

ORIGINAL

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0038
110500

RECEIVED
95 FEB 13 AM 11:02
PA. P. U. C.
INFO. CONTROL DIV.

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name Freyman, Dorothy Louise
Street/P.O. Box 4135 Mink Rd Apt# —
City Emmaus State Pa Zip 18049
County Lehigh Home Telephone-Area Code (610) 967-3803
Work Telephone-Area Code () natched

2. Which company does your complaint concern?

Name of Company Pennsylvania Power + Light

3. What is your complaint?

I feel a 21% rate increase is too
large. As a senior citizen living on
social security and pension, a more
modest increase for the Electric Co.
seems appropriate.

DOCUMENT
FOLDER

DOCKETED
FEB 17 1995

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

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

Reduce the rate of 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.

Donohy L. Freeman

1/28/95

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

Date Signed

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

Date Served:

February 17, 1995

R-00943271C0038

PENNSYLVANIA POWER & LIGHT CO.
PAUL E. RUSSELL
GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN, PA 18101-1179

DOCUMENT
FOLDER

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

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

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

Very truly yours,

for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 17, 1995

DOCUMENT
FOLDER

Dorothy Louise Freyman
Complainant :
 :
 :
 V. : **Complaint Docket**
 : **No. R-00943271C0038**
 :
 Pennsylvania Power & Light Co. :
 Respondent :

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: Pennsylvania Power & Light Co.

DOCKETED
FEB 17 1995

TAKE NOTICE:

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

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

Section 1.56(a).

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

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

FAX: 610/774-6726

March 3, 1995

RECEIVED

MAR 3 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

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

**Re: Dorothy Louise Freyman v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0038**

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. Dorothy Louise Freyman
The Honorable Michael C. Schnierle

DOCUMENT
FOLDER

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Dorothy Louise Freyman

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0038

RECEIVED

MAR 3 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

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. Dorothy Louise Freyman
4135 Mink Road
Emmaus, Pennsylvania 18049

Dated this 3rd day of March, 1995.



Paul E. Russell

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

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

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

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

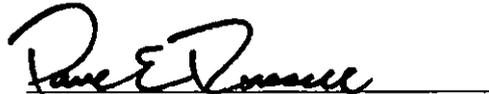
4. This paragraph constitutes a prayer for relief to which no answer is required.

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

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

Paul E. Russell
Its Attorney

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

Dated: March 3, 1995
at Allentown, Pennsylvania

ORIGINAL

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0039

95 FEB 13 AM 11:02

Please Print:

110500

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

1. Your Name, Mailing Address and Telephone Number

Name Geraldine L. Miller

Street/P.O. Box 7028 Sell Road Apt#

City Zionsville State Pa. Zip 18092

County Lehigh Home Telephone-Area Code (610) 966-2897

Work Telephone-Area Code () --

2. Which company does your complaint concern?

Name of Company P.P.&L Co. Allentown, Pa.

DOCUMENT
FOLDER

DOCKETED

FEB 17 1995

3. What is your complaint?

I am protesting the proposed rate increase by P.P.& L Co. Last year our electric bill was over \$2,600.00 as we are totally electric. I am retired and my husband will soon be retiring and I don't see how he can retire with utilities and taxes going sky high. People don't get increases in pensions other than Social Security and then they always put the Medicare up and you land up with practically no increase at all. I don't see why P P & L customers should have to pay for the early retirement of their employees from the company so they can save money. and then they want to get that money back by expecting its customers to pay for it. I don't think thats fair. They save money by reducing their force and then they want double savings by expecting us to pay for it.

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

(-over-)

17

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

Date Served:

February 17, 1995

R-00943271C0039

PENNSYLVANIA POWER & LIGHT CO.
PAUL E. RUSSELL
GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN, PA 18101-1179

DOCUMENT
FOLDER

Dear Mr. Russell:

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

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

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

Very truly yours,

for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 17, 1995

DOCUMENT
FOLDER

Geraldine L. Miller
Complainant :
 :
 v. : Complaint Docket
 : No. R-00943271C0039
 Pennsylvania Power & Light Co. :
 Respondent :

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
FEB 17 1995

TO: Pennsylvania Power & Light Co.

TAKE NOTICE:

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

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

Section 1.56(a).

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

ORIGINAL



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

March 3, 1995

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

RECEIVED

MAR 3 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

Re: **Geraldine L. Miller v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0039

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. Geraldine L. Miller
The Honorable Michael C. Schnierle

DOCUMENT
FOLDER

83

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED

MAR 7 1995

Geraldine L. Miller

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0039

RECEIVED

MAR 3 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

**DOCUMENT
FOLDER**

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:



Paul E. Russell
Its Attorney

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

Dated: March 3, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0040
110500

RECEIVED

95 FEB 13 AM 11:02

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

ORIGINAL
Please Print

1. Your Name, Mailing Address and Telephone Number

Name Mr. and Mrs. William Williambrand

Street/P.O. Box 111 Lone Lane Apt#

City Allentown State PA Zip 18104

County Lehigh Home Telephone-Area Code (610) 395-9161

Work Telephone-Area Code ()

2. Which company does your complaint concern?

Name of Company PP&L

3. What is your complaint?

The proposed 20% increase of residential rates requested by PP&L.

DOCUMENT
FOLDER

DOCKETED
FEB 17 1995

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

16

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

Deny PP&L this outrageous increase in residential rates.

This increase, in our opinion, is just for the stockholders
profitability and would place a great burden on our ever-
struggling budget.

(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.

Catherine Hefflanbram
William B. Hefflanbram

2/10/95

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

Date Served:

February 17, 1995

R-00943271C0040

PENNSYLVANIA POWER & LIGHT CO.
PAUL E. RUSSELL
GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN, PA 18101-1179

DOCUMENT
FOLDER

Dear Mr. Russell:

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

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

Very truly yours,

for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 17, 1995

DOCUMENT
FOLDER

Mr. & Mrs. William Hillanbrand
Complainant :
 :
 V. : **Complaint Docket**
 : **No. R-00943271C0040**
 Pennsylvania Power & Light Co. :
 Respondent :

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: Pennsylvania Power & Light Co.

DOCKETED
FEB 17 1995

TAKE NOTICE:

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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

ORIGINAL



Pennsylvania Power & Light Company

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

KJF

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

FAX: 610/774-6726

March 3, 1995

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

RECEIVED

MAR 3 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

**Re: Mr. & Mrs. William Hillanbrand v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0040**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. & Mrs. William Hillanbrand
The Honorable Michael C. Schnierle

DOCUMENT
FOLDER

86

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mr. & Mrs. William Hillanbrand

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0040

RECEIVED

MAR 3 1995

CERTIFICATION OF SERVICE

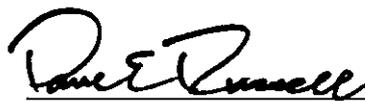
PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

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

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

Mr. & Mrs. William Hillanbrand
111 Lone Lane
Allentown, Pennsylvania 18104

Dated this 3rd day of March, 1995.



Paul E. Russell

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mr. & Mrs. William Hillanbrand

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0040

DOCKETED

MAR 7 1995

RECEIVED

MAR 3 1995

ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

DOCUMENT
FOLDER

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

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

to respond to Complainants' statements regarding their personal finances.

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

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:



Paul E. Russell
Its Attorney

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

Dated: March 3, 1995
at Allentown, Pennsylvania

ORIGINAL

FORMAL COMPLAINT FORM

Pennsylvania Public Utility Commission

R-00943271C0041

110500

95 FEB 13 AM 11:02

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

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name KERMIT L. LINK

Street/P.O. Box 4135 LINK ROAD Apt#

City EMMAUS, State PA. Zip 18049

County Lehigh Home Telephone-Area Code (610) 967-3803

Work Telephone-Area Code ()

DOCUMENT FOLDER

2. Which company does your complaint concern?

Name of Company PA. Power + Light

DOCKETED

FEB 11 1995

3. What is your complaint?

21% is far too HIGH AN INCREASE, I feel
That it is NOT justified in case of Home Heating,
Residential-Service. AS we are senior citizens
also young people cannot keep up with these
STANDARDS, of life like 21% its a terrible High
INCREASE we seniors live on a fixed income which
was set years ago there must be a better way to
ATTACK this problem like cost saving in
manufacturing of the electricity

(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?

