and federal government organizations, top

universities, and research institutions. *Id.* at 4. The company also develops and manufactures high quality instrumentation for accurate measurement of EMFs and conducts a variety of measurement programs throughout the world. *Id.* Finally, the company develops computer software for calculating EMF levels, analyzing measurement data and modeling EMF and electrical environments. *Id.*

Mr. Silva explained that the term “EMF” refers to two phenomena — electric fields and magnetic fields. Electric fields are created as a result of electrical voltage; magnetic fields are created by electric current. *Id.* at 7. A field is a space or region in which the influence can be said to exist. *Id.* EMFs are produced by many products associated with everyday living, including wiring in homes and businesses, power lines, lighting, home appliances, power tools, computers, electrical equipment in offices and medical or industrial facilities, and many other common sources. In his testimony, Mr. Silva produced measurements of magnetic field levels in public places in the nearby City of Scranton, Pennsylvania showing that exposure to magnetic fields is a routine aspect of daily life. PPL Electric St. No. 1, PPL Electric Exhibit JMS-1 and JMS-2. People are exposed to a wide range of field levels from a variety of sources during everyday activities. PPL Electric St. No. 1, p. 14.

The weight of scientific literature has concluded that there has been no scientific demonstration that magnetic fields cause adverse health effects. The World Health Organization (“WHO”) is the directing and coordinating authority for health within the United Nations system. It is responsible for providing leadership on global health matters, shaping the health research agenda, setting norms and standards, articulating evidence-based policy options, providing technical support to countries and monitoring and assessing health trends. The WHO, in 2007, reviewed the scientific research on EMFs and provided information to the public to address

health concerns. PPL Electric St. No. 1, p. 23. The WHO concluded that there is no evidence to support a conclusion that exposure to low level electromagnetic fields is harmful to human health. R.D. at 6. There are no federal or Pennsylvania standards regarding magnetic field exposures. R.D. at 5. No state has adopted magnetic field exposure limits for distribution lines. PPL Electric St. No. 1, p. 15. Some people, however, have expressed concerns about exposure limits. As a result of these concerns, as explained below, two well-respected international organizations have developed voluntary guidelines for the general public's exposure to magnetic fields. PPL Electric St. No. 1, p. 15.

The Institute of Electrical and Electronics Engineers ("IEEE") is one of the leading standards-making organizations in the world. IEEE standards are relied upon in many areas, including power and energy, biomedical and health care, telecommunications, and nanotechnology, among others. PPL Electric Verification, p. 2. The International Commission on Non-Ionizing Radiation Protection ("ICNIRP") is an independent scientific organization that provides expert advice and guidance about EMF in the frequency range from 0 Hz up to 300 GHz, including 60 Hz power frequency EMF. *Id.* ICNIRP's exposure guidelines have been adopted in more than 50 countries. The IEEE and ICNIRP exposure standards for EMF were developed by committees of scientific experts and have been expressly endorsed by the WHO, among others. *Id.*

Most alternating current electric power in the United States and in PPL Electric's service territory has a frequency of 60 Hz. PPL Electric St. No. 1, p. 8. ICNIRP recommends that, for the general public, 60 Hz magnetic field exposures should not exceed 2,000 mG.<sup>1</sup> PPL Electric

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<sup>1</sup> A Gauss (G) is the most common unit used by engineers to describe a magnetic field. One milligauss equals 1/1000 of a Gauss (1 mG = 0.001 G)

St. No. 1, p. 15. The IEEE recommends that public exposures to 60 Hz magnetic fields should not exceed 9,040 mG. R.D. at 5.

PPL Electric measured magnetic field levels at various locations on Complainant's property on May 2, 1994, May 7, 2004, January 12, 2006, and April 29, 2011. R.D. at 6. The average of the measurements taken at Mr. Brunda's property, near the residence, at different times from 1994 to 2011 is 0.7 mG. PPL Electric St. No. 1, pp. 19-20. Further, contrary to the Complainant's assertions in his Exceptions, PPL Electric included measurements taken directly under the distribution lines in the right-of-way. R.D. at 6. The magnetic field levels measured by PPL Electric at the Complainant's property are common, and it is common to find EMF levels many times higher in homes and public places across the United States. PPL Electric St. No. 1, p. 19.

