



**Pennsylvania Power & Light Company**

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

KJR

ORIGINAL

Paul E. Russell  
Associate General Counsel  
610/774-4254

FAX: 610/774-6726

**DOCUMENT  
FOLDER**

January 10, 1995

**HAND DELIVERED**

Mr. John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

**Re: Pennsylvania Power & Light Company  
Supplement No. 50 to Tariff  
Electric Pa. P.U.C. No. 200  
Docket No. R-00943271**

RECEIVED  
95 JAN 10 AM 11:45  
PA. P. U. C.  
INFO. CONTROL DIV.

Dear Mr. Alford:

Enclosed for filing on behalf of Pennsylvania Power & Light Company (PP&L) are eight (8) copies of revised pages to Supplement No. 50 to PP&L's Tariff Electric - Pa. P.U.C. No. 200.

Supplement No. 50, which was filed on December 30, 1994, and requested to become effective 60 days after filing, i.e., on February 28, 1995, proposes to increase PP&L's retail base rates by approximately \$261 million, or about 11.7% (on total retail rates).

Pursuant to discussions with the Commission's Finance and Tariff Division, these tariff supplement page revisions are being filed to incorporate a corrected page numbering sequence.

Mr. John G. Alford

- 2 -

January 10, 1995

If you have any questions regarding the enclosed filing, please call.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paul E. Russell". The signature is written in a cursive style with a large initial "P" and "R".

Paul E. Russell

Enclosures

cc: Irwin A. Popowsky, Esquire  
Bernard J. Ryan, Jr., Esquire  
Charles F. Hoffman, Esquire  
Cheryl Walker Davis, Esquire  
Dr. Z. Ahmed Kaloko  
David M. Kleppinger, Esquire  
Mr. Robert F. Wilson

TABLE OF CONTENTS

R-00943271

	<u>Page</u>	<u>Revision</u>
Table of Contents .....	3	Fortieth
Territory Covered by This Tariff .....	3A	Thirteenth
	4	First
	4A	First
	4B	Original
<b>RULES FOR ELECTRIC SERVICE</b>		
1 - Electric Service Tariff .....	5	Original
2 - Requirements for Service .....	6	First
	6A	First
3 - Extension of Service .....	7	Second
	7A	Second
4 - Supply of Service .....	8	Second
	8A	First
	8B	Third
	8C	Fourth
5 - Use of Service .....	9	First
	9A	Original
6 - Auxiliary Service For Non-Qualifying Facilities .....	10	Sixth
	10A	Third
6A - Standby Service for Qualifying Facilities .....	10B	Third
	10C	Fourth
	10D	First
7 - Temporary Service .....	11	Second
8 - Measurement of Service .....	12	First
9 - Billing and Payment for Service .....	13	Second
	13A	First
10 - Disconnection and Reconnection of Service .....	14	Original
	14A	First
ENERGY COST RATE .....	15	Fifth
	15A	Fourth
	15B	First
STATE TAX ADJUSTMENT SURCHARGE .....	16	Sixteenth
EMERGENCY ENERGY CONSERVATION RIDER .....	17	First
SPECIAL BASE RATE CREDIT ADJUSTMENT .....	18	Tenth
ECONOMIC DEVELOPMENT INITIATIVES RIDER .....	19	Fifth
	19A	First
INTERRUPTIBLE SERVICE BY AGREEMENT .....	19B	Second
ELECTRIC VEHICLE RIDER (EXPERIMENTAL) .....	19C	Original
INDUSTRIAL DEVELOPMENT INITIATIVES RIDER .....	19D	Second
COMPETITIVE RATE RIDER (EXPERIMENTAL) .....	19E	First
<b>RATE SCHEDULES - GENERAL</b>		
RS - Residential Service .....	20	Fifth
	20A	Fourth
RTS - Residential Service - Thermal Storage .....	21	Ninth
	21A	First
RTD - Residential Service - Time of Day .....	22	Seventh
	22A	First
	23	Original
GS-1- Small General Service - Sec. Voltage or Higher .....	24	Eighth
	24A	Fifth
GS-3- Large General Service - Sec. Voltage or Higher .....	25	Ninth
	25A	Seventh
	26	Original
LP-4- Large General Service - 12 KV or Higher .....	27	Eleventh
	27A	Third
LP-5- Large General Service - 69 KV or Higher .....	28	Ninth
	28A	Seventh
LP-6- Large General Service - 69 KV or Higher .....	28B	Original
	28C	Original
LPEP- Power Service to Electric Propulsion.....	29	Second
	29A	Original
IS-1- Interruptible Service - Greenhouses .....	30	Sixth
PR-1- Price Response Service (Experimental) - Firm Power .....	31	Twelfth
	31A	Sixth
	31B	First

**DOCKETED**

JAN 13 1995

**DOCUMENT  
 FOLDER**

TABLE OF CONTENTS (CONTINUED)

	<u>Page</u>	<u>Revision</u>
PR-2- Price Response Service (Experimental) - Interruptible Power .....	32	Second
	32A	First
	32B	First
BL - Borderline Service - Electric Utilities .....	33	Sixth
SA - Private Area Lighting .....	34	Seventh
SM - Mercury Vapor Street Lighting .....	35	Sixth
	35A	First
	35B	Sixth
SHS - High Pressure Sodium Street Lighting.....	36	Seventh
	36A	Third
SE - Energy Only Street Lighting Service .....	37	Fourth
	37A	Third
.....	38	Original
<b>RATE SCHEDULES - RESTRICTED</b>		
TS(R) - Municipal Traffic Signal Lighting Service .....	39	Sixth
SI-1(R) - Municipal Street Lighting .....	40	Sixth
	40A	Third
GH-1(R) - Single Meter Com'l. Space Htg. Service .....	41	Eighth
	41A	Original
GH-2(R) - Separate Meter General Space Htg. Service .....	42	Sixth

