

R-00943271C0013  
110500



ORIGINAL

OFFICE OF SMALL BUSINESS ADVOCATE  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, Pennsylvania 17101

RECEIVED  
95 JAN 24 PM 2:47  
PA. P. U. C.  
INFO. CONTROL DIV.  
(717) 783-2525  
(717) 783-2831 (FAX)

Bernard A. Ryan, Jr.  
Small Business Advocate

January 24, 1995

John G. Alford, Secretary  
Pennsylvania Public Utility Commission  
Room B-18, North Office Building  
P. O. Box 3265  
Harrisburg, PA 17105

**Re: Pennsylvania Public Utility Commission v.  
Pennsylvania Power & Light Company  
Docket No. R-943271**

Dear Secretary Alford:

I am delivering for filing today the original plus three copies of the:

1. Complaint of the Small Business Advocate in the above captioned matter; and
2. Public Statement of the Small Business Advocate relating to the filing of that Complaint.

Copies of the Complaint and the Public Statement of the Small Business Advocate are being served today on all known parties in this proceeding. A Certificate of Service to that effect is enclosed.

Sincerely,

Karen Oill Moury  
Assistant Small Business Advocate

Enclosures

cc: Cheryl W. Davis, Director  
Office of Special Assistants

Parties of Record

**ORIGINAL**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION	:	
	:	
v.	:	Docket No. R-943271
	:	
PENNSYLVANIA POWER & LIGHT COMPANY	:	

**COMPLAINT OF  
SMALL BUSINESS ADVOCATE**

1. The Complainant is:

Bernard A. Ryan, Jr.  
Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101  
(717) 783-2525

2. The name and address of the Complainant's  
attorney is:

Karen Oill Moury  
Assistant Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101  
(717) 783-2525

3. The respondent utility is:

Pennsylvania Power & Light Company  
Two North Ninth Street  
Allentown, PA 18101-1179

4. The Complainant is authorized and directed by the  
Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§399.41 -  
399.50, to represent the interests of small business consumers of  
utility services in matters before the Pennsylvania Public Utility  
Commission ("Commission").

5. This complaint is filed against the rates, terms and other provisions of Supplement No. 50 to Tariff Electric - Pa. P.U.C. No. 200 of Pennsylvania Power & Light Company ("PP&L", "Respondent" or "Company"). The proposed supplement, if approved by the Commission, would increase the overall rates paid by Respondent's customers by approximately \$261 million, or 11.7%. Supplement No. 50 is intended to become effective for electric service rendered on and after February 28, 1995.

6. Upon preliminary review of the materials filed by Respondent in support of its proposed Supplement No. 50, Complainant believes and therefore avers that those materials may be insufficient to justify the rate increase requested, and that Respondent's present and proposed rates and conditions of service may be unjust, unreasonable and contrary to law.

7. Under proposed Supplement No. 50, the rate of return provided by the small general service class (Rate Schedule GS-1) would increase from an above system average return of 14.41% to an above system average return of 15.64%, according to the cost allocation study performed by the Company for the test year ending September 30, 1995 utilizing the 12 coincident peak methodology.

8. Although the Company's cost-of-service study indicates that the indexed rate of return for the small general service class is 1.97 under present rates, which is significantly higher than the indexed return for any other customer class, Respondent proposes to increase those rates by 3.89%.

9. PP&L requests an overall rate of return of 10.22%, including a return on common equity of 13.0%.

10. Complainant believes, and therefore avers, that PP&L's requested overall rate of return and return on common equity will provide an excessive return on the Company's investments, and the Company's proposed class rates of return will provide an excessive return by the Company's small business customers, and the proposed new rates therefore are unjust, unreasonable and contrary to law.

11. Complainant believes, and therefore avers, that Respondent's present and proposed tariff rules and rates, rate design and cost and revenue allocation are or may be unjust, unreasonable and unlawfully discriminatory in violation of, inter alia, sections 1301, 1303 and 1304 of the Public Utility Code, 66 P.S. §§1301, 1303 and 1304, and contrary to appropriate public policy and sound ratemaking considerations, and may not be supported by the materials filed by Respondent.