Look in ToO This problem, Study it, Look AT
other power MANUFACTURING COMPANYS. See if it
is Really needed

(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.

Kenneth L. Smith

Jan 30 - 95

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

Date Signed

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

Date Served:

February 17, 1995

R-00943271C0041

PENNSYLVANIA POWER & LIGHT CO.
PAUL E. RUSSELL
GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN, PA 18101-1179

DOCUMENT
FOLDER

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

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

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

Very truly yours,

for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 17, 1995

DOCUMENT
FOLDER

Kermit L. Link
Complainant :
 :
 :
 V. : **Complaint Docket**
 : **No. R-00943271C0041**
 :
 Pennsylvania Power & Light Co. :
 Respondent :

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
FEB 17 1995

TO: Pennsylvania Power & Light Co.

TAKE NOTICE:

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

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

Section 1.56(a).

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

ORIGINAL

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

FAX: 610/774-6726

March 8, 1995

RECEIVED
MAR 9 9:08
INFO. CONTROL DIV.

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

Re: **Kermit L. Link v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0041**

RECEIVED
MAR 8 1995

SECRETARY'S OFFICE
Public Utility Commission

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Kermit L. Link
The Honorable Michael C. Schnierle

DOCUMENT
FOLDER

3-8-95

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED

MAR 14 1995

Kermit L. Link

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0041

RECEIVED
MAR 8 1995

SECRETARY'S OFFICE
Public Utility Commission

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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

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

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

DOCUMENT
FOLDER

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:



Paul E. Russell
Its Attorney

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

Dated: March 8, 1995
at Allentown, Pennsylvania

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Kermit L. Link

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0041

CERTIFICATION OF SERVICE

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

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

Mr. Kermit L. Link
4135 Mink Road
Emmaus, Pennsylvania 18049

Dated this 8th day of March, 1995.



Paul E. Russell

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

ORIGINAL

Please Print:

R--00943;71C0042
110500

RECEIVED
95 FEB -9 AM 10:50
PA. P.U.C. DIV.
INFO. CONTROL

Your Name, Mailing Address and Telephone Number

Name W. Gilbert Co

Street/P.O. Box P.O. Box 408 Apt# _____

City HALIFAX State PA Zip 17032

County DAUPHIN Home Telephone-Area Code (717) 896-3135

Work Telephone-Area Code (717) 896-8550

2. Which company does your complaint concern?

Name of Company PPEL CO ELECTRIC UTILITY

3. What is your complaint?

I OPPOSE PPEL'S PROPOSED 20%+ RATE INCREASE
AIMED AT USERS OF 500^{KW} MONTHLY BILLS

THIS 20.7% RATE INCREASE IS UNFAIR TO THE SMALL
ELECTRIC CONSUMER, AND DIS PRO PORTIONATELY INCREASES
THEIR BURDEN TO PAY FOR ELECTRIC UTILITIES.

THEIR INCREASE IF ANY SHOULD BE ACROSS THE BOARD
AND MIRROR INCREASE COSTS AS REFLECTED IN THE
INFLATION INDEX, I.E. 2 TO 3% AS PROPOSED FOR
THEIR 1500 KW MONTHLY CUSTOMERS.

DOCUMENT

DOCKETED
FEB 17 1995

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

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

PLEASE REFUSE PPEL'S REQUEST FOR RATE INCREASE EFFECTIVE FEB 28, 1995.

DO NOT UNFAIRLY ALLOW PPEL TO PENALIZE CUSTOMERS USING 500 KW MONTHLY.

ALLOW PPEL ONLY FAIR REASONABLE ACROSS THE BOARD RATE INCREASE, THAT MIRRORS INFLATION INDEX.

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

5. You must sign and date your complaint.

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

Walter Guller

FEB 8, 1995

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

Date Served:

February 17, 1995

R-00943271C0042

PENNSYLVANIA POWER & LIGHT CO.
PAUL E. RUSSELL
GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN, PA 18101-1179

DOCUMENT
FOLDER

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

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

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

Very truly yours,

for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 17, 1995

DOCUMENT
FOLDER

W. Gilbert Co.

Complainant

v.

Pennsylvania Power & Light Co.

Respondent

:
:
:
:
:
:

Complaint Docket

No. R-00943271C0042

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED

FEB 17 1995

TO: Pennsylvania Power & Light Co.

TAKE NOTICE:

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

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

Section 1.56(a).

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

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

FAX: 610/774-6726

ORIGINAL

March 8, 1995

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

RECEIVED
MAR 8 1995

SECRETARY'S OFFICE
Public Utility Commission

Re: **W. Gilbert Co. v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0042

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: W. Gilbert Co.
The Honorable Michael C. Schnierle

DOCUMENT
FOLDER

3-8

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED

MAR 14 1995

W. Gilbert Co.

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0042

RECEIVED
MAR 8 1995

SECRETARY'S OFFICE
Public Utility Commission

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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

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

DOCUMENT
FOLDER

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

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

Paul E. Russell
Its Attorney

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

Dated: March 8, 1995
at Allentown, Pennsylvania

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

W. Gilbert Co.

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0042

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

W. Gilbert Co.
P.O. Box 408
Halifax, Pennsylvania 17032

Dated this 8th day of March, 1995.



Paul E. Russell

ORIGINAL

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0043
110500

RECEIVED
95 FEB -9 AM 10:49
PA. P. U. C.
INFO. CONTROL DIV.

1. Your Name, Mailing Address and Telephone Number

Name VINCENT PAUL ANGELO JR.
Street/P.O. Box 323 MARKET ST. PO BOX 373 Apt# _____
City AUBURN State PA Zip 17922-0373
County SCHUYLKILL Home Telephone-Area Code (717) 754-3143
Work Telephone-Area Code (717) 622-1360 EXT 41

DOCUMENT
FILED

2. Which company does your complaint concern?

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

DOCKETED
FEB 17 1995

3. What is your complaint?

AFTER READING ABOUT THE PROPOSED RATE INCREASE BY PP&L, I FEEL COMPELLED TO VOICE MY
OPINION AS A GOOD PAYING CUSTOMER OF PP&L. PP&L HAS REQUESTED A RATE INCREASE OF \$261
MILLION PER YEAR. THE PROPOSED INCREASE OF 20.7 % FOR RESIDENTIAL CUSTOMERS IS ABSURD!
THE REASON THAT IT IS ABSURD, IS THE FACT THAT THE PROPOSED INCREASE FOR COMMERCIAL
CUSTOMERS IS ONLY 2.4%. THE PROPOSED INCREASE FOR INDUSTRIAL CUSTOMERS WOULD INCREASE
BY ONLY 9.1%. IF AN INCREASE IS NEEDED BY PP&L TO CONTINUE PROVIDING THE SERVICE THAT
THEY DO PROVIDE, I SUGGEST THAT THE RATIO BETWEEN RESIDENTIAL, COMMERCIAL, AND INDUSTRIAL
CUSTOMERS BE MADE MORE EQUAL. WHY DIDN'T PP&L PROVIDE A CHART SHOWING THE BREAKDOWN
OF USAGE BETWEEN THOSE THREE CATEGORIES OF CUSTOMERS? I FEEL THAT THE AVERAGE RESIDENTIAL
CUSTOMER IS BEING RIPPED OFF! MOST RESIDENTIAL CUSTOMERS DO NOT TAKE THE TIME TO READ
THE VARIOUS INSERTS IN EACH MONTHLY BILL. I THINK THAT IF PP&L WANTED TO BE MORE
FAIR IN THIS MATTER, THEN THEY SHOULD HAVE INCLUDED THE NOTICE RIGHT ON OUR MONTHLY BILLS!
THEY ARE MAKING IT DIFFICULT TO KNOW WHY THEY HAVE SUCH A DISPARITY IN THE DIFFERENT
RATES. NOT EVERYONE HAS THE TIME TO WRITE LETTERS REQUESTING SUCH INFORMATION.

