

FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

DOCUMENT  
FOLDER

KJR

Please Print

R-943217 C0019 ORIGINAL

RECEIVED  
PA. P. U. C.  
INFO. CONTROL DIV.  
JAN 27 PM 2:31

1. Your Name, Mailing Address and Telephone Number

Name Joel Guittard  
Street/P.O. Box RD 4 BOX 349E Apt# \_\_\_\_\_  
City LAKH ARIEL State PA Zip 18436  
County LACH. Home Telephone-Area Code (717) 689-4135  
Work Telephone-Area Code (717) 689-9225

2. Which company does your complaint concern?

Name of Company P P & L

DOCKETED

JAN 30 1995

3. What is your complaint?

I Don't understand how it cost  
MORE to produce Elect. for Residential  
or General. The cost to MAKE ONE KILOWATT  
cost the same no matter where the kilowatt  
ends up. ALSO our Gen Rate IS figured  
at different rate from Residential  
This complaint is in Ref. to the  
Energy Charge on the P P & L Bill and is  
suppose to BE A PASS ON for fuel cost.

Example ACC# 2931736550 Energy Charge .010892  
ACC# 2931736550 " " .010698

WHY?? Thank you Joel Guittard

(If you need more space use additional paper and attach to this form).

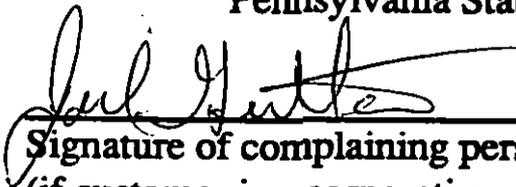
4. What do you want the Public Utility Commission to do about your complaint?

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(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

  
\_\_\_\_\_

1-18-95  
Date Signed

Signature of complaining person, or officer  
(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

~~Lawyer's Name \_\_\_\_\_  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Telephone Number-Area Code ( ) \_\_\_\_\_~~



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

DOCUMENT  
FOLDER  
IN REPLY PLEASE  
REFER TO OUR FILE

January 31, 1995

R-943271C0019

PENNSYLVANIA POWER & LIGHT  
PAUL E RUSSELL, ESQ  
TWO NORTH NINTH ST  
ALLENTOWN PA 18101-1179

KJR

A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **JOEL GUITTARD**. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20 DAYS) THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A PAYMENT SCHEDULE MAY BE PRESCRIBED OR A TERMINATION OF UTILITY SERVICES MAY BE AUTHORIZED. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

COMPANY/UTILITY

AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

lpw  
Attachment

for: John G. Alford, Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
January 31, 1995

DOCUMENT  
FOLDER

JOEL GUITTARD

Complaint Docket  
No. R-943271C0019

v.

PENNSYLVANIA POWER & LIGHT

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

DOCKETED  
JAN 30 1995

TO: PENNSYLVANIA POWER & LIGHT

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 PA CS §702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, PO Box 3265, Harrisburg, PA, 17105-3265, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 PA Code §5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 PA Code §1.56(a).

2. If you fail to either satisfy this complaint or to file an answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 PA Code §5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq.; And, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 PA CS §703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in this complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

**ORIGINAL**

February 16, 1995

**RECEIVED**  
FEB 16 1995

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

SECRETARY'S OFFICE  
Public Utility Commission

Re: **Joel Guittard v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0019**

**DOCUMENT  
FOLDER**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Joel Guittard  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joel Guittard

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0019

---

CERTIFICATION OF SERVICE

---

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Joel Guittard  
RD 4, Box 349E  
Lake Ariel, Pennsylvania 18436

Dated this 16th day of February.

  
\_\_\_\_\_  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joel Guittard

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0019

**DOCKETED**  
FEB 21 1995

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ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

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DOCUMENT  
FOLDER

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the

Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

The proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

By way of further answer, the Company's Energy Cost Rate (ECR) is in full compliance with Section 1307 of the Public Utility Code, 66 Pa. C.S. § 1307, PP&L's Tariff Electric Pa. P.U.C. No. 200 and all applicable Commission regulations and orders.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



---

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 16, 1995  
at Allentown, Pennsylvania



**FORMAL COMPLAINT FORM**  
**Pennsylvania Public Utility Commission**

KJR

R-00943271C0020  
110500

Please Print:

**ORIGINAL**

1. Your Name, Mailing Address and Telephone Number

Name TRVIN M SHAFFER

Street/P.O. Box 355 Steelstown Rd Apt#

City Newville State PA Zip 17241

County Cumberland Home Telephone-Area Code (717) 776 5156

Work Telephone-Area Code (717) 249 2011

INFO. CONTROL DIV.

95 JAN 31 AM 9:09

RECEIVED

**DOCKETED**

FEB 01 1995

2. Which company does your complaint concern?

Name of Company P.P.L

3. What is your complaint?

*I am extremely upset with the requested increase of 201 million dollars. It is ~~also~~ absurd to increase residential customers using 500 kWh - 20.7% a month. This is dollar increase / month attacks elderly & often lower income families who already have financial burdens. However, those in the medium range & high range have only 2.4% & 9.1% increase respectively. How can the PUC accept & justify these outlandish increases, especially to the fixed income population? It is difficult to understand 20.7% increase in anything, when earnings increased a mere 3.3% a year.*

**DOCUMENT FOLDER**

(If you need more space use additional paper and attach to this form).

(-over-)

15

4. What do you want the Public Utility Commission to do about your complaint?

I believe the increase should be examined & better structured in comparison with the national average of general financial increases. No where would business expect to increase revenue by 20.7% via customers expense

Maybe other alternatives are to streamline + lose dead weight as other businesses have had to do. In short, become more efficient without asking for increases at the customers expense.

If increase is needed -> increase K.W.H across the board

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

David M. Shaffer

1-28-95

Signature of complaining person, or officer

Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: February 1, 1995

R-00943271C0020

PA POWER & LIGHT COMPANY  
PAUL E RUSSELL, GEN COUNSEL  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Irvin M. Shaffer. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

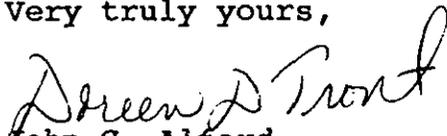
DOCUMENT  
FOLDER

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: February 1, 1995

DOCKETED  
FEB 01 1995

Irvin M. Shaffer  
Complainant

VS.

Complaint Docket  
No: R-00943271C0020

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

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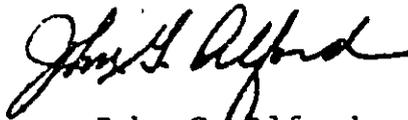
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which

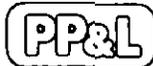
prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



Pennsylvania Power & Light Company

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

KJR

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

FAX: 610/774-6726

ORIGINAL

February 16, 1995

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

RECEIVED  
FEB 16 1995

SECRETARY'S OFFICE  
Public Utility Commission

Re: **Irvin M. Shaffer v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0020

DOCUMENT  
FOLDER

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Irvin M. Shaffer  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Irvin M. Shaffer

v.

Pennsylvania Power & Light  
Company

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Complaint Docket  
No. R-00943271C0020

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**CERTIFICATION OF SERVICE**

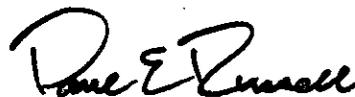
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I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Irvin M. Shaffer  
355 Steelstown Road  
Newville, Pennsylvania 17241

Dated this 16th day of February.



---

Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Irvin M. Shaffer

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0020

**DOCKETED**

FEB 21 1995

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ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

---

DOCUMENT  
FOLDER

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the Com-

pany's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

The proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

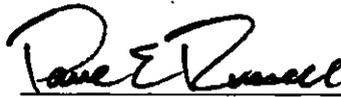
4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



---

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 16, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

KJR

R-00943271C0021  
110500.

Please Print:

ORIGINAL

95 FEB - 1 11:10:50  
PA. P. U. C.  
INFO. CONTROL DIV.

RECEIVED

1. Your Name, Mailing Address and Telephone Number

Name RICHARD & ANNA MARIE HARTZELL  
Street/P.O. Box 29 COLONIAL RD. Apt# \_\_\_\_\_  
City ALLENTOWN State PA Zip 18103  
County NORTHAMPTON Home Telephone-Area Code (610) 264-3775  
Work Telephone-Area Code ( ) \_\_\_\_\_

2. Which company does your complaint concern?

Name of Company PA POWER & LIGHT CO.

DOCKETED  
FEB 01 1995

3. What is your complaint?

WE WISH TO PREVENT THE 20% RATE INCREASE THAT  
PP & L HAS REQUESTED FOR ITS RESIDENTIAL CUSTOMERS.  
PP & L HAS DECREASED ITS WORKFORCE SUBSTANTIALLY OVER  
THE LAST SEVERAL YEARS. THE CUSTOMERS SHOULD NOT BE  
SUBJECT TO THE HARDSHIP OF MEETING THIS HUGE PROPOSED  
INCREASE SINCE WE BELIEVE WE, THE CUSTOMER ARE  
BEING USED TO PAY FOR PRE-RETIREMENT PACKAGES  
INITIATED BY THE DECREASE IN WORK FORCE.

DOCUMENT  
FOLDER

(If you need more space use additional paper and attach to this form).

4. What do you want the Public Utility Commission to do about your complaint?

DECLINE TO PASS THE PROPOSED INCREASE IN RATES TO RESIDENTIAL, AS WELL AS COMMERCIAL, CUSTOMERS AS REQUESTED BY P.P. & L.

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

Signature of complaining person, or officer (if customer is a corporation, trust or association) or member (if customer is a partnership)

1/30/95 Date Signed

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name Street City State Zip Telephone Number-Area Code ( )

RECEIVED FEB 01 1995 OFFICE OF THE PUBLIC UTILITY COMMISSION

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: February 1, 1995

R-00943271C0021

PA POWER & LIGHT COMPANY  
PAUL E RUSSELL, GEN COUNSEL  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Richard & Anna Marie Hartzell. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

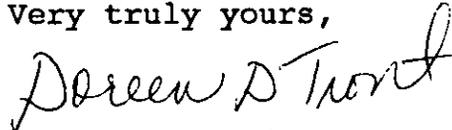
DOCUMENT  
FOLDER

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: February 1, 1995

Richard & Anna Marie Hartzell  
Complainant

VS.

Pa Power & Light Co  
Respondent

Complaint Docket  
No: R-00943271C0021

DOCKETED  
FEB 01 1995

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

DOCUMENT  
FOLDER

2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which

prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

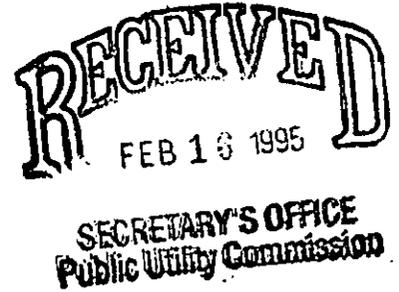
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

**ORIGINAL**

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

FAX: 610/774-6726

February 16, 1995



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

Re: **Richard & Anna Marie Hartzell v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0021

**DOCUMENT  
FOLDER**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Richard & Anna Marie Hartzell  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Richard & Anna Marie Hartzell

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0021

RECEIVED  
FEB 16 1995

SECRETARY'S OFFICE  
Public Utility Commission

---

CERTIFICATION OF SERVICE

---

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Richard & Anna Marie Hartzell  
29 Colonial Road  
Allentown, Pennsylvania 18103

Dated this 16th day of February.