ENERGY COST RATE

An energy cost rate (ECR) shall be applied to each kilowatt-hour supplied under this tariff, except for incremental and decremental kilowatt-hour usage under Rate Schedules PR-1 and PR-2. The ECR, determined to the nearest one-thousandth of 1 mill per kilowatt-hour in accordance with the formula set forth below, shall be applied to all kilowatt-hours billed during the billing month:

$$ECR = \left[ \frac{Fc}{St} - \frac{Fb}{Sb} - \frac{A}{Sr} + \left( \frac{A}{Sr} \times D \right) - \left( \frac{K}{Sr} \times D \right) + \left( \frac{P}{Sr} \times D \right) - \frac{E}{Sr} \right] \times \frac{1}{(1-T)} \quad (C)$$

The ECR so computed shall be filed with the Pennsylvania Public Utility Commission (Commission) by March 1 of each year. Such rate shall become effective for service rendered on and after the following April 1 unless otherwise ordered by the Commission, and shall remain in effect for a period of one year unless revised on an interim basis subject to the approval of the Commission. Upon determination that an ECR, if left unchanged, would result in a material over or under collection of energy costs incurred or expected to be incurred during the current 12-month period ending January 31, the Company may file with the Commission for an interim revision of the ECR, to become effective 30 days from the date of filing, unless otherwise ordered by the Commission.

Where:

ECR = Energy cost rate in mills per kilowatt-hour to be applied to each kilowatt-hour supplied under this tariff.

F<sub>c</sub> = The estimated energy-related cost of net energy generated by the Company's fossil and nuclear generating stations, adjusted to exclude the net change in the cost of energy applicable to incremental and decremental sales under Rate Schedules PR-1 and PR-2, and excluding the cost of energy generated for and sold to other utilities on a firm basis, plus the Company's energy-related cost of energy purchased, plus net costs associated with energy interchanged for the computation year (c), less revenues received for energy sold under interchange and other surplus power agreements, defined as follows: (C)

Fossil Generation - the costs charged to fuel Accounts 501 and 547 which are computed on the basis of the cost of fuel delivered to the generating site at which it is consumed, plus the cost of disposing of solid waste from sulfur oxide removal devices.

Nuclear Generation - the costs charged to fuel Accounts 518 and 521 (including Dept. of Energy assessment fees for the disposal of spent nuclear fuel and the decontamination and decommissioning of its uranium enrichment facilities) which are computed on the basis of the costs of such fuel delivered at the generating site at which it is consumed, after deducting therefrom the present salvage or reuse value of such fuel. (C)

Energy sales - the amounts of fossil and nuclear fuel costs incurred with respect to intersystem energy sales through firm power contracts. These amounts to be excluded.

Energy Purchases - the amounts charged to Account 555 associated with interchange and other energy purchases, excluding capacity or demand charges other than those associated with agreements for the purchase of energy at a cost (including associated demand charges) that is less than the energy-related cost of energy from available alternative sources; provided that, during a major fuel supply interruption, the Company's fuel inventory need not be considered an alternative source for the purpose of determining the applicability of including demand charges in the ECR.

Interchange Energy Sales - the amounts credited to Account 555 associated with interchange energy sold, excluding capacity or demand credits.

Test power - the amounts charged to Account 557 for the value assigned to the energy produced from facilities undergoing operational tests prior to being placed into commercial operation.

Sales for Resale (Account 447) - the amounts for economy energy sold under interchange and other surplus power agreements (including firm and interruptible output reservation contracts), net of associated energy-related delivery costs, which were previously credited to Account 555 and included in the ECR calculation and now are credited to Account 447 pursuant to instructions set forth in the FERC Accounting Release AR-14, issued November 25, 1991. ECR recoverable costs shall be no different than such costs determined prior to the effective date of AR-14. (C)

Emission Allowances - the amounts charged to Account 509 for the cost of allowances used in conjunction with corresponding amounts of sulfur dioxide emitted. Also, gains and losses from the disposition of those allowances associated with utility operations and recorded in Accounts 411.8 and 411.9, respectively.

(Continued)

(C) Indicates Change

ENERGY COST RATE (CONTINUED)

The computation year (c) shall be April 1 through March 31 for which the ECR as computed will apply. In projecting the Company's energy costs for the computation year, the estimated cost of energy generated and sold to other utilities on a firm basis and the estimated net effect on the Company's energy costs of generation forecast for the computation year from a base load unit expected to begin commercial operation, shall be excluded. When the in-service date of such a base load unit can be estimated with reasonable certainty, the Company shall file with the Commission no later than 30 days prior to the unit's expected in-service date for an interim revision of the ECR then in effect to reflect the estimated effect of the unit's operation on the Company's energy costs. Such interim revision of the ECR shall not become effective unless and until rates reflecting the unit's base rate revenue requirements become effective by order of the Commission.

- E = Experienced net over or under collection of energy costs as of the end of the 12-month period ending with the January billing period including interest. Interest shall be computed monthly at the appropriate rate as provided in Section 1308(d) of the Public Utility Code from the month the over or under collection occurs to the effective month such over collection is refunded and such under collection is recouped. Customer shall not be liable for interest on net undercollections. (C)
- S<sub>t</sub> = The Company's total KWH sales to customers (excluding Company use) projected for the computation year (c), adjusted to exclude any incremental or decremental KWH sales made under Rate Schedules PR-1 and PR-2, and excluding firm sales to other utilities, the costs with respect to which are excluded from F. (C)
- S<sub>r</sub> = The Company's KWH sales to which the ECR applies projected for the computation year (c), adjusted to exclude any incremental or decremental KWH sales made under Rate Schedules PR-1 and PR-2.
- $\frac{F}{S_b}$  = Base energy costs of 17.813 mills per kilowatt-hour. (Effective 2-28-95) (I)
- T = The Pennsylvania gross receipts tax rate in effect during the billing month, expressed in decimal form.