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

20

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

I WOULD LIKE THE PUBLIC UTILITY COMMISSION TO EXAMINE THE PRECISE REASONS OF WHY PP&L IS REQUESTING THESE RATE HIKES. I KNOW THAT I AM IN THE MINORITY WHEN IT COMES TO WRITING TO THE PUC TO OBJECT TO THESE RATE INCREASES, HOWEVER I BELIEVE THAT I AM IN THE MAJORITY OF THOSE WHO DO NOT WANT TO PAY 20.7% AS RESIDENTIAL CUSTOMERS AS OPPOSED TO THE 9.1 % FOR INDUSTRIAL CUSTOMERS AND 2.4 % FOR COMMERCIAL CUSTOMERS. IT IS ONLY LOGICAL TO ASSUME THAT MOST RESIDENTIAL CUSTOMERS WOULD INDEED BE OPPOSED TO THIS UNFAIRNESS IN BILLING. I ALSO REALIZE THAT ONLY A SMALL PERCENTAGE OF RESIDENTIAL CUSTOMERS WILL ACTUALLY WRITE TO OFFICIALLY COMPLAIN ABOUT THIS MATTER. I DO HEREBY REQUEST THAT I BE GIVEN THE OPPORTUNITY TO VOICE MY OPINION AT A PUC HEARING REGARDING THIS MATTER.

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

5. You must sign and date your complaint.

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



07 FEBRUARY 1995

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

Date Signed

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

Date Served:

February 17, 1995

R-00943271C0043

PENNSYLVANIA POWER & LIGHT CO.
PAUL E. RUSSELL
GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN, PA 18101-1179

DOCUMENT
FOLDER

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

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

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

Very truly yours,

for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 17, 1995

DOCUMENT
FOLDER

Vincent Paul Angelo, Jr.
Complainant :
 :
 :
 V. : **Complaint Docket**
 : **No. R-00943271C0043**
 :
 Pennsylvania Power & Light Co. :
 Respondent :

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
FEB 17 1995

TO: Pennsylvania Power & Light Co.

TAKE NOTICE:

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

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

Section 1.56(a).

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

ORIGINAL

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

FAX: 610/774-6726

March 8, 1995

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

RECEIVED
MAR 8 1995

RECEIVED
95 MAR 9 9:10
INFO. CONTROL DIV.

SECRETARY'S OFFICE
Public Utility Commission

Re: **Vincent Paul Angelo, Jr. v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0043**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Vincent Paul Angelo, Jr.
The Honorable Michael C. Schnierle

DOCUMENT
FOLDER

3-8
66

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Vincent Paul Angelo, Jr.

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0043

DOCKETED
MAR 14 1995

RECEIVED
MAR 8 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

CLERK'S OFFICE
Public Utility Commission

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

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

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

DOCUMENT
FOLDER

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

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

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

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

By way of further answer, PP&L's notice of the proposed base rate increase was in full compliance with the Commission's regulations regarding notice of new tariffs and tariff supplements, 52 Pa. Code § 53.45, et seq.

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

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

Paul E. Russell
Its Attorney

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

Dated: March 8, 1995
at Allentown, Pennsylvania

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Vincent Paul Angelo, Jr.

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0043

CERTIFICATION OF SERVICE

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

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

Mr. Vincent Paul Angelo, Jr.
323 Market Street, P. O. Box 373
Auburn, Pennsylvania 17922-0373

Dated this 8th day of March, 1995.



Paul E. Russell

ORIGINAL

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0044

110500

Please Print:

RECEIVED
95 FEB 14 AM 9:16
PA. P. U. C.
INFO. CONTROL DIV.

1. Your Name, Mailing Address and Telephone Number

Name Agnes and Harry Baumer

Street/P.O. Box 7 South Water St Apt# B

City Hummelstown State Pa. Zip 17036

County Dauphin Home Telephone-Area Code (717) 566-6095

Work Telephone-Area Code ()

DOCKETED
FEB 17 1995

2. Which company does your complaint concern?

Name of Company Pennsylvania Power and Light

3. What is your complaint?

I am complaining about P & P & L's
proposed rate increase of 20.7% for
residential customers. if ~~PP&L~~ PP&L hasn't
raised rates since 1984, why do they want a
huge increase all at once? Why couldn't
they have raised their rates a small
amount each year from 1984 so that the
customers would be able to absorb these
small increases? I'm sure many customer's will
not be able to afford a sudden increase
of a ridiculous amount like 20.7%
especially those of us who have electric heat.

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

(-over-)

DOCUMENT
FOLDER

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

To not allow P P & L to have this 20.7% increase. Preferably, not to allow them to have any increase. From what I understand P P & L is a very wealthy company which owns large tracts of land in the state. Let them sell some of their land if they want money to pay their retirees' pensions.

(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.

Harry A. Baumer
Agnes E. Baumer

Feb. 9, 1995

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

KJR

Date Served:

February 17, 1995

R-00943271C0044

PENNSYLVANIA POWER & LIGHT CO.
PAUL E. RUSSELL
GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN, PA 18101-1179

DOCUMENT
FOLDER

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

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

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

Very truly yours,

for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 17, 1995

DOCUMENT
FOLDER

Agnes & Harry Baumer
Complainant :
 :
 :
 V. : **Complaint Docket**
 : **No. R-00943271C0044**
 :
 Pennsylvania Power & Light Co. :
 Respondent :

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
FEB 17 1995

TO: Pennsylvania Power & Light Co.

TAKE NOTICE:

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

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

Section 1.56(a).

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

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

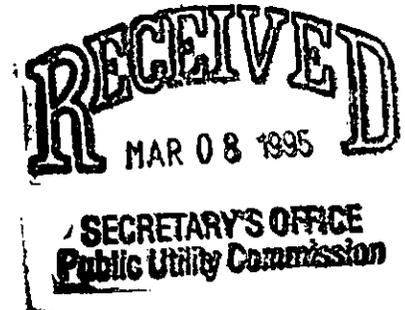
FAX: 610/774-6726

ORIGINAL

**DOCUMENT
FOLDER**

March 8, 1995

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



**Re: Agnes & Harry Baumer v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0044**

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: Agnes & Harry Baumer
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
MAR 08 1995

SECRETARY'S OFFICE
Public Utility Commission

Agnes & Harry Baumer

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0044

DOCUMENT
FOLDER

DOCKETED
MAR 10 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 knowledge and information sufficient to respond to Complainants' statements regarding their personal finances.

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

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

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

Paul E. Russell
Its Attorney

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

Dated: March 8, 1995
at Allentown, Pennsylvania

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Agnes & Harry Baumer

v.

Pennsylvania Power & Light
Company

:
:
: Complaint Docket
: No. R-00943271C0044
:
:
:

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

Agnes & Harry Baumer
7 South Water Street
Hummelstown, Pennsylvania 17036

Dated this 8th day of March, 1995.



Paul E. Russell

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

ORIGINAL

R-00943271C0045

110500-

DOCUMENT FOLDER

INFO. CONTRL. DIV.

95 FEB 14 AM 9:15

RECEIVED

KJR

1. Your Name, Mailing Address and Telephone Number

Name Diane McKinley
Street/P.O. Box 190 Hill Road Apt#
City Danville State PA Zip 17821
County Northumberland Home Telephone-Area Code (717) 275-7528
Work Telephone-Area Code ()

2. Which company does your complaint concern?

Name of Company Pennsylvania Power and Light

3. What is your complaint?

This formal complaint questions two possible violations of the principle that any increase in the cost of public utility services must be justified by documented and warranted increases in the cost of producing those services. Specifically, in estimating its future costs, has PPL provided for:

- (1) excessive costs for the purchase of Pennsylvania coal at a higher price than the price of fully comparable coal available from out-of-state sources;
- (2) the recapture of expenditures (or for the repayment of debt incurred in prior years) for the development of unproductive nuclear power plants?

DOCKETED

FEB 17 1995

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

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

I believe it is the job of PUC to:

(1) investigate the two questions raised by my complaint;

(2) present the facts to a hearing before a judge;

(3) establish the principle that the excess cost of supporting Pennsylvania coal operators, and workers, and stockholders, should not be charged entirely to one group of Pennsylvanians - those who use PPIW electric power, - but to all Pennsylvanians via a state-wide tax

(4) establish the principle that the cost of developing unproductive nuclear power plants should not be entirely charged to one group of Pennsylvanians - those who use PPIW electric power - but to all Pennsylvanians since it was the

Commonwealth's ~~concern~~ concern for the safety and welfare of all Pennsylvanians that ended the nuclear project.