  
\_\_\_\_\_  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Richard & Anna Marie Hartzell

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0021

DOCUMENT  
FOLDER

**DOCKETED**  
FEB 21 1995

ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the

Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

The proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

By way of further answer, all aspects of PP&L's Voluntary Early Retirement Program (VERP) are fully supported by the information and data submitted in the filing. As shown by this supporting information in the filing, the

VERP produces a net decrease of \$12 million in revenue requirements in the future test year.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 16, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

KJK

R-00943271C0022  
110500

Please Print:

ORIGINAL

RECEIVED  
95 FEB -2 11:10:55  
PA. P. U. C. DIV.  
INFO. CONTROL DIV.

1. Your Name, Mailing Address and Telephone Number

Name MICHAEL L. KITNER  
Street/P.O. Box 162 D ST Apt#   
City CARLISLE State PA Zip 17013  
County CUMBERLAND Home Telephone-Area Code (717) ~~258~~ 4981  
Work Telephone-Area Code (717) 249 3851

2. Which company does your complaint concern?

Name of Company PENNA POWER & LIGHT

3. What is your complaint?

REGARDING THE PROPOSED 20% RATE INCREASE  
FOR RESIDENTIAL CUSTOMERS.  
I AM NOT AWARE OF ANY OTHER ENTERPRISE  
IN THIS ECONOMY THAT CAN LEGITIMATELY ASK FOR  
AND RECEIVE SUCH A LARGE INCREASE. HOW MANY  
CARS IS CHRYSLER GOING TO SELL IF THEY  
INCREASE THE PRICE BY 20%. I'M STUCK WITH  
PP&L; ITS YOUR JOB TO PROTECT ME FROM  
OUTRALES LIKE THIS PROPOSED INCREASE!

DOCKETED  
FEB 02 1995

DOCUMENT  
FOLDER

(If you need more space use additional paper and attach to this form).

(-over-)

12

4. What do you want the Public Utility Commission to do about your complaint?

PROTECT MY INTERESTS IN THIS MATTER.

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.



JAN 29 1995

Signature of complaining person, or officer  
(if customer is a corporation, trust or association) or  
member (if customer is a partnership). Make sure the  
complaint form with your original signature is one of  
the copies you return to the Commission.

Date Signed

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: February 3, 1995

R-00943271C0022

PA POWER & LIGHT COMPANY  
PAUL E RUSSELL, GEN COUNSEL  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Michael L. Kitner. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

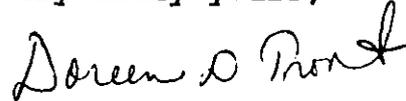
DOCUMENT  
FOLDER

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED

DATE SERVED: February 3, 1995

FEB 02 1995

Michael L. Kitner  
Complainant

VS.

Complaint Docket  
No: R-00943271C0022

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

DOCUMENT  
FOLDER

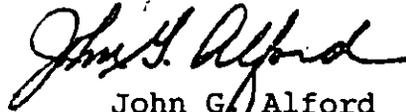
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which

prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

**ORIGINAL**

February 16, 1995

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

**RECEIVED**  
FEB 16 1995

SECRETARY'S OFFICE  
Public Utility Commission

**DOCUMENT  
FOLDER**

Re: **Michael L. Kitner v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0022

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Michael L. Kitner  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Michael L. Kitner

v.

Pennsylvania Power & Light  
Company

:  
:  
: Complaint Docket  
: No. R-00943271C0022  
:  
:  
:

---

**CERTIFICATION OF SERVICE**

---

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Michael L. Kitner  
162 D Street  
Carlisle, Pennsylvania 17013

Dated this 16th day of February.

  
\_\_\_\_\_  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Michael L. Kitner

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0022

DOCUMENT  
FOLDER

**DOCKETED**

FEB 21 1995

ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the Com-

pany's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

The proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



---

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 16, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0023  
110500

Please Print:

ORIGINAL

RECEIVED  
95 JAN 27 AM 9:08  
PA. P. U. C.  
INFO. CONTROL DIV.

1. Your Name, Mailing Address and Telephone Number

Name Mrs Harold K. Shields  
Street/P.O. Box 837 Pleasant Road Apt# \_\_\_\_\_  
City Harrisburg State PA Zip 17112  
County Dauphin Home Telephone-Area Code (717) 545-2678  
Work Telephone-Area Code ( ) RECEIVED

DOCKETED

FEB 08 1995

FEB 07 1995

2. Which company does your complaint concern?

Name of Company Pennsylvania Power & Light PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

3. What is your complaint?

DOCUMENT

A raise of 20% for P & L is unthinkable. BOLDER  
Doesn't anyone take into consideration that  
those living on a fixed income just cannot  
afford a raise like this. My house is heated  
by electric. There used to be a discount for  
electric homes but that was discontinued. All we  
got in return was a lot of added "pro electric co.  
taxes". Customer charges. Where else can we get  
electric? We can't go buy it like we can groceries,  
junk charge, energy charge. I can't figure it out why  
this company is entitled to these taxes. My December  
bill had \$2400 in taxes, my January bill shows \$2902  
in taxes. If P & L is granted this increase, it will  
amount to more like 30% when the taxes are raised

(If you need more space use additional paper and attach to this form).

123

4. What do you want the Public Utility Commission to do about your complaint?

Deny the increase. Have upper management take a decrease.

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

Ruth C. Shields Ruth C. Shields 2-4-95  
1-30-95

Signature of complaining person, or officer  
(if customer is a corporation, trust or association) or  
member (if customer is a partnership). Make sure the  
complaint form with your original signature is one of  
the copies you return to the Commission.

Date Signed

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

# ORIGINAL

R-00943271C0023

CALL BEFORE THE DUE DATE IF YOU HAVE ANY QUESTIONS - ADDITIONAL INFORMATION ON THE REVERSE SIDE

SERVICE **HAROLD K SHIELDS**  
TO: **837 PHEASANT RD**  
**HARRISBURG PA 17112**

PLEASE USE YOUR CUSTOMER NUMBER  
WHEN CALLING OR WRITING.

**514 1846 000**

\*METER NEXT READ FEB 14  
\*THANK YOU FOR YOUR PAYMENT

\* PREVIOUS BALANCE 121.09  
\* PAYMENT JAN 9 -121.09

BALANCE AS OF JAN 18 95 00

CURRENT BILLING FOR 33 DAYS USE

TO JAN 17 ACTUAL METER READING 98638  
FROM DEC 15 ACTUAL METER READING 96684  
RESIDENTIAL SERVICE RATE RS FOR 1954 KWH

128.15

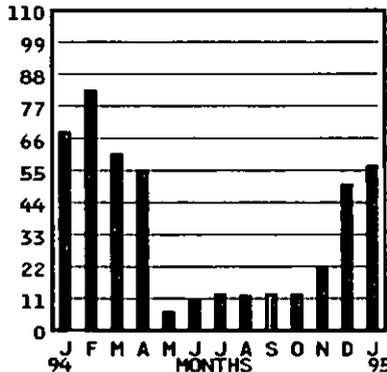
~~CUSTOMER CHARGE~~ 4.80  
SPEC BASE RATE CR ADJ AT -2.30% -3.06  
SURCHARGE FOR PA TAXES AT -0.20% -.26  
~~ENERGY CHARGE \$ .010698 PER KWH~~ 20.90  
CURRENT BILL DUE DATE FEB 8 95 150.53

*Last year same period was 179.29 (colder winter)*

ESTIMATE OF PA TAXES INCLUDED IN BILL	
TOTAL OF PA TAXES	GROSS RECEIPTS PORTION
15.05	6.62

TOTAL AMOUNT  
**150.53**

AVG KWH PER DAY



THIS IS YOUR ELECTRIC USE PROFILE - METER NUMBER 25644190

BILLING PERIOD	AVG KWH PER DAY	AVG DAILY TEMPERATURE	12 MOS ENDING KWH USE
JAN 1995	59	37 F	12552
JAN 1994	71	26 F	13336

THE METER READING FOR THE BILLING PERIOD A YEAR AGO WAS ESTIMATED. PLEASE TAKE THIS INTO CONSIDERATION WHEN MAKING YOUR COMPARISONS.

CHECK YOUR WINDOWS AND DOORS FOR TIGHTNESS. CAULKING AND WEATHER STRIPPING DOORS AND WINDOWS HELPS PREVENT COLD DRAFTS AND UNWANTED HEAT LOSS. THESE ACTIONS CAN ALSO SAVE ENERGY

WHEN YOU WANT TO CALL US, DIAL 1-800-DIAL-PPL (1-800-342-5775).

TWO NORTH NINTH STREET, ALLENTOWN, PA. 18101  
FED. I.D. 23-0959590

# ORIGINAL

R-009432710023

CALL BEFORE THE DUE DATE IF YOU HAVE ANY QUESTIONS - ADDITIONAL INFORMATION ON THE REVERSE SIDE

SERVICE **HAROLD K SHIELDS**  
TO: **837 PHEASANT RD**  
**HARRISBURG PA 17112**

PLEASE USE YOUR CUSTOMER NUMBER  
WHEN CALLING OR WRITING

**514 1846 000**

\*METER NEXT READ JAN 17  
\*THANK YOU FOR YOUR PAYMENT

\* PREVIOUS BALANCE 57.40  
\* PAYMENT DEC 6 -57.40

BALANCE AS OF DEC 16 94 0.00

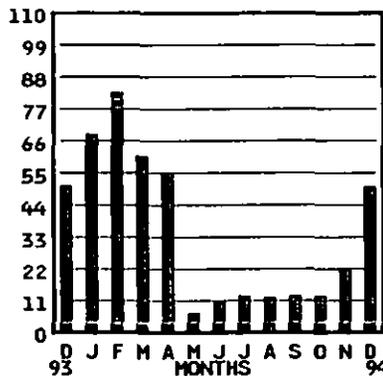
**CURRENT BILLING FOR 30 DAYS USE**

TO DEC 15	ACTUAL METER READING	96684		
FROM NOV 15	ACTUAL METER READING	95135		
RESIDENTIAL SERVICE RATE RS FOR	1549	KWH		102.40
CUSTOMER CHARGE				4.80
SPEC BASE RATE CR ADJ AT	-2.30%			-2.47
SURCHARGE FOR PA TAXES AT	-0.20%			-.21
(ENERGY CHARGE \$ .010698 PER KWH				16.57
CURRENT BILL DUE DATE	JAN 9 95			121.09

ESTIMATE OF PA TAXES INCLUDED IN BILL	
TOTAL OF PA TAXES	GROSS RECEIPTS PORTION
12.11	5.33

TOTAL AMOUNT
121.09

AVG KWH PER DAY



**THIS IS YOUR ELECTRIC USE PROFILE - METER NUMBER 25644190**

BILLING PERIOD	AVG KWH PER DAY	AVG DAILY TEMPERATURE	12 MOS ENDING KWH USE
DEC 1994	52	42 F	12933
DEC 1993	53	43 F	13201

BRIGHTEN UP THE HOLIDAYS, BUT BE SURE LIGHTS ARE IN GOOD WORKING CONDITION. DON'T OVERLOAD ELECTRICAL CIRCUITS.

WHEN YOU WANT TO CALL US, DIAL 1-800-DIAL-PPL (1-800-342-5775).