Demand/Energy Allocation of QF Payments

Consistent with the Settlement Agreement approved by the Commission at Docket No. M-00930406, the Company will allocate the estimated amount of its payments for output purchased from qualifying facilities (QFs), recorded in Account 555, on a demand/energy basis. To develop a demand-related component for the Company's energy-only avoided cost QF payments, a proxy is calculated by using the applicable PJM Installed Capacity Deficiency Rate and the amount of QF capacity claimed for PJM installed capacity accounting purposes. This proxy demand-related component will be allocated on a demand basis. The remaining portion (energy-related component) of QF payments will be allocated on an energy basis.

- A = The Pennsylvania jurisdictional portion (95.70%) of the amount of QF capacity claimed for PJM installed capacity accounting purposes in the ECR period multiplied by the applicable PJM Installed Capacity Deficiency Rate times 365.
- D = Demand Allocation Factors
  - D<sub>1</sub> = 40.21% for Rate Schedules RS, RTS, and RTD (Residential customer group).
  - D<sub>2</sub> = 30.62% for Rate Schedules GS-1, GS-3, GH-1, GH-2, BL, IS-1, SA, SM, SHS, SE, TS, and SI-1 (General Service customer group).
  - D<sub>3</sub> = 13.03% for Rate Schedule LP-4 (LP-4 customer group).
  - D<sub>4</sub> = 16.14% for Rate Schedules LP-5, LP-6 and LPEP, and Interruptible Service by Agreement contracts (LP-5 customer group).

(I) Indicates Increase  
 (C) Indicates Change

STATE TAX ADJUSTMENT SURCHARGE

(C) (I)

In addition to the charges and credits provided for in this tariff, except for charges or credits applied under the Energy Cost Rate, and except for charges or credits under Rate Schedules PR-1 and PR-2 for incremental or decremental kilowatt-hour usage, a surcharge of 0.00% will be charged for all service rendered on and after February 28, 1995.

The State Tax Adjustment Surcharge will be recomputed using the elements prescribed by the Commission in its regulations at 52 Pa. Code §69.51, et seq.:

- on March 21, 1995, and each year thereafter until the surcharge is rolled into base rates, and
- whenever the Company experiences a material change in any of the taxes used in calculation of the surcharge due to a change in the applicable tax rates or in the basis of calculating such tax rates.

The recalculation will be submitted to the Commission within 10 days after the occurrence of the event which occasions such recomputation. If the recomputed surcharge is less than the one in effect, the utility will, or if the recomputed surcharge is more than the one in effect the utility may, submit with such recomputation a tariff or supplement to reflect such recomputed surcharge. The effective date of such tariff or supplement shall be 10 days after filing. Any charges or credits in the surcharge shall be rolled into base rates in the Company's next base rate proceeding.

---

**SPECIAL BASE RATE CREDIT ADJUSTMENT**

The Special Base Rate Credit Adjustment will reduce all charges for services under this tariff, except charges or credits applied under the Energy Cost Rate, the State Tax Adjustment Surcharge, the Industrial Development Initiatives Rider, and the Economic Development Initiatives Rider, and except for charges or credits under Rate Schedules PR-1 and PR-2 for incremental and decremental kilowatt-hour usage. The Special Base Rate Credit Adjustment is composed of the Power Plant Spare Parts Inventory Credit, and the GE Settlement Credit. For service rendered on and after February 28, 1995, the Special Base Rate Credit Adjustment will reduce applicable charges by 1.66%. (C)(I)

**POWER PLANT SPARE PARTS INVENTORY CREDIT**

This credit reflects the impact of a change in the method of accounting for spare parts at the Company's power plants.

Beginning on April 1, 1992, this credit will be 1.07%. This credit is being returned to customers over approximately a five-year period (April 1, 1991 through March 30, 1996). The Special Base Rate Credit Adjustment may be modified in the final months of applicability of the Power Plant Spare Parts Inventory Credit component to effectuate a complete return of this credit.

When the credit is completely returned, the Power Plant Spare Parts Inventory Credit component will be 0.00%. (C)

**GE SETTLEMENT CREDIT**

This credit reflects the impact of a settlement agreement between the Company and the General Electric Company (GE).

Beginning April 1, 1992, this credit will be 0.59%. This credit will be returned to customers over approximately a five-year period (April 1, 1992 through March 30, 1997). The Special Base Rate Credit Adjustment may be modified in the final months of applicability of the GE Settlement Credit component to effectuate a complete return of this credit.

When the credit is completely returned, the GE Settlement Credit component will be 0.00%.

**RATE SCHEDULE LPEP  
POWER SERVICE TO ELECTRIC PROPULSION**

**APPLICATION RATE SCHEDULE**

This rate schedule is available for electric propulsion service from the Company's high voltage lines of 69,000 volts or higher, when the customer furnishes and maintains all equipment necessary to transform the energy from line voltage.

**NET MONTHLY RATE (Effective 2-28-95)**

(C) (1)

\$6.00 per kilowatt for all kilowatts for the Billing KW.

5.60 cts. per KWH for the first 1,200,000 KWH.

5.30 cts. per KWH for the next 250 KWH per kilowatt of the Billing KW.

3.60 cts. per KWH for all additional KWH.