(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.

Diane McKinley

2-13-95

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

Date Signed

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

Date Served:

February 17, 1995

R-00943271C0045

PENNSYLVANIA POWER & LIGHT CO.
PAUL E. RUSSELL
GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN, PA 18101-1179

DOCUMENT
FOLDER

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

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

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

Very truly yours,

for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

February 17, 1995

DOCUMENT
FOLDER

Diane McKinley
Complainant :
 :
 v. : **Complaint Docket**
 : **No. R-00943271C0045**
 Pennsylvania Power & Light Co. :
 Respondent :

**FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY**

DOCKETED
FEB 17 1995

TO: Pennsylvania Power & Light Co.

TAKE NOTICE:

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

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

Section 1.56(a).

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

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

FAX: 610/774-6726

ORIGINAL

RECEIVED
MAR 08 1995

March 8, 1995

SECRETARY'S OFFICE
Public Utility Commission

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

Re: **Diane McKinley v.**
Pennsylvania Power & Light Company
Docket No. R-00943271C0045

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. Diane McKinley
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
MAR 08 1995

Diane McKinley

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0045

SECRETARY'S OFFICE
Public Utility Commission

DOCUMENT
FOLDER

DOCKETED
MAR 10 1995

ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY

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

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

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

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

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

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

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

By way of further answer, PP&L reviews its fuel procurement practices on an ongoing basis to ensure that those practices are appropriate and cost-effective. As demonstrated by the data and information submitted in this filing, all of

the Company's fuel costs, including the cost of coal, are reasonable, prudent and fully supported.

By way of further answer, since its commercial operation date, the Susquehanna plant has had an outstanding operating record. In every year since 1987, the plant has had an annual capacity factor greater than 70%, in every year during this period, the plant's annual capacity factor has exceeded the industry average. In three out of those seven years, Susquehanna's annual capacity factor exceeded 80%. PP&L has calculated that during the 1987-93 period, its customers realized fuel savings of approximately \$140 million as a direct result of the Company's ability to operate Susquehanna at a capacity factor above 70%.

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:



Paul E. Russell
Its Attorney

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

Dated: March 8, 1995
at Allentown, Pennsylvania

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Diane McKinley

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0045

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. Diane McKinley
190 Hill Road
Danville, Pennsylvania 17821

Dated this 8th day of March, 1995.



Paul E. Russell

ORIGINAL

MID-ATLANTIC ENERGY PROJECT

*A Project of the Pace University School of Law
Center for Environmental Legal Studies*

Sender's Address:

New York Office
Pace University School of Law
78 North Broadway, White Plains, NY 106
914/422-4227 • 914/422-4180 FAX

Pennsylvania Office
Widener Energy Law Clinic
3700 Vartan Way
Harrisburg, Pennsylvania 17110-9450
717/541-1967 • 717/541-1970 FAX

New Jersey Office
626 From Road
Paramus, New Jersey 07652
201/342-9404

February 17, 1995

John J. Alford, Secretary
PA Public Utility Commission
Room G-23, North Office Building
Harrisburg, PA 17120

RE: Pennsylvania Public Utility Commission v. Pennsylvania Power & Light Co.,
Docket No. R-00943271 **C0046**
Petition to Intervene by the Environmentalists, Docket No. R-0094327
Formal Complaint of the Environmentalists, Docket No. _____

RECEIVED
55 FEB 17 PM 3:56
F.A.P.U.C.
INFO. CONTROL DIV.

Dear Secretary Alford:

Enclosed please find for filing an original and three copies of the Environmentalists' Formal Complaint and Petition to Intervene.

We also enclose a copy for our files which we respectfully request to be time-stamped and returned in the envelope provided.

Very truly yours,

Alan J. Barak
Mid-Atlantic Energy Project
V/717-541-1967
F/717-541-1970

DOCKETED
FEB 23 1995

AJB/mlm
Enclosures

\\ppl1\corres\env\intrv.ltr

COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

FORMAL COMPLAINT
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

FORMAL COMPLAINT AND PETITION TO INTERVENE
OF SIERRA CLUB
REGARDING PP&L DOCKET R-000943271 (RATE FILING)

For Commission Use Only:

COMPLAINT DOCKET NO. _____ REF. # _____
UTILITY CODE _____

RECEIVED
FEB 17 1995
PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

PLEASE PRINT:

1. YOUR NAME, ADDRESS AND TELEPHONE NUMBER.

Name Alan J. Barak, Esq., Mid-Atlantic Energy Project (Attorney for Sierra Club)
Street 3700 Vartan Way
City Harrisburg State PA Zip 17110
County Dauphin Work Telephone-Area Code (717) 541-1967

2. COMPANY YOU ARE COMPLAINING ABOUT

Name Pennsylvania Power & Light Company

For Commission Use Only:

DATE FILED ___/___/___ MONITOR _____ BUREAU _____

3. WHAT IS YOUR COMPLAINT? (DESCRIBE PROBLEM)

BACKGROUND

1. On December 30, 1994, Pennsylvania Power & Light Company ("PP&L" or "the Company") filed Tariff Supplement No. 50 to Tariff Electric - Pa. P.U.C. No. 200, setting forth proposed changes and increases in base rates ("PP&L Rate Filing") of \$261 million, or about 11.7%.¹ The Commission assigned the matter Docket No. R-00943271.

2. On January 23, 1995, the Office of Consumer Advocate ("OCA"), Irwin A. Popowsky, Consumer Advocate, filed a Formal Complaint ("OCA Complaint") and Public Statement in the proceeding. The OCA alleged that a 500-kwh-per-month customer's bill would increase by \$9.30 per month -- from about \$44.82 to \$54.12, with the annual bill increasing from \$537.84 to \$649.44.²

3. The OCA alleges that a preliminary examination of the Company's filing indicates that the proposed charges, proposed increases and changes in rates, proposed rate schedule modifications and transfers, and proposed changes in rate policy, rules and regulations contained in the proposed Tariff are or may be unjust, unreasonable, in violation of law and will or may produce an excessive return on investment in violation of the Public Utility Code, 66 Pa. C.S.A. § 1301 *et seq.*³

4. The OCA Complaint further alleges that:

a. the Company proposes a \$2.40 increase in the monthly residential customer charge, from \$4.80 to \$7.20 per month.⁴

b. the Company's claim for a return on common equity associated with Susquehanna Nuclear Steam Electric Station Unit 2 involves a claim for physical or economic

¹ PP&L Rate Filing, Statement of Reasons at 1.

² OCA Complaint at 2 ¶ 3.C.

³ OCA Complaint at 2 ¶ 3.F.

⁴ OCA Complaint at 2 ¶ C.

excess capacity, disallowable under 66 Pa. C.S.A. § 1301, 1315, 1323⁵, insofar as the Commission has already found the facility to represent excess capacity⁶;

c. unjust, unreasonable rates may result from granting claims related to nuclear and fossil fuel decommissioning costs (of more than \$40 million per year)⁷, costs associated with social program expenditures and costs associated with environmental remediation;⁸

d. PP&L's present rates may be excessive, unjust, unreasonable and unduly discriminatory;⁹

5. The Commission has docketed Complaints against the PP&L filing as R-0043271C0001, *et seq.*

INTERESTS

6. Sierra Club is a century-old broad-based citizens' environmental organization with active members throughout the Commonwealth. It has devoted significant resources to advocating cost-effective, environmentally benign alternatives to existing supply side utility resources.

7. The Sierra Club is based in San Francisco, California and maintains a Pennsylvania Chapter with executive offices in Harrisburg, Pennsylvania. The organization's membership is located throughout the Commonwealth, and a state executive committee is broadly representative of the interests of the state's regions. Sierra Club members take service from virtually all of the state's energy utilities.

8. The Sierra Club has, since its founding in 1892, been concerned with the exploration, enjoyment, and protection of wild and scenic places of the Earth. Today's agenda includes protection of the national and global environment against threats of acid rain, water and air pollution, hazardous wastes, ozone depletion and global warming. The Sierra Club works to

⁵ OCA Complaint at 2 ¶ 3.G.

⁶ OCA Complaint, Press Release at 2.

⁷ OCA Complaint, Press Release at 2.