Electricity & Light Company

TWO NORTH NINTH STREET, ALLENTOWN, PA. 18101  
EFD 1.0 21.0050500

ORIGINAL

and added in. Heat is not wasted in my house, the bedrooms are not heated, door jams are covered with towels and paper is placed in the cracks around the frame. Heavy jackets are worn at all times, I'm never without heavy socks.

Just once, I would like to see the little people be considered in this case of rate increase for the big corporate giant.

Enclosed are copies of two bills. They are approximately \$3500 less than last year. That is because of the milder winter.

Very truly yours

Ruth C. Shields.  
Ruth C. Shields

RECEIVED

FEB 07 1995

PUBLIC UTILITY COMMISSION  
SECRETARYS BUREAU

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: February 8, 1995

R-00943271C0023

PA POWER & LIGHT COMPANY  
PAUL E RUSSELL, GEN COUNSEL  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Ruth C. Shields. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

DOCUMENT  
FOLDER

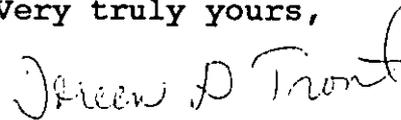
R-00943271C0023

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: February 8, 1995

Ruth C. Shields  
Complainant

VS.

Complaint Docket  
No: R-00943271C0023

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCKETED  
FEB 08 1995

TO: Pa Power & Light Co

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

DOCUMENT  
FOLDER

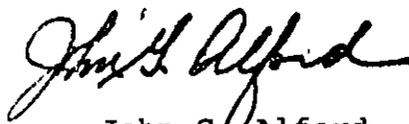
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which

prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

ORIGINAL

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

FAX: 610/774-6726

February 27, 1995

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

RECEIVED  
FEB 27 1995

SECRETARY'S OFFICE  
Public Utility Commission

Re: **Ruth C. Shields v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0023**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mrs. Ruth C. Shields  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

2-27  
1995

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Ruth C. Shields

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0023

**RECEIVED**  
FEB 27 1995

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**CERTIFICATION OF SERVICE**

---

SECRETARY'S OFFICE  
Public Utility Commission

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mrs. Ruth C. Shields  
837 Pheasant Road  
Harrisburg, Pennsylvania 17112

Dated this 27th day of February.



---

Paul E. Russell

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Ruth C. Shields

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0023

**RECEIVED**  
FEB 27 1995

SECRETARY'S OFFICE  
Public Utility Commission

---

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Admitted in part, denied in part. It is admitted that from 1961

through January 30, 1981, PP&L offered a special rate, designated Rate RH, to qualifying all-electric homes. All other allegations are denied.

By way of further answer, on May 12, 1971, the Commission issued a Secretarial Letter at Docket No. C-19244 approving the Company's request to limit the application of Rate RH to locations then presently served under the rate

DOCUMENT  
- 1 - FOLDER

**DOCKETED**  
MAR 07 1995

and to locations connected prior to February 1, 1972. On January 30, 1981, the Commission entered an order at Docket No. R-80031114, approving the Company's request to merge Rate RH into Rate RS, the general rate for service to residential customers. All customers were notified of both changes through individual customer bill inserts.

By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data

submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

By way of further answer, the taxes reflected in PP&L's charges to customers are a necessary cost of providing electric service; the amounts reflected in PP&L's charges to customers are consistent with all applicable provisions of the Public Utility Code, PP&L's Tariff Electric Pa. P.U.C. No. 200, and all applicable regulations and orders of the Public Utility Commission.

PP&L does not have sufficient knowledge or information to respond to Complainant's statements regarding her personal finances.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0024  
110500

RECEIVED  
95 FEB -6 PM 12:06  
PA. P. U. C.  
INFO. CONTROL DIV.

ORIGINAL

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name Eric Epstein  
Street/P.O. Box 2308 Brandywine Dr Apt#  
City Harrisburg State PA Zip 17110  
County DAUPHIN Home Telephone-Area Code (717) 540-5773  
Work Telephone-Area Code (717) 238-7318

2. Which company does your complaint concern?

Name of Company Pennsylvania Power & Light

3. What is your complaint?

See enclosure.

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FEB 08 1995

DOCUMENT  
FOLDER

(If you need more space use additional paper and attach to this form).

4. What do you want the Public Utility Commission to do about your complaint?

See enclosure

Multiple horizontal lines for writing the complaint details.

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

*[Handwritten Signature]*

2/5/95

Signature of complaining person, or officer (if customer is a corporation, trust or association) or member (if customer is a partnership)

Date Signed

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name NA

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

ORIGINAL

R-60943271C0024

3. What is your complaint?

**Response:** A substantial portion of Pennsylvania Power and Light Company's (PP&L) proposed rate increase, i.e. \$221 million is linked, or attributable to nuclear power plant construction, depreciation and decommissioning costs at the Susquehanna facility. These costs, as well as a full rate of return for the Susquehanna nuclear generating station constitute an unreasonable financial burden on an investment that has provided unreliable and uneconomical service to rate payers.\* Therefore, all nuclear related rate request increases should be disallowed.

\*Information to substantiate this complaint has already been prepared and is available upon request.

4) What do you want the Public Utility Commission to do about your complaint?

**Response:** Before any rate increase is approved, the following issues need to be addressed:

I) Establish criteria to limit and/or index operating and maintenance (O&M) rate increases for the Susquehanna nuclear generating station not to exceed O&M costs at PP&L's coal generating stations;

II) When factoring the cost of a KWH of electricity produced by the Susquehanna nuclear generating station, include the cost of nuclear waste disposal, contribution to the Price-Anderson fund, nuclear dismantlement and decommissioning and non-radiological decontamination and decommissioning charges;

III) Establish the cost of non-radiological decontamination and decommissioning at the Susquehanna nuclear generating station and for restoring the site to Greenfield;

IV) Establish a cap on the amount of nuclear decommissioning costs paid by the rate payer. PPL's current estimate of \$725 million is based on 1993 dollars even though the licenses for Susquehanna Units-1 and -2 do not expire until 2022 and 2024 respectively (Annual Report, Pennsylvania Power & Light, 6. "Nuclear Decommissioning Costs, p.34.). This **target** amount has fluctuated wildly (See PP&L Annual Reports) and is **not the projected final cost** for decontaminating and decommissioning the Susquehanna nuclear generating station;

V) Order PP&L to provide an explanation as to why the cost to decommission similar sized, General Electric boiling waters reactors, i.e. PECO Energy's Limerick (2110 MWe) and Peach Bottom (2,200 MWe), "is \$643 million expressed in 1990 dollars, which the company believes would be substantially unchanged by December 31, 1993" (Annual Report, PECO Energy, "Nuclear Decommissioning and Spent Fuel Storage," p.27), while the cost to decommission Susquehanna 2,070 MWe exceeds PECO's estimate by \$82 million;

ORIGINAL

R-00943271C0024

**VI)** Secure an assurance from the utility that future rate payers, i.e. after the year 2022 for Unit-1 and 2024 for Unit-2, (who will not receive any benefit from the plant), are not burdened by any expenses once the Susquehanna nuclear generating station ceases to provide electricity to rate payers. These expenses, which would constitute gross rate payer inequity, include nuclear waste disposal, nuclear dismantlement and decommissioning, non-radiological decontamination and decommissioning and any other environmental remediation expense caused by nuclear power production;

**VII)** Mandate PP&L provide a decommissioning plan **approved** by the Nuclear Regulatory Commission (NRC) before any additional decontamination decommissioning expenses are collected. Pennsylvania Power & Light's "most recent site specific decommissioning study, based on immediate dismantlement and decommissioning each unit following final shut down..." (1993 Annual Report, Pennsylvania Power & Light Company, 6. "Nuclear Decommissioning Costs," p.34) has **not** been approved by the NRC, is unrealistic in light of the experience of other permanently shut down reactors and does not make any contingencies for the NRC's delayed mode of decommissioning, i.e SAFSTOR;

**VIII)** Conduct an independent investigation into charges filed by two PP&L engineers that Susquehanna nuclear station's radioactive spent fuel pools are unsafe and that if emergency cooling systems fail, a meltdown of spent fuel elements could occur;

I respectfully request the Public Utility Commission to dismiss any and all expenses linked to nuclear power production until the above stated issues are resolved.



Eric Epstein  
2308 Brandywine Drive  
Harrisburg, PA 17110  
(7170-540-5773)

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: February 8, 1995

R-00943271C0024

PA POWER & LIGHT COMPANY  
PAUL E RUSSELL, GEN COUNSEL  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Eric Epstein. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

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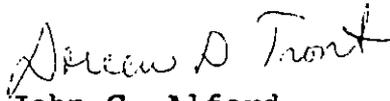
DOCUMENT  
FOLDER

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Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: February 8, 1995

**DOCKETED**  
FEB 08 1995

Eric Epstein  
Complainant

VS.

Complaint Docket  
No: R-00943271C0024

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

DOCUMENT  
FOLDER

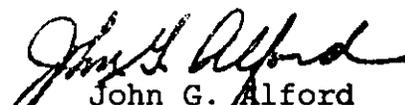
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prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested

ORIGINAL



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

February 27, 1995

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

**RECEIVED**  
FEB 27 1995

SECRETARY'S OFFICE  
Public Utility Commission

Re: **Eric Epstein v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0024**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Eric Epstein  
The Honorable Michael C. Schnierle

**DOCUMENT  
FOLDER**

2-27  
1-10

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Eric Epstein

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0024

\_\_\_\_\_  
CERTIFICATION OF SERVICE  
\_\_\_\_\_

**RECEIVED**  
FEB 27 1995

SECRETARY'S OFFICE  
Public Utility Commission

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Eric Epstein  
2308 Brandywine Drive  
Harrisburg, Pennsylvania 17110

Dated this 27th day of February.

  
\_\_\_\_\_  
Paul E. Russell



By way of further answer, the Public Utility Commission reviewed the costs of constructing both Susquehanna units and did not find that any of those costs were unreasonable or imprudent (order entered on August 22, 1983 at Docket No. R-822169 and order entered on April 26, 1985 at Docket No. R-842651). Since its commercial operation date, Susquehanna has had an outstanding operating record. In every year since 1987, the plant has had an annual capacity factor greater than 70%; in every year during this period, the plant's annual capacity factor has exceeded the industry average. In three out of those seven years, Susquehanna's annual capacity factor exceeded 80%. PP&L has calculated that during the 1987-93 period, its customers realized fuel savings of approximately \$140 million as a direct result of the Company's ability to operate Susquehanna at a capacity factor above 70%.

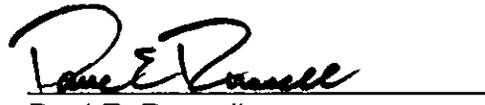
4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", is written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:

David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 27, 1995  
at Allentown, Pennsylvania



**FORMAL COMPLAINT FORM**  
**Pennsylvania Public Utility Commission**

R-00943271C0025  
110500

Please Print:

**ORIGINAL**

RECEIVED  
FEB - 7 11:12:16  
PA. P. U. C. DIV.  
INFO. CONTROL

**1. Your Name, Mailing Address and Telephone Number**

Name STEPHEN SMITH  
Street/P.O. Box 734 8<sup>TH</sup> AVE Apt#   
City Bethlehem State PA Zip 18018  
County Lehigh Home Telephone-Area Code (610) 691-4359  
Work Telephone-Area Code ( )

**2. Which company does your complaint concern?**

Name of Company PENNA. Power + Light.