A credit of \$0.85 is applied to the Billing KW when the Company does not utilize its 69,000 volt or 138,000 volt "3 phase" facilities to provide service to the customer.

The Energy Cost Rate applies to all KWH supplied under this rate.

The Minimum Billing Demand is 20,000 KW.

Net Monthly Rate minimum is \$120,000.00.

**FACILITY CHARGE**

In addition to the above charges, the customer pays the Company \$3,418.00 per month for use of the Company's 25 Hertz facilities.

(D)

**BILLING KW**

The Billing KW is the average of the weekly demands supplied during the one-hour period of maximum use during the current billing period.

Time-of-day metering and billing is available on request for an additional charge of \$15.00 per month for a minimum period of one year. The Billing KW is the average of the weekly demands supplied during the one-hour period of maximum use during the on-peak hours of the current billing period.

(I)

**ON-PEAK HOURS**

On-peak hours for billing purposes are 7 a.m. to 3 p.m., 8 a.m. to 4 p.m., or 9 a.m. to 5 p.m. local time, at the option of the customer, Mondays to Fridays inclusive except New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. The Company's system on-peak period is 7 a.m. to 9 p.m. local time.

**DEMAND FREE DAYS (EXPERIMENTAL)**

A customer taking service under this rate schedule having a monthly maximum demand of 5,000 KW or greater is eligible for Demand Free days. An eligible customer may pre-select three (3) weekdays per week, from Tuesday through Friday, as Demand Free. The demand created by the customer on the pre-selected days will not be used for billing purposes. The customer must specify annually which three weekdays per week will be Demand Free for the succeeding year. Terms and conditions for service under this provision are covered by contract. This provision will terminate on January 1, 1998.

(C)

The Company will notify the customer by 2:00 p.m. of the weekday preceding a Demand Free day if the Demand Free day is canceled. A Demand Free day will not be canceled by the Company unless the incremental cost to carry the Company's system load is greater than the sum of the trailing block energy rate under this schedule and the Energy Cost Rate, or the local distribution system has insufficient capacity to meet the expected load.

**SPECIAL BASE RATE CREDIT ADJUSTMENT**

The Special Base Rate Credit Adjustment included in this Tariff is applied to charges under this rate except for charges made under the Energy Cost Rate and charges made under the State Tax Adjustment Surcharge.

(C) Indicates Change  
(D) Indicates Decrease  
(I) Indicates Increase

ORIGINAL

KJR

**DRENNAN & ASSOCIATES**

CHARTERED

1216 16TH STREET, N.W.  
WASHINGTON, D.C. 20036

202-835-2600

FACSIMILE 202-835-0452

January 10, 1995

VIA FEDERAL EXPRESS

John G. Alford, Esq.  
Secretary  
Pennsylvania Public Utility Commission  
Post Office Box 3265  
North Office Building  
Harrisburg, Pennsylvania 17120

RECEIVED  
JAN 10 1995

SECRETARY'S OFFICE  
Public Utility Commission

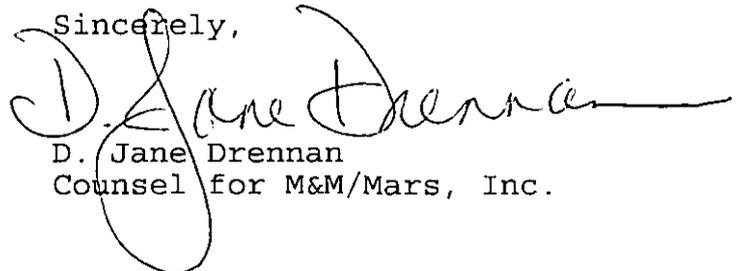
Re: Application of Pennsylvania Power and Light Company for  
Authority to Change Rates, Docket No. R-00943271

Dear Mr. Alford:

Enclosed herewith are an original and 2 copies of M&M/Mars, Inc.'s Protest and Motion to Intervene in the above-referenced proceeding. Please stamp the two additional copies "filed" and return them in the enclosed self-addressed, stamped envelope.

Please call me if you have any questions about this filing.

Sincerely,

  
D. Jane Drennan  
Counsel for M&M/Mars, Inc.

Enclosures

DOCUMENT  
FOLDER

ORIGINAL

RECEIVED  
JAN 10 1995

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Pennsylvania )  
Power and Light Company for )  
Authority to Change Rates )

SECRETARY'S OFFICE  
Public Utility Commission  
Docket No. R-00943271

PROTEST OF M&M/MARS, INC. AND MOTION FOR  
LEAVE TO INTERVENE

Pursuant to Title 52, Section 5.51 of the Pennsylvania Code, M&M/Mars, Inc. ("M&M/Mars") hereby protests Pennsylvania Power & Light Company's ("PP&L") December 30, 1994 application with the Pennsylvania Public Utility Commission ("PPUC") for an electric rate increase and requests leave to intervene in the above-captioned proceeding pursuant to Title 52, Section 5.71 of the Pennsylvania Code, and to have all the rights of a party to the proceeding.

In support of its Protest and Motion for Leave to Intervene, M&M/Mars states as follows:

1. M&M/Mars owns and operates a confectionery manufacturing plant in Elizabethtown, Pennsylvania. Its business address and telephone number are:

M&M/Mars Inc.  
Brown Street  
Elizabethtown, Pennsylvania 17022  
Telephone: (717) 367-1500

DOCKETED

JAN 13 1995

2. M&M/Mars purchases electric power from PP&L under Rate Schedule LP-5 for large general service. In its application to increase its rates filed on December 30, 1994, PP&L requested a 9.1% increase in its LP-5 rates under which the M&M/Mars plant is

DOCUMENT  
FOLDER

served. The rate increase will have a negative cost impact on the Elizabethtown M&M/Mars operations. M&M/Mars therefore has a justiciable interest in the outcome of this proceeding.