12. The Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

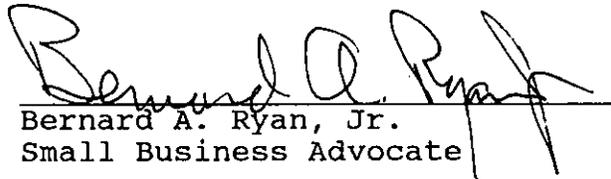
A. Suspend the effective date of the proposed tariff supplement to the full extent permitted by law;

B. Institute an investigation, including the holding of evidentiary and public input hearings before an assigned Administrative Law Judge, into the reasonableness and lawfulness of the rates contained in the proposed supplement;

C. At the conclusion of such investigation reject the proposed new rates and other tariff changes in Supplement No. 50 to Tariff No. 200 to the extent required to insure that Respondent's rates are just, reasonable and not unduly discriminatory to any class of customers, including small business consumers of PP&L's utility services as defined in the Act; and

D. Grant such other relief as may be necessary or appropriate.

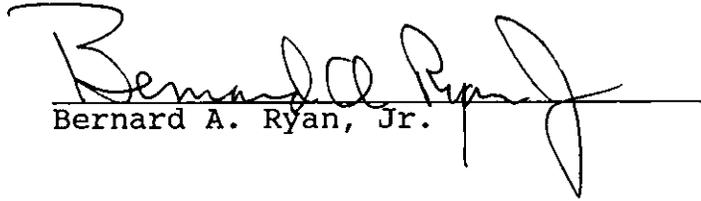
Respectfully submitted,

  
Bernard A. Ryan, Jr.  
Small Business Advocate

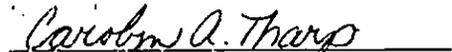
Dated: January 24, 1995

AFFIDAVIT

Bernard A. Ryan, Jr., being duly sworn according to law, says that the facts set forth above are true and correct to the best of his knowledge, information and belief and he expects to be able to prove them at the hearings in this proceeding.

  
Bernard A. Ryan, Jr.

Sworn and subscribed to  
before me this 24<sup>th</sup> day  
of *January*, 1995.

  
Notary Public

My Commission Expires:

NOTARIAL SEAL  
CAROLYN A. THARP, Notary Public  
Harrisburg, Dauphin County  
My Commission Expires Jan. 22, 1996

**PUBLIC STATEMENT OF  
SMALL BUSINESS ADVOCATE  
CONCERNING THE INTEREST  
OF SMALL BUSINESS CONSUMERS  
TO BE PROTECTED BY THE FILING OF A COMPLAINT  
AGAINST PROPOSED SUPPLEMENT NO. 50  
TO THE TARIFF OF PENNSYLVANIA POWER & LIGHT COMPANY**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§399.41 - 399.50 ("Act"). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a complaint against proposed Supplement No. 50 Tariff Electric - Pa. P.U.C. No. 200 of Pennsylvania Power & Light Company ("PP&L").

Proposed Supplement No. 50 would result in a revenue increase in the amount of approximately \$261 million, or 11.7%, above the level of rates now being charged to customers, including small business customers. The requested rate increase, if approved in full by the Commission, would also provide PP&L a 13.0% return on common equity. Of significant concern to the Small Business Advocate is the increase in revenues proposed for small business customers, particularly in view of the fact that the small general service class is presently providing a rate of return which is

almost twice the system average return, while the other retail customer classes are providing substantially lower returns.

The Small Business Advocate filed a formal complaint against PP&L's proposed rate increases in order to protect the interests of the utility's small business customers. A preliminary review of the data filed in support of the request for a rate increase indicates that the costs claimed for ratemaking purposes may be excessive. A thorough inquiry by the Public Utility Commission into all of the elements of this request for such a rate increase is necessary to ensure that the resultant rates, including any new rates that may be set in this proceeding, are just and reasonable.

The Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the rates and rules proposed by PP&L's Supplement No. 50. The Small Business Advocate will ask the Commission to deny any proposed rate increase and reject any other provisions in PP&L's present or proposed tariffs applicable to small business customers that are not proven by PP&L to be just, reasonable and non-discriminatory to all of its customer classes.

Dated: January 24, 1995

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :  
COMMISSION :  
 :  
v. : Docket No. R-943271  
 :  
PENNSYLVANIA POWER & LIGHT COMPANY :

CERTIFICATE OF SERVICE

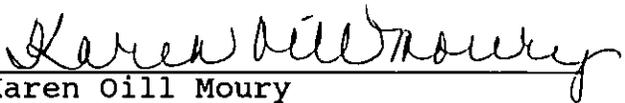
I certify that I am today serving copies of the Complaint and Public Statement of the Small Business Advocate by first class mail upon the persons addressed below:

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

Johnnie E. Simms, Esquire  
Kenneth L. Mickens, Esquire  
Stephen E. Gorka, Esquire  
Office of Trial Staff  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105

Tanya McCloskey, Esquire  
Mary C. Kenney, Esquire  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

David M. Kleppinger, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

  
Karen Oill Moury  
Assistant Small Business Advocate

Date: January 24, 1995

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

DATE SERVED: January 27, 1995

R-00943271C0013

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 Karen Oill Moury for Office of Small Business Advocate. 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.

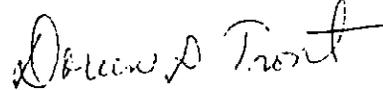
DOCUMENT  
FOLDER

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: January 27, 1995

Karen Oill Moury for  
Office of Small  
Business Advocate  
Complainant

Complaint Docket  
No: R-00943271C0013

VS.

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCKETED  
JAN 26 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**

February 16, 1995

**DOCUMENT  
FOLDER**

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: Office of Small Business Advocate**

**v.**

**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0013**

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: Karen Oill Moury, Esquire  
The Honorable Michael C. Schnierle



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Office of Small Business Advocate

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0013

DOCUMENT  
FOLDER

---

**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.
4. Admitted.

**DOCKETED**  
FEB 21 1995

5. Admitted. 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.

6. Denied. By way of further answer, 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.

7. Admitted. By way of further answer, 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.

8. Admitted in part, denied in part. PP&L admits that it proposes to increase rates for the small general service class by 3.89%. PP&L denies that the indexed rate of return for this class is "significantly higher" than the indexed return for any other class. See PP&L's answer to paragraph 7, above.

9. Admitted. By way of further answer, PP&L's proposed overall rate of return of 10.22% and proposed return on common equity of 13.0% are fair and reasonable and are fully supported by information and data provided in the filing.

10. Denied. See PP&L's answer to paragraphs 5, 6, 7 and 9, above.

11. Denied. See PP&L's answer to paragraphs 5, 6, 7 and 9, above.

PP&L's proposed rates are just and reasonable; are in full compliance with all

applicable provisions of the Public Utility Code; are consistent with public policy and sound ratemaking considerations; and are fully supported by the data and information provided in the filing.

12. 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 16, 1995  
at Allentown, Pennsylvania





R-00943271C0014  
110500

DEPARTMENT OF THE ARMY  
OFFICE OF THE JUDGE ADVOCATE GENERAL  
901 NORTH STUART STREET  
ARLINGTON, VA 22203-1837

ORIGINAL



REPLY TO  
ATTENTION OF

January 24, 1995

Regulatory Law Office  
U 3848

SUBJECT: Pennsylvania Public Utility Commission vs. Pennsylvania Power and Light Company, Pennsylvania P.U.C.  
Docket No. R 94-3271C0014

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

RECEIVED  
95 JAN 25 AM 8:32  
PA. P. U. C.  
INFO. CONTROL DIV.

Dear Mr. Alford:

Enclosed for filing are the original and ten copies of the Complaint on behalf of the consumer interest of the United States Department of Defense and other affected Executive Agencies in the above referenced proceeding.