**DOCKETED**  
FEB 08 1995

**3. What is your complaint?**

I AM OPPOSED TO THE PROPOSED RATE HIKE OF OVER 21% FOR  
RESIDENTIAL USERS OF P.P.L.. THIS RATE HIKE IS TOO TOO STEEP  
PLUS THE FACT COMMERCIAL + INDUSTRIAL USERS RATE HIKE IS LIKE  
7% AND 9%.

ALSO PART OF THIS HIKE IS FOR P.P.L TO GET MONIES LOST  
FROM THEIR INVESTMENTS IN NUCLEAR POWER. I AM OPPOSED TO  
ANY FORM OF NUCLEAR POWER BECAUSE THE WASTE FROM SUCH ENERGY  
CANNOT BE TAKEN CARE OF SAFELY. AND THE COSTS OF SUCH ENERGY IS  
ALWAYS ENORMOUS. IF THEY MADE BAD INVESTMENTS, DO NOT I  
REPEATED DO NOT MAKE THE USERS OF P.P.L PAY FOR IT. ALSO WHY  
MUST RESIDENTIAL USERS PAY OVER 21% MORE BESIDES P.P.L IS THE ONLY  
UTILITY TO OBTAIN SO THEY MUST BE HELD ACCOUNTABLE FOR THIS MONOPOLY.  
PLEASE TAKE TO ACCOUNT THIS HIKE IS TOO HIGH AND UNCALLED FOR, TO MAKE  
USERS PAY FOR PAST INVESTMENTS GONE BAD. IT'S NOT MY FAULT.

(If you need more space use additional paper and attach to this form).

(-over-)

DOCUMENT  
FOLDER

20

4. What do you want the Public Utility Commission to do about your complaint?

Review it and make sure a 21% hike increase  
is not imposed on its users who have no or  
little say in the matter. IF the reason for the  
rate hike is to recover monies from investments, that  
is wrong. Do not pass the buck to its users.

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.



1/27/95

Signature of complaining person, or officer

Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: February 8, 1995

R-00943271C0025

PA POWER & LIGHT COMPANY  
PAUL E RUSSELL, GEN COUNSEL  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Stephen Smith. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

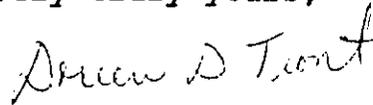
DOCUMENT  
FOLDER

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED  
FEB 08 1995

DATE SERVED: February 8, 1995

Stephen Smith  
Complainant

VS.

Complaint Docket  
No: R-00943271C0025

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

DOCUMENT  
FOLDER

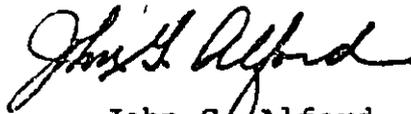
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which

prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested

DATE: February 8, 1995

SUBJECT: R-00943271C0025

TO: Office of Administrative Law Judge

FROM: John G. Alford, Secretary *JA*

DOCKETED  
FEB 08 1995

REPORT  
FOLDER

PENNSYLVANIA POWER AND LIGHT COMPANY

Attached is copy of a formal complaint filed in connection with the above docketed proceeding.

This matter is assigned to your office for action.

Attachment - copy of complaint

cc: Office of Special Assistants - w/copy of complaint  
Office of Trial Staff - w/copy of complaint  
Press Secretary John Frazier - w/copy of complaint



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

ORIGINAL

February 27, 1995

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



SECRETARY'S OFFICE  
Public Utility Commission

Re: **Stephen Smith v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0025

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Stephen Smith  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

2-27  
137

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Stephen Smith

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0025

**RECEIVED**  
FEB 27 1995

SECRETARY'S OFFICE  
Public Utility Commission

---

**CERTIFICATION OF SERVICE**

---

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Stephen Smith  
734 Eighth Avenue  
Bethlehem, Pennsylvania 18018

Dated this 27th day of February.



Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Stephen Smith

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0025

ORIGINAL

RECEIVED  
FEB 27 1995

---

ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

---

SECRETARY'S OFFICE  
Public Utility Commission

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. By way of further answer, an analysis of PP&L's retail

rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the

DOCUMENT  
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MAR 07 1995

Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

By way of further answer, the Public Utility Commission reviewed the costs of constructing both Susquehanna units and did not find that any of those costs were unreasonable or imprudent (order entered on August 22, 1983 at Docket

No. R-822169 and order entered on April 26, 1985 at Docket No. R-842651). Since its commercial operation date, Susquehanna has had an outstanding operating record. In every year since 1987, the plant has had an annual capacity factor greater than 70%; in every year during this period, the plant's annual capacity factor has exceeded the industry average. In three out of those seven years, Susquehanna's annual capacity factor exceeded 80%. PP&L has calculated that during the 1987-93 period, its customers realized fuel savings of approximately \$140 million as a direct result of the Company's ability to operate Susquehanna at a capacity factor above 70%. PP&L has developed appropriate strategies for the safe handling and disposition of all waste material from the Susquehanna plant.

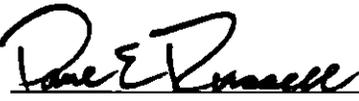
4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", is written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 27, 1995  
at Allentown, Pennsylvania



**FORMAL COMPLAINT FORM**  
**Pennsylvania Public Utility Commission**

R-00943271C0026  
110500

**ORIGINAL**

RECEIVED  
KJR  
95 FEB -7 AM 9:01  
PA. P.U.C.  
INFO. CONTROL DIV.

Please Print:

**1. Your Name, Mailing Address and Telephone Number**

Name PATRICIA FABISIAK

Street/P.O. Box 120 SOUTH MAPLE STREET Apt#

City MOUNT CARMEL State PA Zip 17851

County NORTHUMBERLAND Home Telephone-Area Code ( 717 ) 339-3642

Work Telephone-Area Code (  )

**2. Which company does your complaint concern?**

Name of Company PENNSYLVANIA POWER AND LIGHT COMPANY (PP&L)

**3. What is your complaint?**

PP&L HAS REQUESTED A 20.7% RATE INCREASE IN RESIDENTIAL ELECTRIC SERVICE.

**DOCKETED**  
FEB 08 1995

**DOCUMENT  
FOLDER**

(If you need more space use additional paper and attach to this form).

**4. What do you want the Public Utility Commission to do about your complaint?**

THE AMOUNT REQUESTED BY PP&L, 20.7%, IS WELL ABOVE THE COST-OF-LIVING INDEX  
AND AS SUCH IS HIGHLY INFLATIONARY. WHEN THE FEDERAL GOVERNMENT ONLY MANDATES  
A 2.8% INCREASE IN SOCIAL SECURITY, IT MAKES THE REQUESTED INCREASE BY PP&L  
BEYOND REASON. I AM THEREFORE REQUESTING THAT YOU DENY THE INCREASE OR KEEP  
ANY GRANTED INCREASE IN LINE WITH THE COST OF LIVING.  
  
IT SHOULD ALSO BE REQUIRED THAT PP&L CUT ADMINISTRATIVE COSTS IN ORDER TO  
LOWER THE PROPOSED INCREASE.

(If you need more space use additional paper and attach to this form).

**5. You must sign and date your complaint.**

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

*Patricia Tobiasia*

*FEB 4, 1995*

Signature of complaining person, or officer

Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

**6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.**

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

R-00943271 (0026)

120 South Maple Street  
Mt. Carmel, PA 17851-2025  
February 4, 1995

Office of Administrative Law Judge  
Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Dear sir:

I have included with this letter three copies of the formal complaint against the rate increase proposed by PP&L.

I am on SSI disability and do not have any means of transportation to a hearing in Harrisburg. There is nothing further that I can add to my complaint and I respectfully request that the complaint be filed and ruled without my presence at the hearing and that the formal complaint serve in my absence.

Thank you.

Yours truly,

*Patricia Fabisiak*  
patricia fabisiak

RECEIVED  
95 FEB -7 AM 9:02  
PA. P. U. C.  
INFO. CONTROL DIV.

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: February 8, 1995

R-00943271C0026

PA POWER & LIGHT COMPANY  
PAUL E RUSSELL, GEN COUNSEL  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Patricia Fabisiak. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

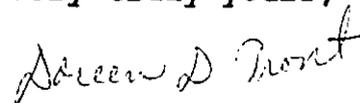
DOCUMENT  
FOLDER

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: February 8, 1995

Patricia Fabisiak  
Complainant

VS.

Pa Power & Light Co  
Respondent

Complaint Docket  
No: R-00943271C0026

DOCKETED  
FEB 08 1995

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

DOCUMENT  
FOLDER

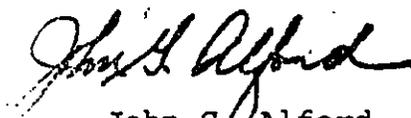
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which

prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

ORIGINAL

February 27, 1995

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

RECEIVED  
FEB 27 1995

SECRETARY'S OFFICE  
Public Utility Commission

Re: **Patricia Fabisiak v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0026**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Ms. Patricia Fabisiak  
The Honorable Michael C. Schnierle

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2-27  
141

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Patricia Fabisiak

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0026

---

CERTIFICATION OF SERVICE

---

RECEIVED  
FEB 27 1995

SECRETARY'S OFFICE  
Public Utility Commission

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Ms. Patricia Fabisiak  
120 South Maple Street  
Mount Carmel, Pennsylvania 17851

Dated this 27th day of February.



Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Patricia Fabisiak

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0026

**RECEIVED**  
FEB 27 1995

---

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

SECRETARY'S OFFICE  
Public Utility Commission

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. PP&L does not have sufficient knowledge or information

to respond to Complainant's statements regarding her personal finances.

By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is

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- 1 - FOLDER  
MAR 07 1995

proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

By way of further answer, PP&L has undertaken many initiatives to control its costs, including administrative costs. Those initiatives have enabled the Company to maintain retail base rate stability for the past ten years. Moreover, the effects of one such initiative, the Voluntary Early Retirement Plan, has reduced PP&L's jurisdictional revenue requirements reflected in this filing by approximately \$12 million.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

KJR

RECEIVED  
95 FEB 10 11:10:01  
INFO. CONTROL DIV.

Please Print:

ORIGINAL

R-0094327/C0027

1. Your Name, Mailing Address and Telephone Number

Name Mark J. Modderman  
Street/P.O. Box 884 Hilltop Dr Apt# \_\_\_\_\_  
City Mt Joy State PA Zip 17552  
County Lancaster Home Telephone-Area Code (717) 684-6901  
Work Telephone-Area Code (717) 569-6633

2. Which company does your complaint concern?

Name of Company PP+L 10500 DOCKETED  
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FEB 13 1995

3. What is your complaint?

In response to PP+L's request for a 20.7%  
rate increase I am opposed. First the most  
obvious reason is that this is an absurd  
amount to increase anything all at one time,  
especially on utility. I can not imagine that  
the average person would get such a raise  
in pay to coincide with such an increase  
Secondly our home has baseboard heat, which  
means not only our electric costs will rise 20.7%  
but our heat costs will as well. The third and  
last reason is that the Columbia Water Company  
along with the DER this past November made it  
mandatory that we install a dual check valve  
and overflow tank to the tune of \$25.- of which

(If you need more space use additional paper and attach to this form).