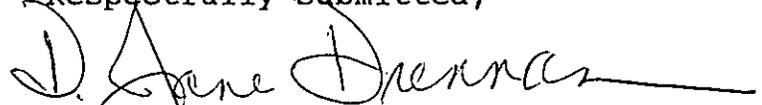
3. As a purchaser of electricity from PP&L, M&M/Mars has a direct and material interest in this proceeding. No other party can adequately represent M&M/Mars' interest.

4. All communications and notices regarding this proceeding should be served on:

D. Jane Drennan, Esq.  
Sarah E. Tomalty, Esq.  
Drennan & Associates  
1216 16th Street, N.W.  
Washington, D.C. 20036  
Telephone: (202) 835-2600  
Facsimile: (202) 835-0452

WHEREFORE, for the reasons stated above, M&M/Mars, Inc. protests Pennsylvania Power & Light Company's December 30, 1994 application with the Pennsylvania Public Utility Commission for an electric rate increase and requests intervention as a party in the above-captioned proceeding with all rights appropriate to that status.

Respectfully submitted,



D. Jane Drennan  
Sarah E. Tomalty  
Drennan & Associates  
1216 16th Street, N.W.  
Washington, D.C. 20036  
202/835-2600

Dated: January 10, 1995

AFFIDAVIT

Sarah E. Tomalty being duly sworn according to the law, deposes and says that the facts above set forth are true and correct to the best of her knowledge, information and belief and she expects to be able to prove the same at any hearing hereof.

Sarah E. Tomalty  
Sarah E. Tomalty

Sworn and subscribed before me this 10th day of January, 1995.

Elaine Webb  
Notary public

My commission expires  
5/31/95.

I hereby certify that I have this day served a true copy of the foregoing document upon the participant, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant).

Paul E. Russell  
Pennsylvania Power and Light Company  
Two North Ninth Street  
Allentown, Pennsylvania 18101-1179

Dated this 10th day of January, 1995.

  
Sarah E. Tomalty

Counsel for  
M&M/Mars, Inc.

MCNEES, WALLACE & NURICK  
ATTORNEYS AT LAW

KJR

BRIAN M. ADDISON  
BRUCE D. BAGLEY  
TERRY R. BOSSERT  
ALAN R. BOYNTON, JR.  
ERIC L. BROSSMAN  
ROBERT M. CHERRY  
WILLIAM A. CHESNUTT  
DAVID B. DISNEY  
MICHAEL A. DOCTROW  
ELIZABETH A. DOUGHERTY  
HARVEY FRIEDENBERG  
JAMES L. FRITZ  
FRANCIS B. HAAS, JR.  
W. JEFFRY JAMOUNEAU  
MICHAEL G. JARMAN  
DAVID M. KLEPPINGER  
BERNARD A. LABUSKES, JR.

DELANO M. LANTZ  
RICHARD R. LEFEVER  
DAVID E. LEHMAN  
CLYDE W. MCINTYRE  
FRANKLIN A. MILES, JR.  
ROBERT A. MILLS  
STEPHEN A. MOORE  
HERBERT R. NURICK  
JOHN S. OYLER  
TIMOTHY J. PFISTER  
GARY A. RITTER  
EDWARD W. ROTHMAN  
DANA STEVENS SCADUTO  
S. BERNE SMITH  
ROBERT D. STEIS  
RICHARD W. STEVENSON  
DIANE M. TOKARSKY

100 PINE STREET  
P. O. BOX 1166  
HARRISBURG, PA 17108-1166  
TELEPHONE (717) 232-8000  
FAX (717) 237-5300  
OF COUNSEL  
ROBERT H. GRISWOLD  
SAMUEL A. SCHRECKENGAUST, JR.

DAVID M. WATTS, JR.  
STEVEN J. WEINGARTEN  
NEAL S. WEST  
NORMAN I. WHITE  
GARY F. YENKOWSKI  
WILLIAM M. YOUNG, JR.  
ERIC N. ATHEY  
JONATHAN C. BERRY  
BRETT D. DAVIS  
JAMES P. DIANGELO  
JAMES P. DOUGHERTY  
KATHLEEN A. DUNST  
ROBERT J. GODUTO  
SCOTT A. GOULD  
P. NICHOLAS GUARNESCHELLI

ROBERT G. HAAS  
BRIAN F. JACKSON  
DONALD B. KAUFMAN  
MICHAEL R. KELLEY  
PETER F. KRIETE  
JAMES W. KUTZ  
CAMILLE C. MARION  
PATRICK J. MURPHY  
SHARON R. PAXTON  
CHUONG H. PHAM  
JONATHAN H. RUDD  
CAROL A. STEINOUR  
CATHERINE E. WALTERS  
LAWRENCE R. WIEDER  
DERRICK P. WILLIAMSON

January 18, 1995

Mr. John G. Alford, Secretary  
PA Public Utility Commission  
B-20 North Office Building  
P. O. Box 3265  
Harrisburg, PA 17120

VIA HAND DELIVERY

RECEIVED  
JAN 18 PM 1:52  
PA. P. U. C.  
INFO. CONTROL DIV.

In Re: Pennsylvania Public Utility Commission, et al  
v. Pennsylvania Power & Light Company  
Docket No. R-00943271

Dear Secretary Alford:

Enclosed please find an original and two (2) copies of the Complaint of Lehigh Valley Power Committee in the above-captioned proceeding.

As evidenced by the attached Certificate of Service, all parties of record have been duly served.

Please date stamp a copy of this transmittal letter and kindly return for our filing purposes.