⁸ OCA Complaint at 2 ¶ 3.H.

⁹ OCA Complaint at 2 ¶ 3.K.

promote the utilization of renewable resources and technologies in order to preserve non-renewable natural resources for usages for which alternatives have not been identified.

9. Sierra Club will be directly affected by the Commission's orders in this matter, and, in particular, the rate and service changes which PP&L proposes through its filing.

a. Over 1,600 of Sierra Club's members are customers of PP&L and pay PP&L's rates. The Sierra Club Pennsylvania Chapter is organized into "groups" on a geographical basis. The following Groups are located in PP&L's service territory: Berks; Bucks; Governor Pinchot; Lancaster; Lehigh Valley; Moshannon; Northeast Pennsylvania; Otzinachson; Southeast Pennsylvania. The following officers and active members of Sierra Club are customers of PP&L:

- i. David Byman, Chair, Pennsylvania Chapter, of Clarks Summit;
- ii. David "Brooke" Lenker, Group Chair, Pennsylvania Chapter Governor Pinchot Group, of Harrisburg, PA.

b. Sierra Club pays rent to a commercial customer of PP&L, which rent includes utilities. Sierra Club's offices are located at 600 N. Second St. Suite 409, Harrisburg PA 17108.

c. Sierra Club's pecuniary interests will be immediately and directly affected by the rate changes which PP&L's filing proposes since PP&L seeks to increase and redesign the rates which Sierra Club and its members pay.

d. Sierra Club's interests will be immediately and directly affected by the changes which PP&L's filing proposes in rate design, the treatment of generation and T&D plant accounting and the purchase of energy and fuel in that such changes, if allowed, will be harmful to the physical environment, health and safety.

10. Sierra Club has been granted intervenor status in In Re: Joint Application of Metropolitan Edison Company, et al., Docket No. A110300F051 (DQE/Met Ed cross-state power line) (Lv. to withdraw app. allowed 1993); in Investigation Into Demand Side Management By Electric Utilities, Docket No. I-900005 (Order of December 13, 1993), as one of the "Environmentalists"; and has filed comments in Commission dockets I-860025 (all source bidding), I-900005 (seven electric utility DSM programs), and M-00940623 (IRP) as one of the Environmentalists.

11. The interests which the PP&L filing proposes to affect are substantial. If granted, PP&L's rate increase request would, on information and belief, increase residential customers' bills unjustly and unreasonably.

12. Sierra Club files this complaint in order to secure the Commission's full and fair adjudication of issues pertaining to whether PP&L's existing and proposed rates, and any and all rate policy changes, are just, reasonable, and not unduly discriminatory or otherwise unlawful.

13. In the alternative, the following persons, officers of Sierra Club, intervene and complain to represent the above-stated interests:

- a. David Byman, Pennsylvania Executive Committee Chair, of Clarks Summit, PA;
- b. David "Brooke" Lenker, Group Chair, Pennsylvania Chapter, Governor Pinchot Group, of Harrisburg, PA.

POSITIONS

Cost of service issues

14. With respect to revenues, the Commission should insure that the customers receive the benefits of emissions trading¹⁰, and that such benefits are spread to the customer classes (a) through programs that tie customer behavior to the utility's ability to market credits and (b) according to each class' contribution to the utility's ability to market such credits.

15. The Company's "fundamental restructuring"¹¹ and related transfers of tangible and intangible property may produce unnecessarily high rates because the transfers may be accomplished at less than full value. This may understate revenues and overstate expenses.

16. With respect to depreciation and decommissioning:

- a. the Company's proposed reevaluation of depreciation and decommissioning rates, while tending to increase costs associated with the production of fossil and nuclear power, may still understate the annual costs associated with such production, by, *inter alia*:

¹⁰ PP&L Rate Filing, Statement of Reasons at Book Statement B-2 acct. line item 411.8, "Gains from disposition of emission allowances \$(486,000)" [expense account item].

¹¹ PP&L Rate Filing, Statement of Reasons at 2.

- i. understating the Susquehanna decommissioning cost and rate¹²;
 - ii. understating the Susquehanna costs of waste storage and disposal¹³;
 - iii. overstating the useful lives of fossil and nuclear plants, producing a lower than reasonable depreciation rate¹⁴;
 - b. the Company's proposed revisions for transmission and distribution ("T&D") rates¹⁵, while lengthening service lives and cutting annual rates, may inaccurately state the value of the T&D systems to the customers, and thereby promote the economically inefficient consumption of energy.
17. With respect to the ECR:
- a. the Company's ECR should terminate in order to foster the most economically efficient purchases of energy resources;
 - b. Alternatively, ECR treatment of power purchases and fuel expenses should be denied unless the Company can demonstrate that it has maximized the benefits of wholesale market purchasing for its customers, and, in particular, that its purchases are the product of least cost competitive bidding or its substantial equivalent conducted at arms' length from intra-Company sources and affiliates and extra-Company sources;
 - c. the proposed treatment of the JCP&L contract termination through the ECR should be denied until and unless the Commission finds that the Company has complied with new competitive bidding regulations in dedicating the capacity and energy for its customers.
18. With respect to demand side management ("DSM") expenditures and expenditure levels the Commission should:

¹² See PP&L Rate Filing, Statement of Reasons at 10. See, e.g., PP&L Rate Filing, Statement of Reasons at Book Statement B-4, Statement of Operation and Maintenance Expenses, line 518, Nuclear fuel consumed -- leased \$58,073,000; Decontamination and decommissioning fund assessment \$2,889,000.

¹³ See, e.g., PP&L Rate Filing, Statement of Reasons at Book Statement B-4, p. 1 of 6, Statement of Operation and Maintenance Expenses, acct line 518, Spent fuel disposal \$13,248,000; p. 2 of 6, acct lines 528-32, Total Maintenance, nuclear \$60,198,000.

¹⁴ See PP&L Rate Filing, Statement of Reasons at 10.

¹⁵ See PP&L Rate Filing, Statement of Reasons at 13.

Complaint/Intervention of Sierra Club
PP&L Docket R-000943271 (Rate Filing)

- a. allow direct cost recovery for reasonable and prudent programs;
- b. allow incentives for reasonable administration of prudent programs, calculated according to the spread embedded in the pricing of PP&L's off-system sales;
- c. allow the recovery of lost revenues associated with the DSM programs, according to just and reasonable measures;
- d. require the implementation of programs to secure all cost-effective DSM, as measured by the TRC test;
- e. require the Company to use all cost-effective DSM means to reduce uncollectible accounts expenses¹⁶.

19. With respect to the proposed authorized rate of return ("ROR") on common equity, the Company's proposal overstates the ROR by undervaluing the market benefits, including reduced risk, of DSM and renewables investments, and of reliance on more environmentally benign sources of power.

Rate Design

20. With respect to rate design¹⁷ the Commission should:
- a. deny ratemaking recovery for all rate design and marketing programs that would serve to promote the consumption of electricity, including those for "expanded electric use" by high load factor customers¹⁸ and those waiving demand charges¹⁹;
 - b. provide equivalent benefits to members of other classes for the Company's proposed benefits to industrial customers for increased load factors, as with

¹⁶ See, e.g., PP&L Rate Filing, Statement of Reasons at Book Statement B-4, p. 5 of 6, Statement of Operation and Maintenance Expenses, acct line 904, Customer Accounts Expenses, Uncollectible accounts \$16,932,000.

¹⁷ See PP&L Rate Filing, Statement of Reasons at 7-8.

¹⁸ PP&L Rate Filing, Statement of Reasons at 14.

¹⁹ PP&L Rate Filing, Statement of Reasons at 14-15.

credits and discounts for residential and commercial measures taken to cut peak usage;

- c. require as a precondition to eligibility for any promotional or discount rate, including "economic development rates", that a business customer be initially and periodically certified through an approved independent auditor that it has undertaken to cost-effectively maximize the energy efficiency of its operations, as measured for the period that the rate is expected to be in effect for it, OR that it has in place an approved plan for such cost-effective measures;
- d. require the Company's rate design to fully reflect each class' contribution to the need for investment in baseload facilities, including the contribution of high load factor customers to the need for construction and operation of expensive nuclear plants and environmental control facilities²⁰ at large coal-fired plants;
- e. deny the proposed reduction of credits for demonstrably interruptible load²¹, and establish a penalty for the Company's failure to reasonably and prudently utilize contracted service interruptions as a resource when system conditions warrant interruptions.