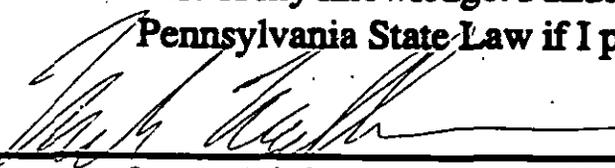
4. What do you want the Public Utility Commission to do about your complaint?

we had to pay Money we really didn't  
First Water Co then the Electric Co. with  
Next do people think this money is  
Sure come from it sure doesn't grow  
on In conclusion if P+L can show just  
now their rates must be raised. I feel  
it should be extremely lower than their request  
of 20.7%.

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.



2/8/95

Signature of complaining person, or officer

Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
PO BOX 3265, HARRISBURG, PA 17105-3265  
February 13, 1995

KJR

R-943271C0027

PAUL RUSSELL, GENERAL COUNSEL  
PENNSYLVANIA POWER & LIGHT CO  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101

Dear Sir:

A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **MARK J. MODDERMAN**. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20 DAYS) THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

**CUSTOMER OF A UTILITY**

A PAYMENT SCHEDULE MAY BE PRESCRIBED OR A TERMINATION OF UTILITY SERVICES MAY BE AUTHORIZED. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

**COMPANY/UTILITY**

AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

DOCUMENT  
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Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

for John G. Alford, Secretary

fao  
Attachment

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
February 13, 1995

---

MARK J. MODDERMAN

---

Complaint Docket  
No. R-943271C0027

v.

PENNSYLVANIA POWER & LIGHT COMPANY

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: PENNSYLVANIA POWER & LIGHT COMPANY

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 PA CS §702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, PO Box 3265, Harrisburg, PA, 17105-3265, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 PA Code §5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 PA Code §1.56(a).

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FOLDER

DOCKETED  
FEB 13 1995

2. If you fail to either satisfy this complaint or to file an answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 PA Code §5.61.

In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq.; And, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 PA CS §703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in this complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested

ORIGINAL



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

February 27, 1995

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FEB 27 1995

SECRETARY'S OFFICE  
Public Utility Commission

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

**Re: Mark J. Modderman v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0027**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Mark J. Modderman  
The Honorable Michael C. Schrierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mark J. Modderman

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0027

---

CERTIFICATION OF SERVICE

---

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Mark J. Modderman  
884 Hilltop Drive  
Mount Joy, Pennsylvania 17552

Dated this 27th day of February.

  
\_\_\_\_\_  
Paul E. Russell

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FEB 27 1995

SECRETARY OF THE  
PUBLIC UTILITY COMMISSION

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mark J. Modderman

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0027

---

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. PP&L is without knowledge or information sufficient to

respond to Complainant's statements regarding his personnel finances. By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average

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MAR 07 1995

increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", is written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

ORIGINAL

Please Print:

R-00943271C0028

RECEIVED  
95 FEB 10 AM 10:01  
PA. P. U. C.  
INFO. CONTROL DIV.

1. Your Name, Mailing Address and Telephone Number

Name J. EDWARD WILSON  
Street/P.O. Box PO BOX 5834 Apt# \_\_\_\_\_  
City HARRISBURG State PA Zip 17110  
County Dauphin Home Telephone-Area Code (717) 541 8736  
Work Telephone-Area Code ( )

2. Which company does your complaint concern?

Name of Company PA POWER + LIGHT Co

3. What is your complaint?

PP+L HAS APPLIED FOR A 20% RATE  
INCREASE FOR RESIDENTIAL CUSTOMERS

(If you need more space use additional paper and attach to this form).

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FEB 14 1995

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59

4. What do you want the Public Utility Commission to do about your complaint?

I WANT THE PUC TO VERIFY THE  
NEED FOR ANY RATE INCREASE BY  
PP&L ON RESIDENTIAL CUSTOMERS

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

*J. Edward Wilson*

*2/8/95*

Signature of complaining person, or officer

Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

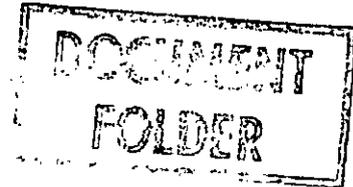
Telephone Number-Area Code ( ) \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
PO BOX 3265, HARRISBURG, PA 17105-3265  
February 14, 1995

KJR

R-00943271C0028

PAUL E. RUSSELL  
PA POWER AND LIGHT COMPANY  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101



A Complaint has been filed against you before the Pennsylvania Public Utility Commission by J. EDWARD WILSON. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20 DAYS) THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

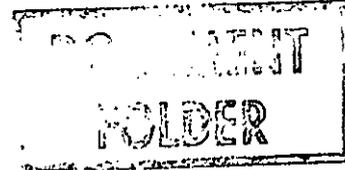
A handwritten signature in cursive script, appearing to read "John G. Alford".

John G. Alford, Secretary

bje  
Attachment

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 14, 1995



J. EDWARD WILSON  
Complainant :  
 :  
 v. : Complaint Docket  
 : No. R-00943271C0028  
 :  
 PA POWER AND LIGHT COMPANY :  
 Respondent :

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Mr. Russell

**DOCKETED**  
FEB 14 1995

**TAKE NOTICE:**

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120**, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code

Section 1.56(a).

2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes

or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

ORIGINAL

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

FAX: 610/774-6726

February 27, 1995

RECEIVED

FEB 27 1995

SECRETARY  
Public Utility Commission

Mr. G. Alford, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 265  
Harrisburg, Pennsylvania 17105-3265

Re: **J. Edward Wilson v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0028

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. J. Edward Wilson  
The Honorable Michael C. Schnierle

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

J. Edward Wilson

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0028

---

CERTIFICATION OF SERVICE

---

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. J. Edward Wilson  
P.O. Box 5834  
Harrisburg, Pennsylvania 17110

Dated this 27th day of February.

RECEIVED

FEB 27

STANDARD  
POSTAL SERVICE



---

Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

J. Edward Wilson

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0028

---

ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

---

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. By way of further answer, an analysis of PP&L's retail

rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the

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Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", is written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

ORIGINAL

Please Print:

R-00943271C0029

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95 FEB 15 AM 9:31  
PA. P. U. C.  
INFO. CONTROL DIV.

KJR

1. Your Name, Mailing Address and Telephone Number

Name James Van Lenten  
Street/P.O. Box 2323 Andrew Ave Apt#   
City Mount Joy State PA Zip 17552  
County Lancaster Home Telephone-Area Code (717) 653-9208  
Work Telephone-Area Code (717) 626-2000

2. Which company does your complaint concern?

Name of Company P. P. & L.

3. What is your complaint?

I am writing this complaint to protest PP&L's proposed rate increase of 20.7% for residential customers. I do not feel that such a large increase is fair to the consumer, especially since I can't get my electric from another company if I can't afford to pay the higher rate. The electric company has a monopoly and should have to provide very convincing evidence that they need such an increase. What is this increase for ??? Hopefully it would be for better service or for research for more efficient ways of producing energy, and not for more profit and increased salaries. Why is the commercial rate increase so much less than the residential ??? They are asking the people least able to pay more to pay more. If a commercial customer has to pay more for electricity, they can pass the increase on to their customers, but how does the residential

(If you need more space use additional paper and attach to this form).

customer come up with 20% more ?? He has to take money from another area of his budget (maybe) (-over-) from his food

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2/15  
12

4. What do you want the Public Utility Commission to do about your complaint?

I strongly recommend the PUC investigate their proposed rate increase to determine the reasons for the increase, and to make sure everyone pays a fair share.

If I went to my boss and ~~would~~ demanded a 20% raise, I would be looking for a new job. I can't get electric service from another source, so I'm stuck.

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

John E. Van Lente  
Signature of complaining person, or officer

13 FEB 95  
Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

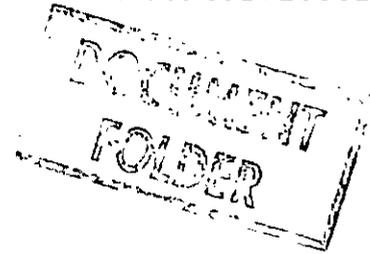
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
PO BOX 3265, HARRISBURG, PA 17105-3265  
February 15, 1995

KJR

R-00943271C0029



PAUL E. RUSSELL  
PENNSYLVANIA POWER & LIGHT COMPANY  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101

A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **JAMES VAN LENTEN**. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20 DAYS) THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
(800) 692-7375

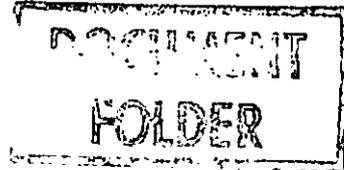
Very truly yours,

John G. Alford, Secretary

bje  
Attachment

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 15, 1995



JAMES VAN LENTEN  
Complainant

v.

PENNSYLVANIA POWER & LIGHT  
Respondent

:  
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:  
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:

Complaint Docket  
No. R-00943271C0029

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

**DOCKETED**  
FEB 15 1995

TO: Mr. Russell

**TAKE NOTICE:**

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120**, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code

Section 1.56(a).

2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes

or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

ORIGINAL

February 27, 1995

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

RECEIVED  
FEB 27 1995

SECRETARY'S OFFICE  
Public Utility Commission

Re: **James Van Lenten v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0029

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. James Van Lenten  
The Honorable Michael C. Schnierle

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ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

James Van Lenten

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0029

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CERTIFICATION OF SERVICE  
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FEB 27 1995

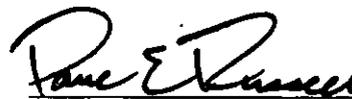
OFFICE  
1995

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. James Van Lenten  
2323 Andrew Avenue  
Mount Joy, Pennsylvania 17552

Dated this 27th day of February.



\_\_\_\_\_  
Paul E. Russell

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

James Van Lenten

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0029

RECEIVED  
FEB 27 1995

ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

SECRETARY'S OFFICE  
Public Utility Commission

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. By way of further answer, an analysis of PP&L's retail

rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the

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MAR 07 1995

Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

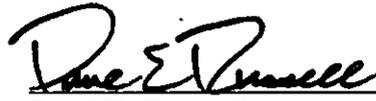
4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", is written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 27, 1995  
at Allentown, Pennsylvania





4. What do you want the Public Utility Commission to do about your complaint?

ALTHOUGH I HAVE READ THAT P.P. & L HAS NOT HAD A RATE INCREASE IN SOMETHING LIKE 10 YEARS, FROM A PRACTICAL STANDPOINT AND PERSONAL EXPERIENCE RESIDENTIAL ELECTRIC COSTS HAVE RISEN DUE TO INCREASED AND ADDED FEES, SERVICE CHARGES, PASSING ON TO CONSUMERS OF TAXES & SURCHARGES, ETC. SO P.P. & L. HAS CONTINUED TO RECOVER COSTS OF DOING BUSINESS. A 21% RATE HIKE PROPOSAL IS INDEFENSIBLE. I WANT PUC TO DISALLOW THIS REQUEST.