In the 1990's, Mr. Silva's company, Enertech, conducted a large research program involving comprehensive measurements of EMF levels in approximately 1,000 homes across the United States. Based on the results of this nationwide study, the average magnetic field levels at more than 63 million homes in the United States are at or higher than the average magnetic field level at the Complainant's property near the residence. PPL Electric St. No. 1, p. 20. In addition, Enertech conducted a large research program for the Department of Energy and the National Institute of Environmental Health Sciences to assess the daily magnetic field exposures of over 1,000 people across the United States. Based on this study, the average daily exposures of over 187 million people in the United States equal or exceed the average level measured at the property near the residence. *Id.*

Although Pennsylvania has not adopted specific standards for EMF levels, PPL Electric's distribution lines near Mr. Brunda's property comply with widely-accepted industry standards.

PPL Electric has shown that the lines in question do not increase EMF exposure to a level greater than that which is experienced by millions of Americans each day. The Complainant has offered no credible evidence that exposure to EMFs is harmful. He has not cited any scientific or medical sources, and has relied entirely on his personal opinion that exposure to EMFs is harmful. From the record evidence, the R.D. properly concludes that Complainant has failed to meet his burden of proof.

**B. COMPLAINANT’S EVIDENCE IS NOT CREDIBLE.**

In his Exceptions, the Complainant has presented three principal arguments. They are similar to those he made in his testimony and Exhibits. First, the Complainant argues that United States Nuclear Regulatory Commission (“NRC”) standards apply to EMFs. Second, he argues that the IEEE and WHO are not credible organizations and are factually incorrect in their conclusions regarding EMFs. Third, he argues that the configuration of not only PPL Electric’s, but also the entire nation’s, power system is a “universal plague.” None of these arguments is credible, and the Commission should reject them. In addition, the Complainant has attempted to introduce additional evidence into the record through his Exceptions. His attempt to introduce new evidence is procedurally inappropriate, and the Commission should not consider or give any weight to it. In any event, the evidence lacks credibility.

The Complainant first raised the NRC standards in his Complaint. In responding to the allegation that these standards apply to PPL Electric and that PPL Electric is in violation of them, Mr. Silva testified that:

The federal regulations set forth in CFR-20.1301 are the nuclear radiation dose limits adopted by the NRC. The regulations specifically state that they relate to exposure to “ionizing radiation” due to activities conducted under licenses issued by the NRC. The exposure limit in the regulation is in units of rem (Roentgen Equivalent in Man/Mammal) or the modern unit of the Sievert, which apply to radioactive emissions, not power frequency EMF. There is no mention of power line EMF in these NRC regulations.

PPL Electric St. 1, pp. 16-17. The R.D. correctly found that the NRC has not adopted exposure limits for power frequency EMFs. R.D. at 5. Complainant provided no additional evidence to support his assertion that the NRC standards apply to EMFs or to PPL Electric. Complainant's contention that NRC standards apply to PPL Electric is not credible, and was properly rejected by the ALJ.

The Complainant also states in his Exceptions that, "The WHO is completely wrong about the safety of aerial powerlines." Exceptions, p. 3. Complainant made similar arguments in Exhibit 2, where he also stated that IEEE and ICNIRP guidelines were, "just a lot of hot air." Complainant's Exhibit 2. Mr. Silva addressed these claims, testifying that:

The IEEE is one of the leading standards-making organizations in the world, and IEEE standards are relied upon in many areas, including power and energy, biomedical and healthcare, telecommunications, and nanotechnology, among others ... ICNIRP's exposure guidelines have been adopted by national authorities in more than 50 countries. The IEEE and ICNIRP exposure standards for EMF ... were developed by committees of scientific experts and have been expressly endorsed by the World Health Organization (WHO), among others. Mr. Brunda may believe, based on his own novel theories, that "THE WHO IS COMPLETELY WRONG" (Exhibit 2, p. 2) about EMF, but WHO nonetheless is a well-recognized international public health agency and recently convened panels of scientific experts to conduct an extensive review of EMF research.

Verification, p. 2. Complainant's arguments regarding these organizations were reviewed by the ALJ, and were correctly rejected as being based entirely on Complainant's opinion and unsupported by any additional record evidence. With no support outside his own opinion, Complainant would have the Commission find that his testimony is more credible than PPL Electric's expert witness, two well respected scientific organizations, and a well-recognized international public health agency. More than that, Complainant alleges that these sources of information are completely wrong, with no evidence aside from his personal opinion. The record evidence shows that, contrary to the Complainant's claims, the evidence relied upon by PPL

Electric is generally accepted by experts in the field and has received thorough assessment by the scientific community. Complainant's personal opinion is not credible evidence sufficient to overcome the evidence presented by PPL Electric.