21. The Commission should require the Company to enhance the choices available to its customers by providing and marketing green pricing tariffs that will permit customers of each of the classes to subscribe to a tariff calculated to support the net costs of the Company's purchasing or otherwise providing energy services from environmentally benign sources, exclusive of customer premises equipment or measures.

22. Sierra Club reserves the right to identify and raise other issues relating to PP&L's rates, services and charges as the facts become more fully apparent as this case proceeds through the discovery and evidentiary phases.

4. WHAT DO YOU WANT US TO DO?

WHEREFORE, SIERRA CLUB REQUESTS THAT THE COMMISSION:

- a. Receive for filing and docket this Formal Complaint and Intervention;

²⁰ See PP&L Rate Filing, Statement of Reasons at 8.

²¹ PP&L Rate Filing, Statement of Reasons at 14.

Complaint/Intervention of Sierra Club
PP&L Docket R-000943271 (Rate Filing)

- b. Consolidate this Formal Complaint and Intervention with all Applications, Complaints, Protests and Interventions filed with respect to proposed Supplement No. 50, including the above-captioned matters;
- c. Order that Sierra Club be a party to such proceedings, that it be placed on the service list, and that each party to the proceeding provide it with all papers filed therein;
- d. Suspend and investigate the operation of proposed Supplement No. 50, pursuant to Section 1308(d) of the Public Utility Code, 66 Pa. C.S.A. § 1308(d);
- e. Hold full evidentiary contested case hearings examining the reasonableness of PP&L's current rates and its proposed increases in rates, including any and all proposed modifications to rates and rate policy;
- f. After providing the public with adequate notice, and AFTER THE COMPLETION OF THE FORMAL PARTIES' EVIDENTIARY HEARINGS herein, so that the issues before the public may be properly developed and focused, hold public input hearings throughout PP&L's service territory in order to provide its customers with an opportunity to be heard on the record, and make the testimony and exhibits received therein a part of the record;
- g. Deny any increase or change in PP&L's rates that is unjust, unreasonable, unduly discriminatory or inconsistent with the Public Utility Code, sound ratemaking principles, and public policy;
- h. Determine the justness and reasonableness of Respondent's current and proposed rates;
- i. Grant the relief requested in this Formal Complaint and Intervention;
- j. Grant all other relief to which Sierra Club is entitled; and
- k. Grant such other relief which the Commission may deem to be necessary and proper.

YOU MUST SIGN AND DATE YOUR COMPLAINT.

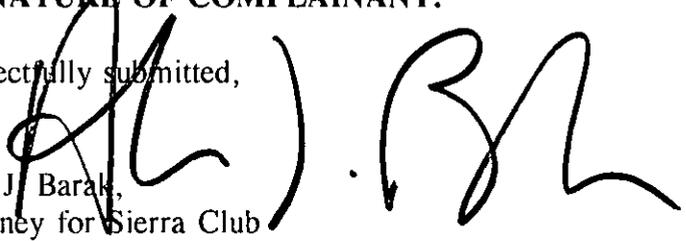
The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State law if I purposely give false information.

Complaint/Intervention of Sierra Club
PP&L Docket R-000943271 (Rate Filing)

SIGNATURE OF COMPLAINANT:

Respectfully submitted,

Alan J. Barak,
Attorney for Sierra Club



Alan J. Barak (Sup. Ct. No. 67886)

Mid-Atlantic Energy Project
Widener University Energy Law Clinic
3700 Vartan Way
Harrisburg PA 17110

717/541-1967 voice
717/541-1970 fax

Daniel W. Rosenblum, Director, Of Counsel²²

Dated: February 17, 1995

YOU DO NOT NEED A LAWYER If you **DO** have a lawyer **PLEASE PRINT** the lawyer's name, address and telephone number below.

Lawyer's Name Alan J. Barak, Esq.

Street 3700 Vartan Way
City Harrisburg State PA Zip 17110
Telephone Number-Area Code (717) 541- 1967

\\pp1\comp101.pld

²² Member Illinois and New York bars.

CERTIFICATE OF SERVICE

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

I hereby certify that I have this, the 17th day of February 1995, served a true copy of the foregoing document, Formal Complaint and Petition to Intervene by the Sierra Club, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

SERVICE IN PERSON:

John J. Alford, Secretary
PA Public Utility Commission
Room G-23, North Office Building
Harrisburg, PA 17120

ALJ Michael C. Schnierle
PA Public Utility Commission
Room G-05, North Office Building
Harrisburg, PA 17120

SERVICE BY FIRST CLASS MAIL:

Johnnie E. Simms, Esq.
Stephen Gorka, Esq.
Kenneth L. Mickens, Esq.
PA Public Utility Comm.
901 North 7th St. 3rd Fl.
Harrisburg, PA 17101

David M. Kleppinger, Esq.
James P. Dougherty, Esq.
Derrick P. Williamson, Esq.
McNees Wallace & Nurick
P.O. Box 1166
Harrisburg, PA 17108-1166

Gary M. Bootay
Kimberley Meadows
6 Manor Drive
Mechanicsburg, PA 17055

D. Jane Drennan, Esq.
1216 16th St. NW
Washington, DC 20036

Vickie Mackin
c/o Concerned Citizens of Schuylkill
County Inc.
P.O. Box 37
McAdoo, PA 18237

Joan O. Brandeis, Esq.
Schnader, Harrison Segal & Lewis
Suite 3600
1600 Market Street
Philadelphia, PA 19103-4252

Karen Oill Moury, Esq.
Office of Small Business Advocate
Suite 1102 - Commerce Building
300 North Second Street
Harrisburg, PA 17101

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

Jack A. Baker
119 West Coover Street
Mechanicsburg, PA 17055

Elaine Scheidler
1130 Loop Drive
Harrisburg, PA 17112-2151

Harold C. Landes
2680 North Old Bethlehem Pike
Quakertown, PA 18951

Laura N. Haser
234 West Walnut St.
Lancaster, PA 17603

Hon. Lisa M. Boscola
House of Representatives
Main Capitol, House Box 202020
Harrisburg, PA 17120-2020

Wallace R. & Doris M. Fenner
P.O. Box 57
Breinigsville, PA 18031

Samuel P. Kalny
1106 West Livingston St.
Whitehall, PA 18052-6920

Michael P. McClain
RD 1, Box 1299
Moscow, PA 18444

Hon. Joseph M. Uliana
Senate of Pennsylvania
Senate Post Office
Main Capitol
Harrisburg, PA 17120

Linda M. Fetter
1335 South 9th Street
Allentown, PA 18103

David A. McCormick, Esq.
Regulatory Law Office
Office of the Judge Advocate General
Dept. of the Army
901 North Stuart Street - Room 713
Arlington, VA 22203-1837

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

Ethel Richardson
RD 3, Box 1383
Mifflintown, PA 17059

Hon. Sheila Miller
House of Representatives
Main Capitol
Harrisburg, PA 17120

Joel Guittard
RD 4, Box 349E
Lake Ariel, PA 18436

Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Ave.
Cambridge, MA 02140

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

Thomas P. Gadsden, Esq.
Anthony C. DeCusatis, Esq.
David B. MacGregor, Esq.
Morgan Lewis & Bockius
2000 One Logan Square
Philadelphia, PA 19103

Tanya J. McCloskey, Esq.
Mary C. Kenney, Esq.
Assistant Consumer Advocates
Office of the Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120



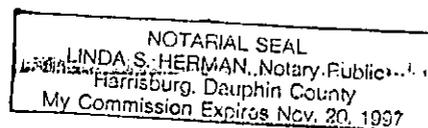
Mary Lou Morin
(for) Mid-Atlantic Energy Project
Widener University Energy Law Clinic
3700 Vartan Way
Harrisburg, PA 17110
V/717-541-1967
F/717-541-1970



Notary Public

2-17-95

(Date)





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

IN REPLY PLEASE
REFER TO OUR FILE

February 23, 1995

R-943271C0046

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

DOCUMENT
FOLDER

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

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

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

Very truly yours,

lpw
Attachment

for: John G. Alford, Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
February 23, 1995

DOCUMENT
FOLDER

SIERRA CLUB

Complaint Docket
No. R-943271C0046

v.