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

Donald J. Kiroch

2/12/95

Signature of complaining person, or officer (if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

Date Signed

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

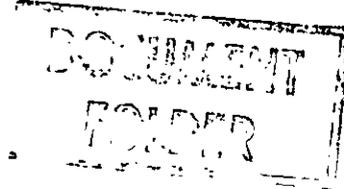
Telephone Number-Area Code ( ) \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
PO BOX 3265, HARRISBURG, PA 17105-3265  
February 15, 1995

KJR

R-00943271C0030

PAUL E. RUSSELL  
PENNSYLVANIA POWER & LIGHT COMPANY  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101



A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **TIMOTHY J. KOKOLUS**. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20 DAYS) THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

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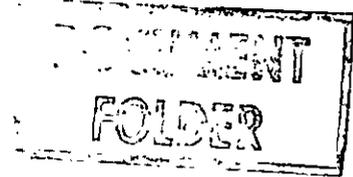
Very truly yours,

John G. Alford, Secretary

bje  
Attachment

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 15, 1995



TIMOTHY J. KOKOLUS  
Complainant

v.

PENNSYLVANIA POWER & LIGHT  
Respondent

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Complaint Docket  
No. R-00943271C0030

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FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

**DOCKETED**  
FEB 15 1995

TO: Mr. Russell

**TAKE NOTICE:**

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120**, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code

Section 1.56(a).

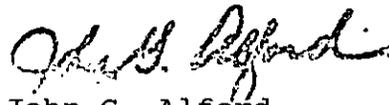
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4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

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John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

ORIGINAL

KJR

February 27, 1995

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

Re: **Timothy J. Kokolus v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0030**

RECEIVED

FEB 27 1995

SECRETARY'S OFFICE  
Public Utility Commission

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Timothy J. Kokolus  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Timothy J. Kokolus

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0030

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CERTIFICATION OF SERVICE

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The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Timothy J. Kokolus  
5628 East Lane  
Orefield, Pennsylvania 18069

Dated this 27th day of February.

  
Paul E. Russell

RECEIVED  
FEB 27 1997  
P. O. Box 3265  
Harrisburg, Pennsylvania

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Timothy J. Kokolus

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0030

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**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

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1. Admitted.
2. Admitted.
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rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the

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**DOCKETED**

MAR 07 1995

Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests  
that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in cursive script, appearing to read "Paul E. Russell", is written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: February 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

RECEIVED  
95 FEB 15 AM 9:3  
PA. P.U.C.  
INFO. CONTROL DIV.

Please Print: R-943271 ORIGINAL  
C0031

1. Your Name, Mailing Address and Telephone Number

Name ROBERT J. GUERRIERE  
Street/P.O. Box 598 1/2 BRIGHTON ST. Apt# \_\_\_\_\_  
City BETHLEHEM State PA. Zip 18015-1140  
County LEHIGH Home Telephone-Area Code (610) 882-9655  
Work Telephone-Area Code (610) 866-1678

2. Which company does your complaint concern?

Name of Company PENNSYLVANIA POWER & LIGHT CO. DOCUMENT FOLDER

3. What is your complaint?

THE PROPOSED RATE INCREASE OF \$261 MILLION PER YEAR IS ANOTHER RIDICULOUS ATTEMPT TO PERPETUATE THIS MONOPOLY'S BOTTOM LINE. HOW MUCH PROFIT MARGIN DOES THIS MONOPOLY REALLY NEED? PPL HAS NOT DONE ENOUGH TO REDUCE COSTS AND SINCE THEY HAVE A MONOPOLY, A RATE INCREASE IS THEIR ANSWER TO MISMANAGEMENT. AGAIN, RESIDENTIAL CUSTOMERS ARE BEING ASKED TO BEAR THE BRUNT OF THE INCREASE COMPARED TO INDUSTRIAL CUSTOMERS, AND THE RESIDENTIAL CUSTOMERS ARE THE ONES LEAST ABLE TO AFFORD THE INCREASE, ESPECIALLY OLDER RETIRED CITIZENS WHICH MAKE UP A LARGER PROPORTION OF OUR POPULATION THAN EVER BEFORE IN THE HISTORY OF THIS COUNTRY. I BELIEVE THAT THE PROFIT MARGIN PPL IS TRYING TO MAINTAIN, WITH THIS PROPOSED RATE INCREASE, IS TOO HIGH. WHY DO THEY NEED ALL THIS MONEY? PPL HAS NOT PROVEN THAT THEY HAVE REDUCED THEIR OPERATING EXPENSES IN A MANNER AS OTHER NON-MONOPOLY COMPANIES HAVE DONE. THEY ARE TAKING THE EASY WAY OUT BY ASKING FOR A RATE INCREASE. IF IT IS PPL'S POLICY TO ASK FOR A LARGE INCREASE AND THEN SETTLE FOR A LESSER INCREASE, WHICH IS

(If you need more space use additional paper and attach to this form).

DOCKETED

FEB 15 1995

(-over-)

4. What do you want the Public Utility Commission to do about your complaint?

WHAT THEY WANTED ALL ALONG, THEN THEY SHOULD BE PUNISHED FOR THIS PHILOSOPHY OF RUNNING THEIR BUSINESS. IT IS ALWAYS THE PUBLIC THAT SUFFERS FROM RATE INCREASES, ESPECIALLY DURING THE WINTER HEATING SEASON. PPL ENCOURAGES BUILDERS TO INSTALL ELECTRIC HEAT IN HOMES & APARTMENTS KNOWING FULL WELL THAT ELECTRIC HEAT IS MORE EXPENSIVE THAN OTHER FORMS OF HEAT TODAY. PLEASE ONLY GRANT THEM A RATE INCREASE THAT IS NECESSARY TO MAINTAIN A SENSIBLE PROFIT MARGIN. AND THEN ASK THEM TO REDUCE THEIR COSTS AS EVERY OTHER COMPANY IN THEIR SERVICE AREA HAS DONE TO SURVIVE. THE FAT CAT EXECUTIVE AT PPL GET PAID TOO MUCH. THEY SHOULD ALL TAKE PAY CUTS/BENEFIT REDUCTIONS LIKE MOST OF US HAVE ENJOINED RECENTLY.

PUC, PLEASE DO THE RIGHT THING! PROTECT US.

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

Robert J. Swemmer

2/14/95

Signature of complaining person, or officer

Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

DOCUMENT  
FOLDER

IN REPLY PLEASE  
REFER TO OUR FILE

February 16, 1995

R-943271C0031

PENNSYLVANIA POWER & LIGHT  
PAUL E RUSSELL, ESQ  
2 N 9TH ST  
ALLENTOWN PA 18101-1179

A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **ROBERT J GUERRIERE**. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20 DAYS) THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A PAYMENT SCHEDULE MAY BE PRESCRIBED OR A TERMINATION OF UTILITY SERVICES MAY BE AUTHORIZED. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

COMPANY/UTILITY

AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

lpw  
Attachment

for: John G. Alford, Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
February 16, 1995

DOCUMENT  
FOLDER

ROBERT J GUERRIERE

Complaint Docket  
No. R-943271C0031

v.

PENNSYLVANIA POWER & LIGHT

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

DOCKETED  
FEB 15 1995

TO: PENNSYLVANIA POWER & LIGHT

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 PA CS §702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, PO Box 3265, Harrisburg, PA, 17105-3265, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 PA Code §5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 PA Code §1.56(a).

2. If you fail to either satisfy this complaint or to file an answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 PA Code §5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq.; And, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 PA CS §703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in this complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



Pennsylvania Power & Light Company

KJR

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

ORIGINAL

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

FAX: 610/774-6726

March 3, 1995

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

RECEIVED  
MAR 3 1995

SECRETARY'S OFFICE  
Public Utility Commission

Re: **Robert J. Guerriere v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0031

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Robert J. Guerriere  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

87

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Robert J. Guerriere

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0031

---

CERTIFICATION OF SERVICE

---

RECEIVED  
MAR 3 1995

SECRETARY'S OFFICE  
Public Utility Commission

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Robert J. Guerriere  
598-1/2 Brighton Street  
Bethlehem, Pennsylvania 18015-1140

Dated this 3rd day of March, 1995.



---

Paul E. Russell

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**DOCKETED**

MAR 7 1995

Robert J. Guerriere

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0031

**RECEIVED**  
MAR 3 1995

---

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

SECRETARY'S OFFICE  
Public Utility Commission

**DOCUMENT  
FOLDER**

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attor-

ney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. By way of further answer, an analysis of PP&L's retail

rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the

Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

By way of further answer, PP&L encourages its customers to use electricity wisely and in the most efficient applications.

By way of further answer, PP&L has undertaken many initiatives to control its operating expenses. The success of these programs has helped the

Company to maintain retail base rate stability for the last ten years. Moreover, one of these initiatives, the Voluntary Early Retirement Program has reduced the retail revenue requirements reflected in the Company's filing by approximately \$12 million.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: March 3, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

ORIGINAL

Please Print:

R-943271 C0032

DOCUMENT  
FOLDER

RECEIVED  
95 FEB 15 AM 9:36  
PP&L  
CONTROL DIV  
18049

1. Your Name, Mailing Address and Telephone Number

Name CHARLES M. TODARO  
Street/P.O. Box 1250 W. JUBILEE ST Apt#  
City EMMAUS State PA Zip 18049  
County LEHIGH Home Telephone-Area Code (610) 965-9207  
Work Telephone-Area Code ( )

2. Which company does your complaint concern?

Name of Company PENNA POWER AND LIGHT COMPANY

DOCKETED

FEB 15 1995

3. What is your complaint?

\_\_\_\_\_ The proposed PP&L 21% rate increase for home owners is  
\_\_\_\_\_ excessive if at all justified. Shareholders will benefit  
\_\_\_\_\_ and overall administrative practices will benefit. I note  
\_\_\_\_\_ that whenever mild winter weather prevails as it has this  
\_\_\_\_\_ year and gas and electric use declines, utilities always  
\_\_\_\_\_ request a rate rise. A monopoly can get away with this.  
\_\_\_\_\_ The proposed rate increase of almost \$10 a month, nearly  
\_\_\_\_\_ \$120 a year will greatly hurt young families and retirees  
\_\_\_\_\_ living, like myself on SS and small pensions. Three such  
\_\_\_\_\_ neighbors, elderly widows are barely making it now. I am  
\_\_\_\_\_ 76, my wife 72. The difference between 21% for homeowners  
\_\_\_\_\_ and 2%, 9% for business cannot be swallowed although I  
\_\_\_\_\_ can understand a small increase for a company that is a  
\_\_\_\_\_ large user of utility services can be costly. PP&L is  
\_\_\_\_\_ dumping on homeowners, young families and retirees for  
\_\_\_\_\_ sudden administrative moves that most likely could have  
\_\_\_\_\_ been made over a longer period of time starting some years  
\_\_\_\_\_ back and absorbed slowly over time.

4. What do you want the Public Utility Commission to do about your complaint?

DENY RATE INCREASE - OR CUT IT BY 2/3'S.  
FOR HOMEOWNERS  
  
IF A PUBLIC HEARING IS HELD, HOLD IT  
WHERE PARKING IS AVAILABLE.  
ALLENTOWN HAS NO PARKING FACILITIES

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

Charles M. Codaro

Feb 12, 1995

Signature of complaining person, or officer  
(if customer is a corporation, trust or association) or  
member (if customer is a partnership). Make sure the  
complaint form with your original signature is one of  
the copies you return to the Commission.