Copies of this document are being sent in accord with the Certificate of Service. Inquiries to this office regarding this proceeding should be directed to the undersigned at (703) 696-1646.

Sincerely,

David A. McCormick  
General Attorney  
Regulatory Law Office

LDA

R-00943271C0014  
110500

**ORIGINAL**  
BEFORE THE

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission )  
vs. Pennsylvania Power and Light Com- )  
pany (Increased Rates for Electric Ser-) )  
vice )

Docket No. R 94-3271C0014

COMPLAINT

-----  
Robert N. Kittel  
Chief  
Regulatory Law Office  
Office of The Judge Advocate General  
Department of the Army  
DAJA-RL 3848  
901 North Stuart Street, Room 400  
Arlington, VA 22203-1837

For

THE DEPARTMENT OF DEFENSE AND  
THE FEDERAL EXECUTIVE AGENCIES

-----  
David A. McCormick  
Attorney

Of Counsel

Dated: 24 January 1995

RECEIVED  
95 JAN 25 AM 8:32  
PA. P. U. C. DIV.  
INFO. CONTROL

**BEFORE THE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission )  
vs. Pennsylvania Power and Light Com- )  
pany (Increased Rates for Electric Ser-) Docket No. R 94-3271  
vice )

**COMPLAINT**

**I**

The Secretary of Defense, through duly authorized counsel, on behalf of the consumer interest of the United States Department of Defense and other affected Federal Executive Agencies (collectively herein after "DOD") tenders this complaint and petition for leave to intervene in the above-styled application proceeding of the Pennsylvania Power and Light Company.

**II**

The name of the utility involved in this Complaint is the Pennsylvania Power and Light Company (hereinafter PP&L or Company).

**III**

That the name: address telephone and facsimile copier numbers of the attorney to whom communications in regard to this complaint and/or petition should be addressed is:

David A. McCormick  
General Attorney  
Regulatory Law Office  
Office of The Judge Advocate General  
Department of the Army  
DAJA-RL 3848  
901 N. Stuart Street, Room 713  
Arlington, VA 22203-1837

Telephone: (703) 696-1646  
FAX: (703) 696-2960

The Pennsylvania Attorney I.D. Number of David A. McCormick is 17357.

IV

That the DOD maintains military installations and civilian activities within the Commonwealth of Pennsylvania a number of which are served by PP&L. PP&L proposes in this application to increase rates for electric service by approximately 12 percent to increase jurisdictional revenues by \$261 million, annually. Given the magnitude of the proposed increase, PP&L's potential for off-system electric sales and the low recent levels of inflation, the proposed increase in level of rates is unreasonable.

V

The major federal facilities served by PP&L are Carlisle Barracks, Tobyhanna Army Depot, New Cumberland Army Depot, the Scranton Army Ammunition Plant and the Naval Supply Depot at Mechanicsburg, PA. If the proposed rates are granted in full, the impact on electric billings to DOD, alone, may exceed \$800,000

annually. The interest of the DOD is such that it cannot be adequately protected by any other party. DOD facilities have a large investment in electric distribution plant similar to a municipal utility. DOD facilities are served at higher voltages at substations. The usage characteristics, and mix of rate schedules (mostly LP-4 and LP-5) upon which DOD facilities buy electric service make their usage distinct from other large customers. DOD is a customer with a significant economic interest in this proceeding and would be affected by its outcome.

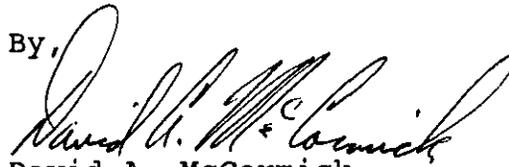
#### VI

That DOD plans to present evidence which will be of value to the Commission in its determination of the issues involved in this proceeding. DOD has not determined, at this time, how many or whether DOD will sponsor any witnesses in this proceeding. The intervention of DOD will neither unduly broaden the issues nor unduly delay the proceeding. If briefs are permitted, DOD plans to brief the issues in this proceeding, and to participate in cross examination at hearings.