Very truly yours,

MCNEES WALLACE & NURICK

By *David M. Kleppinger*  
David M. Kleppinger

DMK/gm  
Enclosures  
c: Certificate of Service

R-00943271C0012  
110500

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION, ET AL.

v.

PENNSYLVANIA POWER & LIGHT  
COMPANY

:  
:  
:  
:  
:  
:  
:

DOCKET NO. R-00943271

COMPLAINT

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

1. The Complainants are Lehigh Valley Power Committee ("LVPC"), which for purposes of this proceeding includes:

- Appleton Papers Inc.
- Armstrong World Industries, Inc.
- BOC Gases
- ESSROC Materials, Inc.
- Hercules Cement Company
- Hershey Foods Corporation
- Horsehead Resource Development Co., Inc.
- Lafarge Whitehall Cement
- Liquid Carbonic Industries
- Lone Star Industries
- Praxair, Inc.
- R. R. Donnelley & Sons Company
- Thomson Consumer Electronics, Inc.
- Victaulic Company of America

RECEIVED  
95 JAN 18 PM 1:53  
PA. P. U. C.  
INFO. CONTROL DIV.

The composition of LVPC at this point in time is attached hereto as Appendix "A" and will be updated as additional members join LVPC.

2. The names and address of the Complainants' attorneys are:

David M. Kleppinger  
James P. Dougherty  
Derrick P. Williamson  
McNEES WALLACE & NURICK  
100 Pine Street  
P. O. Box 1166  
Harrisburg, PA 17108-1166  
(717) 237-5214

3. Respondent utility is:

Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101

4. This Complaint is directed against the rates, terms and provisions contained in Respondent's Supplement No. 50 to Tariff Electric Pa. P.U.C. No. 200, issued December 30, 1994, and proposed to become effective on February 28, 1995. By this filing, Pennsylvania Power & Light Company ("PP&L" or "Company") is requesting a \$261 million, or 11.7%, increase in its annual base rate revenues.

5. LVPC is an ad hoc association of energy-intensive industrial customers receiving firm and interruptible service primarily under PP&L's existing Rate Schedule LP-5 and various riders and related tariffs. The cost of electric utility service is a significant element in LVPC members' cost of operation. The proposed rate increase and tariff changes may have a significant adverse effect on LVPC members. Therefore, LVPC members have an interest in this proceeding that is not represented by any other party of record.

6. LVPC alleges that the information and data filed in support of the proposed rate increase and tariff changes in Supplement No. 50 to Tariff Electric Pa. P.U.C. No. 200 are insufficient to establish that the rates are just, reasonable and nondiscriminatory, as required by Sections 1301 and 1304 of the Public Utility Code, 66 Pa.C.S. §§1301 and 1304.

7. LVPC's preliminary review indicates the need for Commission investigation into numerous issues. The issues of primary, but not exclusive, concern to LVPC include:

- (a) The proposed distribution of the increase among customer classes;
- (b) The appropriate cost of service study methodology, including the issues of treatment of interruptible load and allocation of demand-related costs;
- (c) The design of the new Rate Schedule LP-6;
- (d) The design of, and proposed changes to, Rate Schedule LP-5;
- (e) The design of, and proposed changes to, interruptible rate provisions;
- (f) The requested return on common equity of 13% and overall rate of return of 10.17%;
- (g) The fossil fuel decommissioning fund and nuclear plant decommissioning fund;
- (h) The \$61 million depreciation expense claim;
- (i) Energy Cost Rate revisions and the Capacity and Energy Sales Agreement with Jersey Central Power & Light Company; and
- (j) The appropriate ratemaking recovery of costs associated with Statement of Financial Accounting Standards No. 106;

- (k) Excess capacity;
- (l) Social program expenditures and allocations;
- (m) Amortization of early window deferrals; and
- (n) Environmental remediation expense claim.

Complainants reserve the right to raise and address other issues of concern during the course of the proceeding.

8. The relief sought by this Complaint is that:

(a) the Commission entertain this Complaint and allow Complainants to intervene in this proceeding with full party status;

(b) the Commission institute an investigation into the proposed rate increase and tariff changes contained in PP&L's Supplement No. 50 to Tariff Electric Pa. P.U.C. No. 200, and suspend the Supplement for a period not longer than seven (7) months from the proposed effective date of February 28, 1995, pursuant to Section 1308(d) of the Public Utility Code, 66 Pa.C.S. §1308(d);

(c) consolidate LVPC's Complaint with its investigation into the reasonableness and lawfulness of the proposed rates, terms and provisions in PP&L's rate filing, and allow LVPC to participate fully as such in the proceeding; and

(d) PP&L be required at hearing to adduce evidence in justification of its proposed rate increase and tariff

revisions, and that LVPC be accorded full opportunity to cross-examine the Company's witnesses, present evidence and offer argument on their own behalf.

**WHEREFORE**, LVPC requests that PP&L be required to answer this Complaint and that upon a final hearing, the Commission will make such order as it deems necessary.