PENNSYLVANIA POWER & LIGHT

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
FEB 23 1995

TO: PENNSYLVANIA POWER & LIGHT

TAKE NOTICE:

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

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

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

KJR

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

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

ORIGINAL

FAX: 610/774-6726

March 14, 1995

RECEIVED
MAR 14 1995

SECRETARY'S OFFICE
Public Utility Commission

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

Re: **Sierra Club v.**
Pennsylvania Power & Light Company
Docket No. R-00943271C0046

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: Alan J. Barak, Esquire
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Sierra Club

v.

Complaint Docket
No. R-00943271C0046

Pennsylvania Power & Light
Company

DOCKETED
MAR 16 1995

ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY

DOCUMENT
FOLDER

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

1. Admitted.
2. Admitted.
3. Admitted in part, denied in part for the reasons set forth in

response to subparagraphs 1 through 22, below.

Background

1. Admitted.
2. Admitted. By way of further answer, the impact on individual customers will vary, 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 data cited in the Office of Consumer Advocate (OCA) Complaint is representative only for a residential customer using 500 KWH of electricity per month.

3. Admitted in part, denied in part. It is admitted that the OCA made the allegations cited in this paragraph. It is denied that PP&L's proposed rates are "unjust, unreasonable, in violation of law and will or may produce an excessive return on investment in violation of the Public Utility Code, 66 Pa. C.S.A. § 1301 et seq." 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. 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.

4. Admitted in part, denied in part for the reasons set forth in response to subparts a through d, below.

a. Admitted

b. Admitted in part, denied in part. It is admitted that the OCA made the allegations cited in this paragraph. All other allegations are denied. As shown by the supporting information in the filing, all of PP&L's facilities, including the Susquehanna Steam Electric Station Unit 2, are used and useful in providing utility service to PP&L's customers. None of the Company's facilities constitute physical and/or economic excess capacity; none of the costs of those facilities can be disallowed under the Public Utility Code.

c. Admitted in part, denied in part. It is admitted that the OCA made the allegations cited in this paragraph. All other allegations are denied. As shown by the supporting information of the filing, all of PP&L's claims are fully justified and the requested rates are just and reasonable. See PP&L's answer to subparagraph 3, above.

d. Admitted in part, denied in part. It is admitted that the OCA made the allegations cited in this paragraph. All other allegations are denied. 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.

5. Admitted.

Interests

6. Denied. PP&L is without knowledge or information sufficient to respond to Complainant's statements regarding the nature of the Sierra Club, its membership or its activities. These allegations therefore are denied. PP&L demands proof of these allegations at any hearings held on the Complaint.

7. Denied. See PP&L's answer to subparagraph 6, above.

8. Denied. See PP&L's answer to subparagraph 6, above.

9. Denied. See PP&L's answer to subparagraph 6, above.

a. Admitted in part, denied in part. It is admitted that the individuals cited in this paragraph are customers of PP&L. All other allegations are denied. See PP&L's answer to subparagraph 6 above.

b. Denied. See PP&L's answer to subparagraph 6, above.

c. Admitted in part, denied in part. It is admitted that PP&L is proposing to increase and redesign its rates. PP&L does not have knowledge or information sufficient to respond to statements regarding the impact upon Complainant.

d. Denied. The Company's proposals in this rate filing will not be harmful to the physical environment, health and safety. PP&L is committed to operating its system in a safe and environmentally responsible manner.

10. Admitted.

11. Denied. See PP&L's answer to subparagraph 3, above.

12. Denied. See PP&L's answer to subparagraphs 3 and 6, above.

13. Denied. See PP&L's answer to subparagraph 6, above.

Positions

14-22. Denied. These paragraphs constitute argument and, as such, do not require answers.

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

RECEIVED
95 FEB 22 AM 9:06
PA. P. U. C.
INFO. CONTROL DIV.

Please Print: R-943271 C0047

1. Your Name, Mailing Address and Telephone Number

Name Theodore Hartley
Street/P.O. Box RD1 Box 99 Apt# _____
City Turbotville State Pa. Zip 17772
County Montour Home Telephone-Area Code (717) 437-2802
Work Telephone-Area Code (717) 524-8200

2. Which company does your complaint concern?

Name of Company P.P. & L.

DOCUMENT
FOLDER

3. What is your complaint?

My complaint is about your proposed rate increase. Have you
realised that if your increase goes through that it will effect
mostly the middle class people which is almost all of your customers.
20% is a lot of money when you are on a budget and can only put
maybe (if you are lucky) 10.00 a wk into your savings. You have to
understand that the average person only makes between 5.00 to 10.00
an hour and only gets a raise every once in a great while sometimes not at
all. Every thing is going up in price in this country except the wages
of the people that support it.

DOCKETED
FEB 23 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?

I want you to consider the people that pay the most is the people that get the less. I wish I could get a 20% raise. I don't think it is very far when you can raise the prices and then turn the power off when we need it the most (ie. Winter of 1993-1994)

(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.

Theodore A. [Signature]

2/17/95

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

Date Signed

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____



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

DOCUMENT
FOLDER
IN REPLY PLEASE
REFER TO OUR FILE

February 23, 1995

R-943271C0047

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

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

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

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

Very truly yours,

lpw
Attachment

for: John G. Alford, Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
February 23, 1995

DOCUMENT
FOLDER

THEODORE HARTLEY

Complaint Docket
No. R-943271C0047

v.

PENNSYLVANIA POWER & LIGHT

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
FEB 23 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 RECEIVED
MAR 14 1995

March 14, 1995

**SECRETARY'S OFFICE
Public Utility Commission**

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

Re: **Theodore Hartley v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0047**

**DOCUMENT
FOLDER**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Theodore Hartley
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Theodore Hartley

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0047

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

Theodore Hartley
R.D. 1, Box 99
Turbotville, Pennsylvania 17772

Dated this 14th day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Theodore Hartley

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0047

DOCKETED
MAR 16 1995

ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY

**DOCUMENT
FOLDER**

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

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

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

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

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

Paul E. Russell
Its Attorney

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

Dated: March 14, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

DOCUMENT
FOLDER

RECEIVED
95 FEB 22 AM 9:05
U.C.
INFO. CONTROL DIV.

Please Print:

R-943271 C0048

1. Your Name, Mailing Address and Telephone Number

Name Mr + Mrs L.G. Kessinger
Street/P.O. Box 246 E Main St. Apt#
City Shiremanstown State Pa Zip 17011
County Cumberland Home Telephone-Area Code (717) 761-6166
Work Telephone-Area Code ()

2. Which company does your complaint concern?

Name of Company Pennsylvania Power + Light Co

3. What is your complaint?

My complaint is about PP+L's filing a
request to increase the electric rate. We
recently moved from a southern state that
does not have as much Hydro Power as Pa.
the residential lines seem to be more
updated and that state had many more
severe storms. With that their rates were
much lower than PP+L's.

If the rate request is approved the
residential increase would be 20.7%
compared to 2.4% and 9.1% for commercial
and industrial.

DOCKETED

(If you need more space use additional paper and attach to this form). FEB 23 1995

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

I want PUC to refuse the rate increase request. If an increase should be approved review and adjust how the rate increase would affect PP&L's customers.

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

5. You must sign and date your complaint.

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

Mr. J. King
Mrs. L.G. Kessinger

2-15-95
2-15-95

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

Date Signed

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____



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

DOCUMENT
FOLDER
IN REPLY PLEASE
REFER TO OUR FILE

February 23, 1995

R-943271C0048

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

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

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

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

Very truly yours,

lpw
Attachment

for: John G. Alford, Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
February 23, 1995

DOCUMENT
FOLDER

MR & MRS L G KESSINGER

Complaint Docket
No. R-943271C0048

v.