WHEREFORE, DOD prays for leave to intervene and be treated as a party hereto with right to have notice of and appear at the taking of testimony, produce and cross examine witnesses, and be heard through counsel, upon brief and at oral argument, if oral

argument is granted. After hearing the evidence if any rate or revenue increase is allowed, the Commission should not permit PP&L to increase any rate unreasonably based upon cost of service. While DOD does not at this time question the proposed rate design of PP&L, DOD reserves the right to question the rate design and cost allocation methods of the utility if necessary in the proceeding.

By,



David A. McCormick  
Attorney

Regulatory Law Office  
Office of The Judge Advocate General  
Department of the Army (DAJA-RL 3848)  
901 North Stuart Street, Room 713  
Arlington, VA 22203-1837

CERTIFICATE OF SERVICE

I certify that I have caused a copy of the foregoing document to be sent this day, by postage prepaid, first class U.S. Mail to the following addressees:

PAUL E. RUSSELL, ESQUIRE  
LAW DEPARTMENT  
PENNSYLVANIA POWER & LIGHT COMPANY  
2 North Ninth Street  
ALLENTOWN, PA 18101-1179

JOHNNIE E. SIMMS, ESQUIRE  
KENNETH L. MICKENS, ESQUIRE  
OFFICE OF TRIAL STAFF  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265  
HARRISBURG, PA 17120

BERNARD RYAN, ESQUIRE  
OFFICE OF THE SMALL BUSINESS ADVOCATE  
SUITE 1102, COMMERCE BUILDING  
300 N. SECOND STREET  
HARRISBURG, PA 17101

TANYA J. McCLOSKEY, ESQUIRE  
ASSISTANT CONSUMER ADVOCATE  
OFFICE OF THE CONSUMER ADVOCATE  
1425 STRAWBERRY SQUARE  
HARRISBURG, PA 17120

MR. RAY VERBISH  
ENGINEERING PLANS & SERVICES  
US ARMY GARRISON  
CARLISLE BARRACKS  
CARLISLE, PA 17013-5002

D. JANE BRENNAN, ESQUIRE  
BRENNAN & ASSOCIATES  
1216 16TH STREET, N.W.  
WASHINGTON, D.C. 20036

MS. VICKI MACKLIN  
CONCERNED CITIZENS OF SCHULKILL  
COUNTY, INC.  
P.O. BOX 37  
McADOO, PA 18237

DAVID M. KLEPPINGER, ESQUIRE  
JAMES P. DOUGHERTY, ESQUIRE  
McNEES, WALLACE & NURICK  
P.O. BOX 1166  
100 PINE STREET  
HARRISBURG, PA 17108-1166

MICHAEL L. KURTZ, ESQUIRE  
BOEHM, KURTZ & LOWRY  
2210 SOCIETY BANK BUILDING  
36 EAST SEVENTH STREET  
CINCINNATI, OH 45202

STAFF JUDGE ADVOCATE  
US ARMY GARRISON (ATZE-JA)  
CARLISLE BARRACKS  
CARLISLE, PA 17013-5002

DANIEL P. DELANEY, ESQUIRE  
KIRKPATRICK & LOCKHART  
240 NORTH THIRD STREET  
HARRISBURG, PA 17101-1503

STAFF JUDGE ADVOCATE  
TOBYHANNA ARMY DEPOT  
ATTN: SDSSTO-JD  
TOBYHANNA, PA 18466-5054

MR. DONALD STITLER  
GENERAL SERVICES ADMINISTRATION  
WANNAMAKER BUILDING, ROOM 719  
100 PENN SQUARE EAST  
PHILADELPHIA, PA 19107

MR. GARY H. BOOTAY  
6 MANOR DRIVE, KIMBERLY MEADOWS  
MECHANICSBURG, PA 18237

MR. JAMES R. BROKENSHERE  
599 EISENHOWER BOULEVARD  
HARRISBURG, PA 17111-2397

MR. JAMES A. BAKER  
119 WEST COOVER STREET  
MECHANICSBURG, PA 17055

MS. ELAINE SCHEIDLER  
1130 LOOP DRIVE  
HARRISBURG, PA 17112-2151

MR. HAROLD C. LANDES  
2680 OLD BETHLEHEM PIKE  
QUAKERTOWN, PA 18951

MS. LAURA N. HAGER  
224 WEST WALNUT STREET  
LANCASTER, PA 17603

Dated this 24th day of January, 1995, at Arlington County, Virginia.