Respectfully submitted,

McNEES WALLACE & NURICK

By



David M. Kleppinger  
James P. Dougherty  
Derrick P. Williamson  
100 Pine Street  
P. O. Box 1166  
Harrisburg, PA 17108-1166  
(717) 237-5214

Counsel for Lehigh Valley Power  
Committee

Dated: January 18, 1995



MEMBERS OF LEHIGH VALLEY POWER COMMITTEE

Appleton Papers Inc.  
Armstrong World Industries, Inc.  
BOC Gases  
ESSROC Materials, Inc.  
Hercules Cement Company  
Hershey Foods Corporation  
Horsehead Resource Development Co., Inc.  
Lafarge Whitehall Cement  
Liquid Carbonic Industries  
Lone Star Industries  
Praxair, Inc.  
R. R. Donnelley & Sons Company  
Thomson Consumer Electronics, Inc.  
Victaulic Company of America

APPENDIX "A"

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Complaint on all known parties of record to this proceeding, by First Class Mail, addressed as follows:

Paul E. Russell, Esquire  
Associate General Counsel  
Pennsylvania Power & Light Co.  
Two North Ninth Street  
Allentown, PA 18101-1179

Charles F. Hoffman, Esq.  
Office of Trial Staff  
PA Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

Irwin A. Popowsky, Esq.  
Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Bernard A. Ryan, Jr., Esq.  
Small Business Advocate  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101

  
David M. Kleppinger

Dated this 18th day of January, 1995, in Harrisburg, PA.

**Commonwealth of Pennsylvania**

**Pennsylvania Public Utility Commission  
PO Box 3265, Harrisburg, PA 17105-3265**

January 20, 1995

KJR

In Re: **R-00943271,  
R-00943271C0001-C0002**

(See attached list)

**DOCKETED**

**JAN 26 1995**

**Pennsylvania Public Utility Commission  
v.  
Pennsylvania Power and Light Company**

Investigation into a proposed \$261,000,000 annual rate increase.

**NOTICE**

This is to inform you that a Prehearing Conference on the above-captioned case will be held Tuesday, March 7, 1995, at 10:00 a.m. in an available hearing room, Ground Floor, North Office Building, North Street and Commonwealth Avenue, Harrisburg, Pennsylvania.

In an effort to expedite the future conduct and disposition of this proceeding, we are attaching a list of information you are expected to bring with you to this conference.

The presiding officer in this proceeding is Administrative Law Judge Michael C. Schnierle. Judge Schnierle can be contacted at PO Box 3265, Harrisburg, Pennsylvania 17105-3265; telephone (717) 783-5452.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired: 1-800-654-5984

pc: Judge Schnierle  
 Kevin Cadden - BPL - Rm. 111  
 John Frazier - BPL - Rm. 101  
 Office of Trial Staff (4)  
 Law Bureau  
 Consumer Advocate  
 Small Business Advocate  
 Gail Miller - Rm. 118  
 William Barrett  
 Norma Lewis  
 Judy Weaver, Scheduling Officer  
 Robert Stewart  
 Beth Plantz  
 Docket Section

Certified Mail  
 Receipt Requested &  
 Reg. Mail to Complainant

**DOCUMENT  
 FOLDER**

**RECEIVED**  
 95 JAN 23 PM 1:33  
 PA. P. U. C. INFO. CONTROL DIV.

943271, R-00943271C0001-C0002 Pennsylvania Public Utility Commission v.  
Pennsylvania Power and Light Company

Investigation into a proposed \$261,000,000 annual rate increase.

JOHNNIE E SIMMS ESQUIRE  
PA PUC - OFFICE OF TRIAL STAFF  
PITNICK BUILDING - 3RD FLOOR  
901 NORTH 7TH STREET  
HARRISBURG PA 17101

KENNETH L MICKENS ESQUIRE  
PA PUC - OFFICE OF TRIAL STAFF  
PITNICK BUILDING - 3RD FLOOR  
901 NORTH 7TH STREET  
HARRISBURG PA 17101

STEPHEN GORKA ESQUIRE  
PA PUC - OFFICE OF TRIAL STAFF  
PITNICK BUILDING - 3RD FLOOR  
901 NORTH 7TH STREET  
HARRISBURG PA 17101

TANYA J MCCROSKEY ESQUIRE  
OFFICE OF CONSUMER ADVOCATE  
1425 STRAWBERRY SQUARE  
HARRISBURG PA 17120

PAUL E RUSSELL ESQUIRE  
PENNSYLVANIA POWER AND LIGHT  
2 NORTH NINTH STREET  
ALLENTOWN PA 18101-1179

D JANE DRENNAN ESQUIRE  
1216 16TH STREET NORTHWEST  
WASHINGTON PA 20036  
(Representing M&M/Mars, Inc.)

GARY M BOOTAY  
KIMBERLEY MEADOWS  
6 MANOR DRIVE  
MECHANICSBURG PA 17055  
(C0001)

VICKIE MACKIN  
% CONCERNED CITIZENS OF  
SCHUYLKILL COUNTY INC  
PO BOX 37  
MCADOO PA 18237  
(C0002)

**SCHNADER, HARRISON, SEGAL & LEWIS**

ORIGINAL

ATTORNEYS AT LAW

SUITE 3600

1600 MARKET STREET

PHILADELPHIA, PENNSYLVANIA 19103-4252

215-751-2000  
FAX 215-751-2205

KJR

RECEIVED  
95 JAN 26 AM 8:33  
PA. P. U. C.  
INFO. CONTROL DIV.

DIRECT DIAL NUMBER

(215) 751-2278

January 24, 1995

Mr. John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
Room B-20, North Office Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265

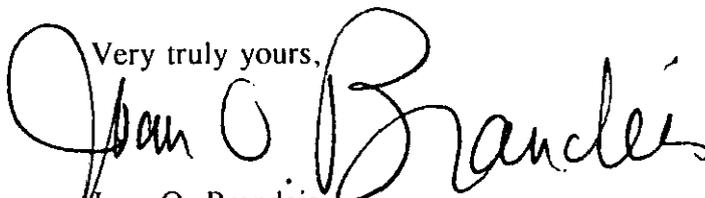
**Re: Pennsylvania Public Utility Commission v. Pennsylvania Power & Light  
Company: Docket No. R-00943271**

Dear Secretary Alford:

Enclosed please find an original and three copies of a Petition to Intervene  
being filed on behalf of Bethlehem Steel Corporation, Petitioner.