In addition, in his Exceptions, the Complainant refers to the "universal plague" which he believes is caused by aerial transmission and distribution lines throughout the United States and the world. This contention must be rejected on its face as lacking credibility. Looking at Pennsylvania, alone, although there have been many cases before the Commission raising claims regarding the effect of EMFs on human health, the Commission has never found that EMFs pose a health or safety risk. The ALJ cited three Commission determinations on EMFs to support the Recommended Decision.<sup>2</sup> R.D. at 9. The Complainant rejects the Commission determinations as "irrelevant because they do not prove the safety and quality of aerial powerlines." Exceptions, p. 3. On the contrary, in all three of those cases, the Commission determined that the proposed aerial lines did not pose a safety risk to the public.

In his Exceptions, Complainant states that "the safety and quality of aerial powerlines ... are proven to be a universal plague," and that, "all aerial powerlines are a universal plague." (Exceptions, p. 3.) Despite Complainant's opinion, there is no conclusive scientific proof that EMFs generated by electric transmission and distribution lines cause adverse health effects. The record clearly indicates that the WHO conducted a major review of EMF research in 2007 and concluded that there is no evidence to support a conclusion that exposure to low levels of electromagnetic fields are harmful to human health. R.D. at 6.

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<sup>2</sup> *Application of PPL Electric Utilities Corp.*, Docket No. A-2009-2082652 (Order entered Feb. 12, 2010); *Letter Notification of Philadelphia Electric Co.*, Docket No. A-1105500F0155 (Order entered Nov. 12, 1993); and *Certification Application of Pennsylvania Power and Light Co.*, Docket Nos. A-110500F0162 and A-110500F0169 (Order entered Mar. 17, 1994).

Finally, Complainant has raised arguments in his Exceptions which were not previously presented during this proceeding. Complainant has presented evidence in his Exceptions regarding shielding and “harmful noise.” Exceptions, p. 2. Complainant did not raise any arguments regarding these two items during the preceding and presented no evidence on these subjects. Pursuant to 52 Pa. Code § 5.431, new information presented after the close of the record should not be considered. *See Melissa Randall v. PECO Energy Company*, 2010 Pa. PUC LEXIS 734 (Pa. PUC 2010) (“In the Exceptions, the Complainant is inappropriately attempting to introduce new evidence after the close of the record. The record in this matter is closed, and we will not consider any Exceptions that seek to introduce new facts into the record.”) *Application of PPL Electric Utilities Corporation Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G for Approval of the Siting and Construction of the Effort Mountain No. 1 and No. 2 138 kV Taps in Chestnuthill and Polk Townships, Monroe County, Pennsylvania*, 2011 Pa. PUC LEXIS 1135 (Pa. PUC 2011) (“PPL is correct that these particular assertions constitute new evidence and arguments not previously submitted and are improperly raised at the exceptions stage.”) Exceptions are not an appropriate forum for raising new evidence. Thus the arguments related to shielding and harmful noise should be rejected as being untimely.

In addition, Complainant’s evidence and arguments on shielding and harmful noise lack credibility. Complainant’s argument in support of shielding states that: “Low voltage electrical cables can also be easily shielded by an electrician in various ways: one of which is to use BXMC steel shielded cables. There are others. My entire house in New Jersey is shielded with aluminum siding and shielded electrical cables.” Exceptions, p. 2. PPL Electric does not know what Complainant is proposing, or what he is referring to when he discusses “BXMC” shielding. No record evidence was produced regarding what a “BXMC” steel shielded cable is and whether

it is appropriate for use on PPL Electric's distribution system. Further, presenting his own home as evidence of the viability of shielding the lines, without any additional scientific analysis, is not credible evidence that shielding distribution lines will improve safety on a distribution system. There is no evidence regarding cost, engineering considerations, or the impact of shielding on reliability of service. Complainant has also raised claims about "very harmful noise" which were never previously presented. His claims with regard to the "harmful noise" and its impact on human health should be rejected as completely unsupported by the record in this proceeding.

The ALJ correctly determined, after weighing all the record evidence, that the evidence presented by the Complainant is not credible and that, as a result, the Complainant did not meet his burden of proof in this proceeding. The presentation of additional evidence in Exceptions is procedurally inappropriate, and also the evidence is not credible. The Recommended Decision should be adopted, because it gave appropriate consideration to the record evidence.