  
David C. McCowan

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

DATE SERVED: January 27, 1995

R-00943271C0014

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 David A. McCormick, General Attorney for Department of the Army. 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.

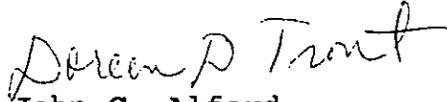
DOCUMENT  
FOLDER

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: January 27, 1995

David A. McCormick,  
General Attorney for  
Department of the Army  
Complainant

DOCKETED  
JAN 26 1995

Complaint Docket  
No: R-00943271C0014

VS.

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

DOCUMENT  
FOLDER

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 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: Department of the Army**  
**v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0014**

**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: David A. McCormick, Esquire  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Department of the Army

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0014

---

**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

David A. McCormick, Esquire  
General Attorney, Regulatory Law Office  
Office of the Judge Advocate General  
Department of the Army  
901 N. Stuart Street, Room 713  
Arlington, VA 22203-1837

Dated this 16th day of February.



---

Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Department of the Army

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0014

DOCUMENT  
FOLDER

ANSWER OF

PENNSYLVANIA POWER & LIGHT COMPANY

**DOCKETED**

FEB 21 1995

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

I. Admitted.

II. Admitted.

III. Admitted.

IV. Admitted in part, denied in part. PP&L admits that the Department of Defense (DOD) maintains military installations and civilian activities within the Commonwealth of Pennsylvania and that PP&L serves the number of these installations. PP&L admits that it has requested an increase in retail base rates of approximately \$261 million, or 11.7%. All other allegations are 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 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.

V. Admitted in part, denied in part. PP&L admits that it provides services to federal facilities at Carlisle Barracks, Tobyhanna Army Depot, New Cum-

berland Army Depot, the Scranton Army Ammunition Plant and the Naval Supply Depot at Mechanicsburg, Pennsylvania. PP&L is without sufficient knowledge or information to respond to Complainant's statements regarding the operation of these facilities or the impact of the proposed base rate increase upon them.

VI. Denied. PP&L is without knowledge or information sufficient to respond to Complainant's statements regarding its anticipated scope of intervention in this proceeding.

The WHEREFORE clause of the Complaint 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



**ORMAL COMPLAINT FORM**  
**Pennsylvania Public Utility Commission**

R-00943271C0015  
110500

**ORIGINAL**

**RECEIVED**  
95 JAN 25 AM 10:06  
PA. P. U. C.  
INFO. CONTROL DIV.

Please Print:

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

Name Linda M. Fetter  
Street/P.O. Box 13355 9th St. Apt# 6  
City Allentown State PA Zip 18103  
County Lehigh Home Telephone-Area Code (610) 740-9479  
Work Telephone-Area Code ( )

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

Name of Company Pennsylvania Power & Light Co.

**3. What is your complaint?**

I believe an increase of 20.7% is extravagant.  
In an economy such as this we must all  
lighten our spending. This increase would be  
a personal hardship for me. Therefore I ask  
you please deny this increase. Thank you.

**DOCKETED**  
JAN 26 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?

Please deny this 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.

Leidsmaletter  
Signature of complaining person, or officer

1-21-95  
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  
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: January 27, 1995

R-00943271C0015

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

LDA

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Linda M. Fetter. 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.