Copies of this letter have been served on all parties of record as shown on the  
Certificate of Service attached.

Very truly yours,



Joan O. Brandeis  
For SCHNADER, HARRISON, SEGAL & LEWIS  
Attorneys for Bethlehem Steel Corporation

Enclosures

cc: All Parties of Record

DOCUMENT  
FOLDER 1

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION

vs.

PENNSYLVANIA POWER & LIGHT  
COMPANY

DOCKET NO. R-00943271

RECEIVED  
95 JAN 26 AM 8:33  
PA. P.U.C.  
INFO. CONTROL DIV.

---

PETITION TO INTERVENE

---

Bethlehem Steel Corporation ("Petitioner"), by its attorney, hereby files this  
Petition to Intervene in the above-captioned matter pursuant to 52 Pa. Code Section 5.71 et  
seq. and in support thereof avers as follows:

1. The name and address of Petitioner is:

Bethlehem Steel Corporation  
Martin Tower  
8th and Eaton Avenues  
Bethlehem, Pennsylvania 18016.

2. Petitioner's attorney, upon whom all documents should be served is:

Joan O. Brandeis, Esquire  
Schnader, Harrison, Segal & Lewis  
Suite 3600  
1600 Market Street  
Philadelphia, Pennsylvania 19103.

**DOCKETED**  
FEB 01 1995

DOCUMENT  
FOLDER

3. On December 30, 1994, Pennsylvania Power & Light Company ("PP&L") filed Supplement No. 50 to PP&L's Tariff Electric-Pa. P.U.C. No. 200 ("Supplement No. 50").

4. In Supplement No. 50, PP&L seeks a \$261 million dollar increase in its annual base rate revenues.

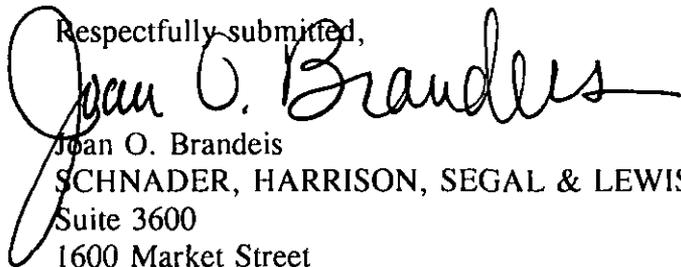
5. Petitioner is a manufacturer of steel and steel products. Its world headquarters is located in Bethlehem, Pennsylvania. Petitioner operates two large steel plants in PP&L's service territory, and is among PP&L's largest customers.

6. Petitioner will be directly affected and bound by a decision in this proceeding without an opportunity to be heard if this Petition to Intervene is not granted.

7. Petitioner's interests will not be adequately represented by existing participants in the proceeding.

WHEREFORE, Petitioner respectfully requests that its Petition to Intervene be granted.

Respectfully submitted,



Joan O. Brandeis  
SCHNADER, HARRISON, SEGAL & LEWIS  
Suite 3600  
1600 Market Street  
Philadelphia, Pennsylvania 10103  
Attorneys for Petitioner

Dated: January 24, 1995

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION, et al.

v.

PENNSYLVANIA POWER & LIGHT  
COMPANY

:  
:  
: DOCKET NO: R-00943271  
:  
:  
:

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing document either by hand delivery,  
by facsimile, first class mail and/or overnight express mail upon the persons listed below:

Johnnie Simms, Esquire  
Kenneth Mickens, Esquire  
PA PUC - Office of Trial Staff  
Pitnick Building - 3rd Floor  
901 North 7th Street  
Harrisburg, PA 17102  
Phone: 717-787-1976

Irwin A. Popowsky, Consumer Advocate  
Mary C. Kenney, Asst. Consumer Advocate  
Office of the Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120  
Phone: 717-783-8048  
Fax: 717-783-7152

Bernard A. Ryan, Esquire  
Office of Small Business Advocate  
Suite 1102 Commerce Building  
300 North Second Street  
Harrisburg, PA 17101  
Phone: 717-783-1515  
Fax: 717-783-2831

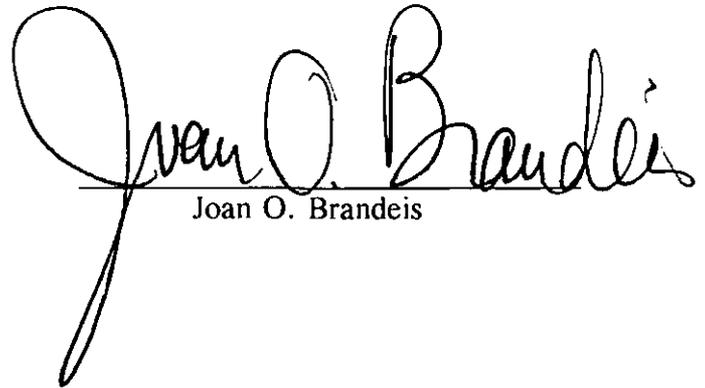
David M. Kleppinger, Esquire  
McNees, Wallace and Nurick  
100 Pine Street, Box 1166  
Harrisburg, PA 17108-1166  
Phone: 717-237-5214  
Fax: 717-236-2665

Paul E. Russell, Esquire  
Pennsylvania Power & Light  
2 North 9th Street  
Allentown, PA 19101-1179

D. Jane Drennan, Esquire  
1216 16th Street, N.W.  
Washington, PA 20036

Dated this 24th day  
January, 1995

James R. Brokenshire  
599 Eisenhower Boulevard  
Harrisburg, PA 17111-2397



Joan O. Brandeis