**C. PPL ELECTRIC'S DISTRIBUTION SYSTEM IS SAFE AND RELIABLE.**

The Complainant has argued in his Exceptions that PPL Electric's system is of "poor quality." Exceptions, p. 2. The Complainant has not provided any credible scientific evidence to support this claim. Both distribution lines near the Complainant's property are safe. They were designed in accordance with commonly used industry standards. PPL Electric St. No. 1, p. 23. The distribution lines adjacent to the property are typical of the millions of miles of residential power distribution lines that have been in operation throughout Pennsylvania and the United States for many decades. *Id.* There is nothing unusual about these lines. Verification, p. 2. There also is nothing unusual about the EMF levels from the lines, which are similar to or less than EMF levels from many sources in our daily environments and are far lower than the EMF exposure level limits recommended by credible international expert organizations. *Id.* There is

no evidence supporting Complainant's claim that these universally used distribution lines pose a health and safety risk to the public.

While Complainant has not provided any evidence to show that PPL Electric's system is unsafe, in his Exceptions he argues that PPL Electric should redesign its system to make it "safe." Complainant's proposal for redesigning the entire electric system in order to make it "safe," by reducing the operating voltage from 12 kV to less than 4 kV, should be rejected for two principle reasons. First, as explained by Mr. Silva, lowering the voltage of the distribution lines would be ineffective to address Mr. Brunda's concerns. In fact, lowering the voltage would actually increase, not decrease, the magnetic field levels. R.D. at 6. This increase would result because electrical power is the product of voltage and current. A specific power level is needed to serve Mr. Brunda's property and nearby properties. If the voltage on the distribution lines were reduced, then the amount of current, the amperage, would have to be increased in order to provide the same level of electric power to the neighborhood. PPL Electric St. No. 1, p. 22. Magnetic fields are directly related to the amount of current. Therefore, increasing the amount of current on the distribution lines would also increase magnetic fields. *Id.* At a voltage of 4 kV or lower, the amount of current on the lines would be at least three times higher than at the present 12 kV voltage. R.D. at 6. Therefore, the magnetic field levels would similarly be at least three times higher than they are now. *Id.* Adopting Mr. Brunda's proposal would have the opposite impact of what he desires.

Second, adopting the Complainant's proposal would have serious implications for PPL Electric's distribution system and customers. A distribution system operated at less than 4 kV is not a standard distribution voltage and would require design, testing and installation of special custom-made transformers, as well as replacing the existing neighborhood distribution lines with

larger conductors and possibly installing new substation equipment to accommodate a low, non-standard distribution voltage. This voltage reduction would adversely affect the entire neighborhood distribution system and could create problems such as low voltage throughout the neighborhood that may require additional electrical distribution equipment to compensate for this problem. PPL Electric St. No. 1, p. 22. In asking for lower voltage, the Complainant recognized in Exhibit 2, p. 2, that, “lowering the voltage to 2-4kv clearly requires a reduction of the transmitted power” to Lansford. This statement means that Complainant contemplates that far less electric power would be distributed over the hypothetical 4 kV distribution system he proposes, which in turn would require other citizens, businesses, schools, and medical facilities in Lansford to drastically reduce their use of electric power. Verification, p. 2.

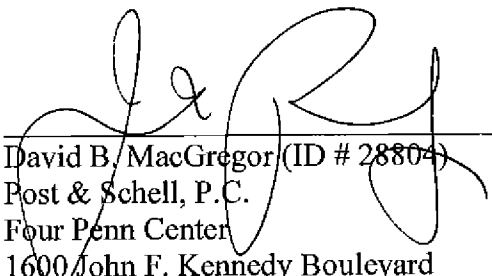
This situation, where customers would have to reduce their consumption as a result of inadequate supply of electricity, would constitute a violation of PPL Electric’s requirement to provide adequate and reasonably reliable service to its customers under 66 Pa. C.S. § 1501 and would present a serious health and safety risk to the public should this lack of capacity result in overloads and outages. Thus, granting the Complainant’s request would be ineffective, impractical, and unsafe.

**III. CONCLUSION**

The ALJ correctly applied the legal standards to this case and properly weighed the facts presented by both parties. For these reasons, the Exceptions of the Complainant should be rejected, and the Recommended Decision should be adopted.

Respectfully submitted,

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