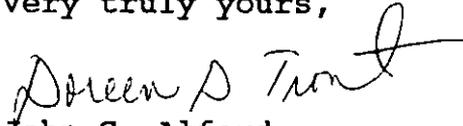
DOCUMENT  
FOLDER

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: January 27, 1995

DOCKETED  
JAN 26 1995

Linda M. Fetter  
Complainant

VS.

Complaint Docket  
No: R-00943271C0015

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

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).

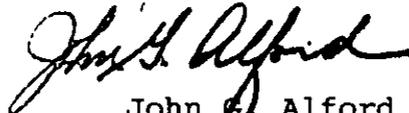
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

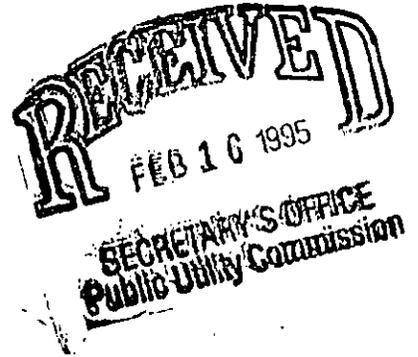
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

Re: Linda M. Fetter v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0015

**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: Ms. Linda M. Fetter  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Linda M. Fetter

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0015

---

**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

Ms. Linda M. Fetter  
1335 South 9th Street  
Apartment 6  
Allentown, Pennsylvania 18103

Dated this 16th day of February.



Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Linda M. Fetter

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0015

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. PP&L does not have information or knowledge sufficient 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

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.

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-00943271C0016  
110500

DOCKETED  
JAN 26 1995

Please Print:

ORIGINAL

1. Your Name, Mailing Address and Telephone Number

Name CHARLOTTE RACKLEY  
Street/P.O. Box 1817 GREEN ST Apt# HOUSE  
City HARRISBURG State PA Zip 17102  
County DAUPHIN Home Telephone-Area Code (717) 254-2722  
Work Telephone-Area Code ( )

RECEIVED  
JAN 25 AM 10:23  
P.P.U.C.  
CONTROL DIV

2. Which company does your complaint concern?

Name of Company P.P. & L Co

3. What is your complaint?

I feel the \$10 rise in P.P.&L rates is beyond my means as well as many others. I am on a very fixed income and this would be a big burden on me. Re. advised that I am a home bound medicare patient and my electricity is imparative to my well being. I receive Skilled Nursing Services through Staff Builders Home Health Care.

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?

STOP THE HIGH RATE COST

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(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.

Charlotte Rackley

1-23-94

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: January 27, 1995

R-00943271C0016

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 Charlotte Rackley. 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.

LDA

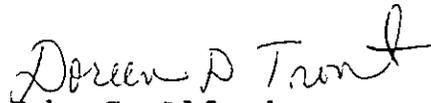
DOCUMENT  
FOLDER

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: January 27, 1995

Charlotte Rackley  
Complainant

VS.

Complaint Docket  
No: R-00943271C0016

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

**DOCKETED**  
JAN 26 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. Afford  
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

**DOCUMENT  
FOLDER**

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

**RECEIVED**  
FEB 16 1995

**Re: Charlotte Rackley v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0016**

**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: Ms. Charlotte Rackley  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Charlotte Rackley

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0016

---

**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

Ms. Charlotte Rackley  
1817 Green Street  
Harrisburg, Pennsylvania 17102

Dated this 16th day of February.



---

Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Charlotte Rackley

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0016

DOCUMENT  
RECORDED

**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. PP&L does not have information or knowledge sufficient 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

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.

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 16, 1995  
at Allentown, Pennsylvania



**ORMAL COMPLAINT FORM**  
**Pennsylvania Public Utility Commission**

PA. P. U. C.  
INFO. CONTROL DIV.

95 JAN 27 AM 9:24

RECEIVED

Please Print:

R-9432710017

ORIGINAL

1. Your Name, Mailing Address and Telephone Number

Name Robert & Susie (et al) M. Bell Jr

Street/P.O. Box Rd 3 Box 1406 Apt#

City Mifflintown State PA Zip 17059

County Juniata Home Telephone-Area Code (717) 436-6840

Work Telephone-Area Code (717) 436-2193

2. Which company does your complaint concern?

Name of Company PP&L

DOCUMENT  
FOLDER

3. What is your complaint?

the recent issue of PP&L wanting to  
raise electricity rates.