Date Signed

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

3 45



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

DOCUMENT  
FOLDER  
IN REPLY PLEASE  
REFER TO OUR FILE

February 16, 1995

R-943271C0032

PENNSYLVANIA POWER & LIGHT  
PAUL E RUSSELL, ESQ  
2 N 9TH ST  
ALLENTOWN PA 18101-1179

A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **CHARLES M TODARO**. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20 DAYS) THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A PAYMENT SCHEDULE MAY BE PRESCRIBED OR A TERMINATION OF UTILITY SERVICES MAY BE AUTHORIZED. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

COMPANY/UTILITY

AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

lpw  
Attachment

for: John G. Alford, Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
February 16, 1995

DOCUMENT  
FOLDER

CHARLES M TODARO

---

Complaint Docket  
No. R-943271C0032

v.

PENNSYLVANIA POWER & LIGHT

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: PENNSYLVANIA POWER & LIGHT

DOCKETED  
FEB 15 1995

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 PA CS §702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, PO Box 3265, Harrisburg, PA, 17105-3265, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 PA Code §5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 PA Code §1.56(a).

2. If you fail to either satisfy this complaint or to file an answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 PA Code §5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 PA CS §703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in this complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services.

In the imposition of a penalty after hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



Pennsylvania Power & Light Company

ORIGINAL

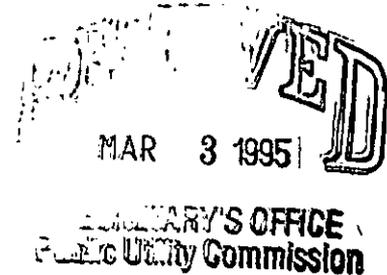
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 3, 1995

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



Re: **Charles M. Todaro v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0032**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Charles M. Todaro  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

80

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Charles M. Todaro

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0032

RECEIVED  
MAR 3 1995

---

**CERTIFICATION OF SERVICE**

---

SECRETARY'S OFFICE  
Public Utility Commission

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Charles M. Todaro  
1250 W. Jubilee Street  
Emmaus, Pennsylvania 18049

Dated this 3rd day of March, 1995.

  
\_\_\_\_\_  
Paul E. Russell

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**DOCKETED**

**MAR 7 1995**

Charles M. Todaro

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0032

**RECEIVED**  
MAR 3 1995

---

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

SECRETARY'S OFFICE  
Public Utility Commission

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. PP&L does not have knowledge or information sufficient

**DOCUMENT  
FOLDER**

to respond to Complainant's statements regarding his personal finances.

By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is

proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

By way of further answer, PP&L has undertaken many initiatives to control its costs, including administrative costs. Those initiatives have helped the Company to maintain retail base rate stability for the last ten years. Moreover, one such initiative, the Voluntary Early Retirement Program, has reduced the retail revenue requirements reflected in the Company's filing by approximately \$12 million.

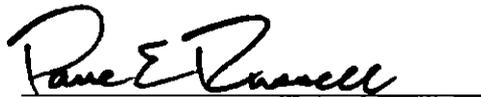
4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: March 3, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-943271C0033 ORIGINAL

RECEIVED  
95 FEB 15 AM 9:31  
PA. P.U.C. DIV.  
INFO. CONTROL

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name GERHARD AND MELANIE WENNING  
Street/P.O. Box 9124 JOYCE LANE Apt#             
City HUMMELSTOWN State PA Zip 17036  
County DAUPHIN Home Telephone-Area Code (717) 566-6560  
Work Telephone-Area Code (717) 787-7777

DOCUMENT FOLDER

2. Which company does your complaint concern?

Name of Company PP&L, TWO NORTH NINTH ST ALLENTOWN PA 18101

3. What is your complaint?

PP & L HAS REQUESTED A 20.7  
PERCENT RATE INCREASE FOR RESIDENTIAL CUSTOMERS.  
MY WIFE AND I FEEL THAT THIS RATE INCREASE  
IS OUTRAGEOUS. WE FEEL THAT THIS RATE  
INCREASE IS WHOLLY UNJUSTIFIED.  
THIS INCREASE WOULD BE TOO GREAT A  
BURDEN FOR MY WIFE AND I FINANCIALLY.

DOCKETED  
FEB 15 1995

(If you need more space use additional paper and attach to this form).

(-over-)

4. What do you want the Public Utility Commission to do about your complaint?

MY WIFE AND I REQUEST THAT THE P.U.C REFUSE ANY RATE INCREASE TO RESIDENTIAL CUSTOMERS AND RATHER ENCOURAGE PPL TO LOOK ELSEWHERE FOR INCREASED FUNDING.

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

*M. Louis Frank Mondett*

02/13/95

Signature of complaining person, or officer

Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

DOCUMENT  
FOLDER  
IN REPLY PLEASE  
REFER TO OUR FILE

February 16, 1995

R-943271C0033

PENNSYLVANIA POWER & LIGHT  
PAUL E RUSSELL, ESQ  
2 N 9TH ST  
ALLENTOWN PA 18101-1179

A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **GERALD & MELANIE WENDT**. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20 DAYS) THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A PAYMENT SCHEDULE MAY BE PRESCRIBED OR A TERMINATION OF UTILITY SERVICES MAY BE AUTHORIZED. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

COMPANY/UTILITY

AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

lpw  
Attachment

for: John G. Alford, Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
February 16, 1995

KJR  
DOCUMENT  
FOLDER

GERHARD & MELANIE WENDT

Complaint Docket  
No. R-943271C0033

v.

PENNSYLVANIA POWER & LIGHT

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

DOCKETED

FEB 15 1995

TO: PENNSYLVANIA POWER & LIGHT

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 PA CS §702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, PO Box 3265, Harrisburg, PA, 17105-3265, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 PA Code §5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 PA Code §1.56(a).

2. If you fail to either satisfy this complaint or to file an answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 PA Code §5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq.; And, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 PA CS §703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in this complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 PA CS §101, et seq; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services.

In the imposition of a penalty after hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

KJR

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

FAX: 610/774-6726

ORIGINAL

March 3, 1995

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

RECEIVED  
MAR 3 1995

SECRETARY'S OFFICE  
Public Utility Commission

Re: **Gerhard & Melanie Wendt v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0033**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Gerhard & Melanie Wendt  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Gerhard & Melanie Wendt

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0033

RECEIVED  
MAR 3 1995

---

CERTIFICATION OF SERVICE

---

SECRETARY'S OFFICE  
Public Utility Commission

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Gerhard & Melanie Wendt  
9124 Joyce Lane  
Hummelstown, Pennsylvania 17036

Dated this 3rd day of March, 1995.

  
\_\_\_\_\_  
Paul E. Russell



proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

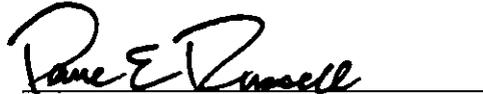
4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", is written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: March 3, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

ORIGINAL

Please Print: R-943271 C0034

DOCUMENT  
FOLDER

1. Your Name, Mailing Address and Telephone Number

Name ANDREW A. YOST

Street/P.O. Box 3511 WHITNEY AVE Apt# \_\_\_\_\_

City EASTON State PA Zip 18045

County NORTHAMPTON Home Telephone-Area Code (610) 250-0402

Work Telephone-Area Code ( ) \_\_\_\_\_

2. Which company does your complaint concern?

Name of Company PENNSYLVANIA POWER & LIGHT

3. What is your complaint?

REGARDING THE PROPOSED RATE INCREASE BY PP&L.

RECEIVED  
FEB 16 AM 9:40  
PA. P. U. C.  
INFO. CONTROL DIV.

Ref: Formal Complaint of Proposed Rate Increase by PP&L

Dear Sirs:

Politicians and Public Utilities are apparently of the few bureaucracies that can continue to vote their own pay increases without regards to the holistic economy. I and others around have endured difficult financial times with virtually no pay increases but have incurred significant increases in expenses. These increases are depleting the middle class working persons to the point of near desperation. I believe it is about time all share in the efforts to stabilize our economy and utilities be included. Benefit cutbacks, pay sacrifices, reduced frivolous spending, etc, for a few. I Am against the proposed increase in its entirety.

DOCKETED  
FEB 17 1966

(If you need more space use additional paper and attach to this form).

4. What do you want the Public Utility Commission to do about your complaint?

DENY THE RATE INCREASE

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

Andrew A. Zost *Andrew A. Zost*

2/14/95

Signature of complaining person, or officer

Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P O BOX 3265, HARRISBURG PA 17105-3265

DATE RESERVED: February 27, 1995

R-00943271C0034

PA POWER & LIGHT COMPANY  
PAUL E RUSSELL, GEN COUNSEL  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Andrew A. Yost. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

DOCUMENT  
FOLDER

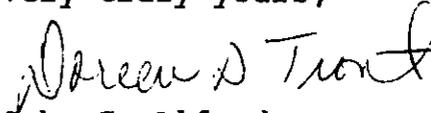
R-00943271C0034

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: February 27, 1995

Andrew A. Yost  
Complainant

VS.

Complaint Docket  
No: R-00943271C0034

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

**DOCKETED**  
FEB 27 1995

TO: Pa Power & Light Co

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

DOCUMENT  
FOLDER

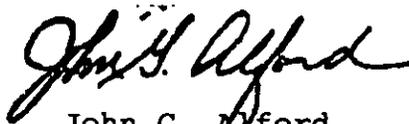
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which

prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

ORIGINAL

March 3, 1995

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

RECEIVED  
MAR 3 1995

SECRETARY'S OFFICE  
Public Utility Commission

Re: **Andrew A. Yost v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0034**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Andrew A. Yost  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Andrew A. Yost

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0034

**RECEIVED**  
MAR 3 1995

---

**CERTIFICATION OF SERVICE**

---

SECRETARY'S OFFICE  
Public Utility Commission

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Andrew A. Yost  
3511 Whitney Avenue  
Easton, Pennsylvania 18045

Dated this 3rd day of March, 1995.

  
\_\_\_\_\_  
Paul E. Russell



PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests  
that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", is written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: March 3, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

ORIGINAL

Please Print:

R-00943271 C0035

KJR

1. Your Name, Mailing Address and Telephone Number

Name Bruce McINTOSH  
Street/P.O. Box 209 NORTHAMPTON Apt# \_\_\_\_\_  
City HELLERTOWN State PA Zip 18055  
County NORTHAMPTON Home Telephone-Area Code (610) 838-7335  
Work Telephone-Area Code ( ) \_\_\_\_\_

2. Which company does your complaint concern?

Name of Company PP+L

RECEIVED  
95 FEB 15 AM 9:39  
PA P.U.C.  
INFO. CONTROL DIV.

3. What is your complaint?

PROPOSED RATE INCREASE BY  
PP+L IS TOO LARGE. WHY?  
ONLY INCREASES OF 1% TO 5% A  
YEAR SHOULD BE ACCEPTABLE

(If you need more space use additional paper and attach to this form).

DOCUMENT  
FILED

(-over-)

DOCKETED  
FEB 17 1995

2-16  
32

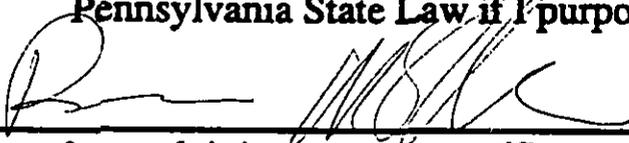
4. What do you want the Public Utility Commission to do about your complaint?

Keep INCREASE to a minimum  
1% to 5% only

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.



