



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166
Tel: 717.232.8000 • Fax: 717.237.5300

Adeolu A. Bakare
Direct Dial: 717.237.5290
Direct Fax: 717.260.1744
abakare@mwn.com

November 1, 2013

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**RE: PPL Electric Utilities Corporation – Act 129 Compliance Rider Supplement No. 139
to Tariff Electric – Pa. P.U.C. No. 201; Docket No. M-2013-2389549**

**PPL Electric Utilities Corporation – Act 129 Compliance Rider Supplement No. 140
to Tariff Electric – Pa. P.U.C. No. 201; Docket No. M-2013-2389551**

Dear Secretary Chiavetta:

On October 31, 2013, we electronically filed a letter regarding PPL Electric Utilities Corporation's Act 129 Compliance Rider Supplement No. 139 to Tariff Electric – Pa. P.U.C. No 201 ("Supplement No. 139") and Act 129 Compliance Rider Supplement No. 140 to Tariff Electric – Pa. P.U.C. No 201 ("Supplement No. 140"). The letter was filed at Docket Nos. M-2009-2092316 and M-2012-2334388, respectively. Per notice from Commission Staff, we are refiling the letter to reflect the Commission's assignments of Supplement No. 139 to Docket No. M-2013-2389549 and Supplement No. 140 to M-2013-2389551.

Parties to this proceeding are being duly served with a copy of this letter as shown by the attached Certificate of Service. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Adeolu A. Bakare
Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

c: Certificate of Service
Enclosure

www.mwn.com

HARRISBURG, PA • LANCASTER, PA • SCRANTON, PA • STATE COLLEGE, PA • COLUMBUS, OH • WASHINGTON, DC



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166
Tel: 717.232.8000 • Fax: 717.237.5300

Adeolu A. Bakare
Direct Dial: 717.237.5290
Direct Fax: 717.260.1744
abakare@mwn.com

November 1, 2013

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

RE: PPL Electric Utilities Corporation – Act 129 Compliance Rider Supplement No. 139 to Tariff Electric – Pa. P.U.C. No. 201; Docket No. M-2013-2389549

PPL Electric Utilities Corporation – Act 129 Compliance Rider Supplement No. 140 to Tariff Electric – Pa. P.U.C. No. 201; Docket No. M-2013-2389551

Dear Secretary Chiavetta:

On October 22, 2013, PPL Electric Utilities Corporation ("PPL" or "Company") filed Supplements No. 139 and 140 to Tariff - Electric Pa. P.U.C. No. 201 (individually, "Supplement No. 139" and "Supplement No. 140") (jointly, the "Supplements"). Supplement No. 139 proposes significant modifications to PPL's Act 129-1 Compliance Rider ("ACR-1"), which recovers and/or recoups costs related to PPL's reconciliation of its Phase I Energy Efficiency & Conservation ("EE&C") Plan. Similarly Supplement No. 140 proposes significant modifications to PPL's Act 129-2 Compliance Rider ("ACR-2"), which recovers costs related to PPL's Phase II EE&C Plan programs. The Supplements account for discrepancies between PPL's budgeted and actual Phase I EE&C costs. The Supplements also correct PPL's erroneous billing of the Large C&I ACR-1 and ACR-2 to customers' billing demand instead of customers' PJM Peak Load Contribution.¹

Supplement No. 139 proposes to shift approximately \$12.7 million of Phase I EE&C costs from the Small Commercial & Industrial ("C&I") class to the Large C&I class, resulting in a \$0.395/kW increase from the current rate of \$(0.021)/kW to \$0.416/kW. Supplement No. 140 proposes to shift approximately \$12.5 million of Phase I EE&C costs from the Small Commercial & Industrial ("C&I") and Residential classes to the Large C&I class, resulting in a \$0.394/kW increase from the current rate of \$0.533/kW to \$0.927/kW. Combined, the Supplements would modify PPL's net Act 129 charge to Large C&I customers from the current

¹ PPLICA acknowledges and appreciates the Company's diligence in self-reporting this error.

www.mwn.com

HARRISBURG, PA • LANCASTER, PA • SCRANTON, PA • STATE COLLEGE, PA • COLUMBUS, OH • WASHINGTON, DC

Rosemary Chiavetta, Secretary
November 1, 2013
Page 2

rate of \$0.533/kW to \$1.343/kW beginning November 1, 2013 and continuing through May 31, 2015.²

PPLICA has contacted PPL and is involved in informal discussions to review the Company's procedures for monitoring or reporting actual costs and the billing demand errors reported in Supplements No. 139 and 140. PPLICA is concerned that current policies generate unacceptable rate volatility as evidenced by the significant revenue adjustments outlined above. To that end, PPLICA reserves all rights to file a Complaint or take other appropriate action upon further review of the Tariff Supplements and any supporting data.

Parties to this proceeding are being duly served with a copy of this letter as shown by the attached Certificate of Service. Please date stamp the extra copy of this letter and kindly return it to our messenger for our filing purposes.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 

Adeolu A. Bakare
Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

AAB

c: Certificate of Service

² As proposed, PPL would recover only the ACR-2 after May 31, 2015.

CERTIFICATE OF SERVICE

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

VIA E-MAIL AND FIRST-CLASS MAIL

David B. MacGregor, Esq.
Post & Schell PC
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103
dmacgregor@postschell.com

John R. Evans, Esq.
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
jorevan@pa.gov

Andrew S. Tubbs, Esq.
Post & Schell PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101
atubbs@postschell.com

Christine Maloni Hoover, Esq.
Office of Consumer Advocate
555 Walnut Street
Forum Place 5th Floor
Harrisburg, PA 17101 1921
CHoover@paoca.org

Paul E. Russell, Esq.
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
perussell@pplweb.com

Johnnie Simms, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
josimms@pa.gov



Adeolu A. Bakare

Dated this 1st day of November, 2013, in Harrisburg, Pennsylvania.