DUCKETED

JAN 27 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 the P.U.C. to put a stop to P.P&L wanting to raise our rates.

P.S. if there is a hearing on this matter we would only be able to do this by phone.

(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.

Susie M. (et al) & Robert W. Bellon 11/23/95  
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

IN REPLY PLEASE  
REFER TO OUR FILE

January 30, 1995

DOCUMENT  
FOLDER

R1943271C0017

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

A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **ROBERT W & SUSIE M BELL, JR., ET AL.** 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

LDA

Very truly yours,

lpw  
Attachment

for: John G. Alford, Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
January 24, 1995

---

DOCUMENT  
FOLDER

ROBERT W & SUSIE M BELL, JR., ET AL

Complaint Docket  
No. R-943271C0017

v.

PENNSYLVANIA POWER & LIGHT

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCKETED  
JAN 27 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

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: Robert W. & Susie M. Bell, Jr., et al. v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0017

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: Robert W. & Susie M. Bell, Jr.  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Robert W. & Susie M. Bell, Jr., et al. :  
 :  
 v. : Complaint Docket  
 : No. R-00943271C0017  
 :  
 Pennsylvania Power & Light :  
 Company :  
 :

---

**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

Robert W. & Susie M. Bell, Jr., et al.,  
RD 3, Box 1406  
Mifflintown, Pennsylvania 17059

Dated this 16th day of February.



---

Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Robert W. & Susie M. Bell, Jr., et al.

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0017

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 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.

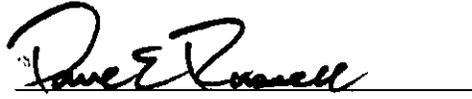
4. This paragraph constitutes a prayer for relief to which no answer is required.

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:

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 16, 1995  
at Allentown, Pennsylvania



**NORMAL COMPLAINT FORM**  
**Pennsylvania Public Utility Commission**

ORIGINAL

Please Print:

R-943271 C0018

DOCUMENT  
FOLDER

PA. P.U.C.  
INFO. CONTROL DIV.

95 JAN 27 AM 9:24

RECEIVED

1. Your Name, Mailing Address and Telephone Number

Name Ethel Richardson

Street/P.O. Box R.D. 3 Box 1383 Apt#

City Mifflintown State PA Zip 17059

County Juniata Home Telephone-Area Code (717) 436-2867

Work Telephone-Area Code ( )

2. Which company does your complaint concern?

Name of Company Pa. Power & Light Co.

3. What is your complaint?

I feel a increase in the proposed rate should not be  
increased, especially some of us who are on a fixed  
income, and others who may have a low income

DOC  
JAN 27 1995

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

LDA

(-over-)

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

To not increase the electric rates  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(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.

Ethel Richardson  
\_\_\_\_\_

1/26/95  
\_\_\_\_\_

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 ( ) \_\_\_\_\_

68  
119  
71



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

IN REPLY PLEASE  
REFER TO OUR FILE

January 30, 1995

DOCUMENT  
FOLDER

R-943271C0018

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

A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **ETHEL RICHARDSON**. 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

LDA

Very truly yours,

lpw  
Attachment

for: John G. Alford, Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
January 24, 1995

DOCUMENT  
FOLDER

ETHEL RICHARDSON

Complaint Docket  
No. R-943271C0018

v.

PENNSYLVANIA POWER & LIGHT

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

DOCKETED  
JAN 27 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

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: **Ethel Richardson v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0018**

**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: Ms. Ethel Richardson  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Ethel Richardson

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0018

---

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

Ms. Ethel Richardson  
RD 3, Box 1383  
Mifflintown, Pennsylvania 17059

Dated this 16th day of February.



---

Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Ethel Richardson

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0018

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 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:

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 16, 1995  
at Allentown, Pennsylvania