2/13/95

Signature of complaining person, or officer

Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

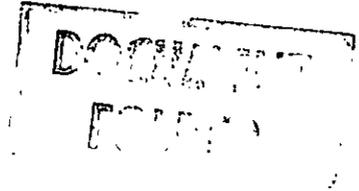
Telephone Number-Area Code ( ) \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
PO BOX 3265, HARRISBURG, PA 17105-3265  
February 17, 1995

KJR

R-00943294C0035

PAUL E. RUSSELL, ESQUIRE  
PENNSYLVANIA POWER AND LIGHT COMPANY  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101-1179



A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **BRUCE MCINTOSH**. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20 DAYS) THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

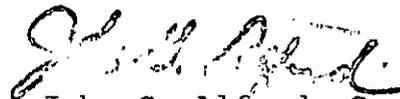
AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

  
John G. Alford, Secretary

bje  
Attachment

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 17, 1995

BRUCE MCINTOSH

Complainant

v.

PENNSYLVANIA POWER AND LIGHT

Respondent

:  
:  
:  
:  
:  
:

Complaint Docket

No. R-00943271C0035

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Mr. Russell

DOCKETED  
FEB 17 1995

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120**, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code

Section 1.56(a).

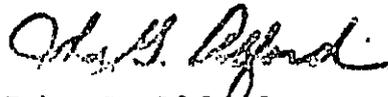
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes

or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

ORIGINAL

March 3, 1995

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

RECEIVED  
MAR 3 1995

SECRETARY'S OFFICE  
Public Utility Commission

**Re: Bruce McIntosh v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0035**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Bruce McIntosh  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Bruce McIntosh

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0035

---

**CERTIFICATION OF SERVICE**

---

**RECEIVED**  
MAR 3 1995

OFFICE  
Public Utility Commission

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Bruce McIntosh  
208 Northampton Street  
Hellertown, Pennsylvania 18055

Dated this 3rd day of March, 1995.



Paul E. Russell

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Bruce McIntosh

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0035

DOCKETED

MAR 7 1995

DOCUMENT  
FOLDER  
RECEIVED  
MAR 3 1995

---

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

...S OFFICE  
Public Utility Commission

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.

3. Denied. By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the

Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests  
that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", is written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: March 3, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

ORIGINAL RECEIVED  
95 FEB 16 AM 9:39  
INFO. CONTROL DIV.

Please Print:

R-00943271C0036

1. Your Name, Mailing Address and Telephone Number

Name Victor J. Meyer

Street/P.O. Box 354 Main St. Apt#

City East Greenville State Pa. Zip 18041

County Montgomery Home Telephone-Area Code (215) 679-7318

Work Telephone-Area Code ( )

2. Which company does your complaint concern?

Name of Company Pennsylvania Power + Light "P.P.+L."

3. What is your complaint?

I object to PP&L's proposed 20% residential Customer rate increases.  
The yeild per share of PP&L stock as of 1994 stood at 8.51%, thats 2 1/2 points  
higher than Treasury Securities for 1994. PP&L's payout ratio for the  
same period was a whopping 139.2%. This figure represents how many Cents  
are paid out in dividends for each dollar of earnings. This figure of  
139.2% represents the third largest payout ratio of all tne Utility stock  
information I could aquire. I aquired this information from fifty (50)  
Utility Companies throughout the entire country, from the East Coast to  
the West Coast, from Vermont to Houston, Texas.

I realize PP&L will probably require Large Captial expenditures to  
meet the 1990 Clean Air Act, requiring reduced sulfur dioxide emissions  
and a safe way to dispose of their spent fuel from their nuclear power  
plants, however, I question how can PP&L justify an 8.51% return to their  
Share Holders, and a 139.2% pay out ratio.

(If you need more space use additional paper and attach to this form).

COMPLAINT  
POWER

(-over-)

DOCKETED

FEB 17 1995

2-14  
33

4. What do you want the Public Utility Commission to do about your complaint?

I suggest the P.U.C. require a dividend reduction of 20% and a reduction of 10% in corporate expenditures. "DOWN SIZE" the operation! PP&L has not experienced any competition from the New Class of Independent Power Producers, as have many utility companies. Because of this they have no need to produce a cheaper, quality product, in order to keep their customers from switching to wholesale generators.

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

Walter J. Meyer  
Signature of complaining person, or officer

2/14/95  
Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

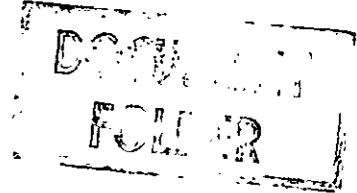
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
PO BOX 3265, HARRISBURG, PA 17105-3265  
February 17, 1995

R-00943294C0036

PAUL E. RUSSELL, ESQUIRE  
PENNSYLVANIA POWER AND LIGHT COMPANY  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101-1179



A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **VICTOR J. MOYER**. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20 DAYS) THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

John G. Alford, Secretary

bje  
Attachment

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 17, 1995

VICTOR J. MOYER

Complainant

v.

PENNSYLVANIA POWER AND LIGHT

Respondent

:  
:  
:  
:  
:  
:

Complaint Docket

No. R-00943271C0036

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

DOCKETED

FEB 17 1995

TO: Mr. Russell

**TAKE NOTICE:**

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120**, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code

Section 1.56(a).

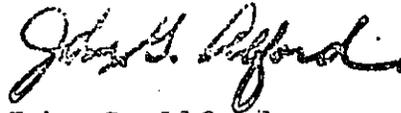
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes

or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

RECEIVED

March 3, 1995

MAR 3 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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

Re: **Victor J. Moyer v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0036**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Victor J. Moyer  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Victor J. Moyer

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0036

RECEIVED

MAR 3 1995

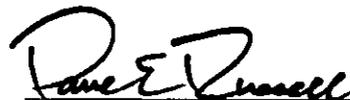
**CERTIFICATION OF SERVICE** PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Victor J. Moyer  
354 Main Street  
East Greenville, Pennsylvania 18041

Dated this 3rd day of March, 1995.



Paul E. Russell

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**DOCKETED**

**MAR 7 1995**

Victor J. Moyer

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0036

**DOCUMENT  
FOLDER**

**RECEIVED**

MAR 3 1995

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. The Complaint does not provide a sufficient basis for

PP&L to respond to the statements concerning the yield on PP&L's common stock or the yield on United States Treasury securities. The Complaint does not indicate a time frame for the calculation of the yields cited. In addition, with respect to the yield on Treasury securities, the Complaint does not indicate which of the many Treasury securities is being compared.

The statements in the Complaint regarding PP&L's dividend payout ratio are denied. Based on an annualized common stock dividend rate of \$1.67 per share and reported earnings of \$1.41 per share for 1994, the dividend payout ratio was 118%. However, there are several one-time charges reflected in PP&L's reported earnings. If these one-time charges are excluded, it is possible to determine PP&L's earnings from ongoing operations. Excluding the one-time charges recorded in 1994, PP&L's earnings were \$2.02 per share and on this basis the dividend payout ratio was 83%.

By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", is written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: March 3, 1995  
at Allentown, Pennsylvania



**ORIGINAL**  
Please Print:

**FORMAL COMPLAINT FORM**  
Pennsylvania Public Utility Commission

R-00943271C0037  
110500

RECEIVED  
95 FEB 13 AM 11:16

1. Your Name, Mailing Address and Telephone Number P. U. C. INFO. CONTROL DIV.

Name Paul Gatto

Street/P.O. Box 1065 Lincoln St Apt#

City Dickson City State PA. Zip 18519

County Lacka. Home Telephone-Area Code (717) 383-8845

Work Telephone-Area Code ( )

2. Which company does your complaint concern?

Name of Company PA. Power and Light

3. What is your complaint?

I would like P.P.L. to reasonably explain how they can justify an 26.7% rate increase request. Are they figuring ask for a lot and be granted what they are really looking for. We are the customer and them they supplier. We demand greater scrutiny and reasoning for their outrageous request.

DOCUMENT  
FOLDER

DOCKETED  
FEB 17 1995

(If you need more space use additional paper and attach to this form).

4. What do you want the Public Utility Commission to do about your complaint?

We want you to tighten the reins on the P.A. Power and Light Company. We would like to see the P.U.C. get tough and really represent the people.

Thank you, kindly  
Paul Gatto

(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

Paul Gatto

2/11/95

Signature of complaining person, or officer

Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone Number-Area Code ( ) \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

Date Served:

February 17, 1995

R-00943271C0037

PENNSYLVANIA POWER & LIGHT CO.  
PAUL E. RUSSELL  
GENERAL COUNSEL  
TWO NORTH NINTH STREET  
ALLENTOWN, PA 18101-1179

DOCUMENT  
DOCUMENT  
FOLDER

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by **Paul Gatto**. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A PAYMENT SCHEDULE MAY BE PRESCRIBED OR A TERMINATION OF UTILITY SERVICES MAY BE AUTHORIZED. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

COMPANY/UTILITY

AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. 186  
Harrisburg, Pennsylvania 17108  
(800) 692-7375

Very truly yours,

for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 17, 1995

DOCUMENT  
FOLDER

Paul Gatto

Complainant :

v. :

Pennsylvania Power & Light Co. :

Respondent :

Complaint Docket

No. R-00943271C0037

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FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCKETED

FEB 17 1995

TO: Pennsylvania Power & Light Co.

**TAKE NOTICE:**

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120**, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code

Section 1.56(a).

2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes

or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

March 3, 1995

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

RECEIVED

MAR 3 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Re: **Paul Gatto v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0037**

Dear Secretary Alford:

Enclosed for filing in the above-captioned matter are an original and two copies of the "Answer of Pennsylvania Power & Light Company."

Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Paul Gatto  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Paul Gatto

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0037

RECEIVED

MAR 3 1995

CERTIFICATION OF SERVICE PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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

The Honorable Michael C. Schnierle  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Paul Gatto  
1065 Lincoln Street  
Dickson City, Pennsylvania 18519

Dated this 3rd day of March, 1995.



Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Paul Gatto

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0037

DOCKETED

MAR 7 1995

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RECEIVED FOLDER

MAR 3 1995

**ANSWER OF** PUBLIC UTILITY COMMISSION  
**PENNSYLVANIA POWER & LIGHT COMPANY** SECRETARY BUREAU

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Denied. By way of further answer, an analysis of PP&L's retail

rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the

Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%. The 20.7% increase cited in the Complaint is representative only for a residential customer using 500 KWH of electricity per month.

The level of increase proposed for each class of customers is fully supported by and is consistent with the cost allocation studies and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers.

Moreover, the proposed rates are fair and reasonable and, as shown by the supporting information in the filing, provide no more than a fair rate of return on PP&L's used and useful property. PP&L's studies show that its present rates do not adequately cover its current cost of providing electric service. The proposed rate increase is necessary to bring PP&L's rates for electric utility service more in line with the cost it incurs to provide that service.

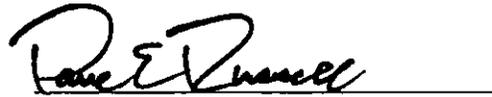
4. This paragraph constitutes a prayer for relief to which no answer is required.

WHEREFORE, in view of the foregoing, PP&L respectfully requests that the Commission dismiss the above-captioned Complaint.

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", is written over a horizontal line.

Paul E. Russell  
Its Attorney

Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: March 3, 1995  
at Allentown, Pennsylvania