PENNSYLVANIA POWER & LIGHT

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
FEB 23 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

March 14, 1995

RECEIVED
MAR 14 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: **Mr. & Mrs. L. G. Kessinger v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0048**

**DOCUMENT
FOLDER**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. & Mrs. L. G. Kessinger
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mr. & Mrs. L. G. Kessinger

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0048

CERTIFICATION OF SERVICE

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

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

Mr. & Mrs. L. G. Kessinger
246 E. Main Street
Shiremanstown, Pennsylvania 17011

Dated this 14th day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mr. & Mrs. L. G. Kessinger

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0048

DOCKETED
MAR 16 1995

**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. Denied. PP&L does not have knowledge or information to respond to Complainants' statements regarding their experience with other electric utilities.

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

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:



Paul E. Russell
Its Attorney

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

Dated: March 14, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

RECEIVED
95 FEB 22 AM 9:05
INFO. CONTROL DIV.

Please Print:

ORIGINAL
R-9432710049

1. Your Name, Mailing Address and Telephone Number

Name Raymond R. Mann sr
Street/P.O. Box 832 Canal Drive Apt# _____
City Pine Grove State Penna Zip _____
County Schuylkill Home Telephone-Area Code (717) 345-2648
Work Telephone-Area Code (-) Retired

2. Which company does your complaint concern?

Name of Company PP&L Electric Co.

DOCUMENT FOLDER

3. What is your complaint?

MY Electric Bill IS high enough. Being on a
Fixed income, I cannot afford To Pay Anymore.

DOCKETED
FEB 22 1995

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

(-over-)

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

To say NO To Their Rate HIKE.

(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.

Raymond A. Wann Sr.

2/17/95

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 DOCUMENT
PENNSYLVANIA PUBLIC UTILITY COMMISSION FOLDER
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

February 23, 1995

R-943271C0049

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

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

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

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

Very truly yours,

lpw
Attachment

for: John G. Alford, Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
February 23, 1995

DOCUMENT
FOLDER

RAYMOND R MANN SR

Complaint Docket
No. R-943271C0049

v.

PENNSYLVANIA POWER & LIGHT

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
FEB 23 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

ORIGINAL

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

FAX: 610/774-6726

March 14, 1995

RECEIVED
MAR 14 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: Raymond R. Mann, Sr. v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0049**

**DOCUMENT
FOLDER**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Raymond R. Mann, Sr.
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Raymond R. Mann, Sr.

v.

Pennsylvania Power & Light
Company

:
:
: Complaint Docket
: No. R-00943271C0049
:
:
:

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

Raymond R. Mann, Sr.
832 Canal Drive
Pine Grove, Pennsylvania

Dated this 14th day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Raymond R. Mann, Sr.

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0049

DOCKETED
MAR 16 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

**DOCUMENT
FOLDER**

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

1. Admitted.
2. Admitted.
3. Denied. PP&L does not have knowledge or information sufficient to respond to Complainant's statements regarding his personal finances.

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

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:



Paul E. Russell
Its Attorney

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

Dated: March 14, 1995
at Allentown, Pennsylvania

ORIGINAL

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

RECEIVED

KJR

95 FEB 22 AM 9:02

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

Please Print:

R-943271 C0050

1. Your Name, Mailing Address and Telephone Number

Name Mrs Regina Weaver et al

Street/P.O. Box 225 W. Diamond St. Apt#

City Souderton State Pa Zip 18964

County Montg. Home Telephone-Area Code (215) 723-9515

Work Telephone-Area Code (215) 256-9501

2. Which company does your complaint concern?

Name of Company P.P.+I Electric Comp.

3. What is your complaint?

I am against ~~PP&I~~ raising the rates by 20%. this is too high a raise for private electric users, & for industries & will affect the economy in all these areas using P.P.+I. electric. We have electric heat in our home & were told when we bought our home it would be more cost effective, as they would always give us reduced kilowatt rates. that has been changed over the years and our cost of heat would be more than we could possibly afford if they are allowed such a raise in rates.

DOCUMENT
FOLDER

DOCKETED
DOCKETED

FEB 23 1995

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

(-over-)

39

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

Do not grant them the increase in rates they are demanding

(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.

Regina F. Weaver, R.N.

2/20/95

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

Date Signed

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

23
223
65

RECEIVED

95 FEB 22 AM 9:02

① C. RICHARD WEAVER

225 W DIAMOND

SOUDERTON, PA 18964

C. Richard Weaver (215-723-9515)

PA S. C.
DO. CONTROL DIV.

② SUZANNE MacFadden

JAMES MACFADDEN

375 Cowpath Rd.

Souderton, PA. 18964

Suzanne Macfadden (215) 723-4453

James Macfadden (215) 723-4455

③ Susan L. Unzicker

Royal D. Unzicker

1526 Diamond St.

Sellersville, PA 18960

Susan L. Unzicker

Royal D. Unzicker

(215) 453-1059

④ PAULA E. HERBEIN

RICHARD J. HERBEIN

(215) 723-9377

736 SPRINGSHIRE DR.

TELFORD, PA 18969

Paula E. Herbein

Richard J. Herbein



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

DOCUMENT
FOLDER
IN REPLY PLEASE
REFER TO OUR FILE

February 23, 1995

R-943271C0050

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

A Complaint has been filed against you before the Pennsylvania Public Utility Commission by REGINA F WEAVER, 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

Very truly yours,

lpw
Attachment

for: John G. Alford, Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
February 23, 1995

DOCUMENT
FOLDER

REGINA F WEAVER, ET AL

Complaint Docket
No. R-943271C0050

v.

PENNSYLVANIA POWER & LIGHT

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
FEB 23 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.

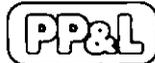
4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate 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
RECEIVED**
MAR 14 1995

March 14, 1995

SECRETARY'S OFFICE
Public Utility Commission

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

Re: **Regina F. Weaver, et al. v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0050

**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: Mrs. Regina F. Weaver
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mrs. Regina F. Weaver, et al.

v.

Pennsylvania Power & Light
Company

:
:
: Complaint Docket
: No. R-00943271C0050
:
:
:

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

Mrs. Regina F. Weaver
225 W. Diamond Street
Souderton, Pennsylvania 18964

Dated this 14th day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Regina F. Weaver, et al.

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0050

DOCUMENT
FOLDER

DOCKETED
MAR 16 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. Admitted in part, and denied in part. It is admitted that from 1961 through January 30, 1981, PP&L offered a special rate, designated Rate RH, to qualifying all-electric homes. All other allegations are denied.

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

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

PP&L does not have sufficient knowledge to respond to Complainant's statements regarding her personal experience with her all-electric home.

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 not tracked the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

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

Paul E. Russell
Its Attorney

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

Dated: March 14, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

ORIGINAL

RECEIVED
95 FEB 21 AM 10:52
KJR
PA. P.U.C. DIV.
INFO. CONTROL

Please Print:

R. 9432710051

1. Your Name, Mailing Address and Telephone Number

Name CHARLES & FRANCINE BORY
Street/P.O. Box P.O. Box 134 ~~11111~~ COLONY COVE SOUTH
City TAFTON State PA Zip 18464
County PIKE Home Telephone-Area Code (712) 226-9845
Work Telephone-Area Code ()

2. Which company does your complaint concern?

Name of Company PP&L

3. What is your complaint?

BENEFIT SENIOR CITIZENS LIVING ON S.S. AND LOOKING
AT A 20.7 PERCENT INCREASE, WILL BE ANOTHER
COST INCREASE, WHICH WILL ADDED TO THE BURDEN
BEING CONSIDERED IN WASHINGTON, D.C.
THERE ARE ENOUGH PEOPLE WHO CAN HARDLY
PAY THEIR BILLS NOW.
THIS HAS TO BE THE AGE OF HARDSHIP, FOR
THE ELDERLY. AT LEAST CONSIDER A LOWER RATE,
IF ITS ABSOLUTELY NECESSARY, FOR US OLDER
FOLKS.
AS IT IS NOW, WE PAY AN EXTRA \$2.00/MTH TO
HELP THOSE WHO NEED HELP TO PAY THEIR BILLS.
GOOD LUCK TO YOU - MAY GOD GUIDE YOU.

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

DOCUMENT
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(-over-)

FEB 23 1995

107

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

WE THINK THAT THE PUC SHOULD CONSIDER THE SENIOR CITIZENS because, so many of us live on the FIXED INCOME of Social Security, which by ANY stretch of the IMAGINATION is NOT secure.

This is just another lets get more cash, but unless its ABSOLUTELY needed, Please, look into the why is it needed. You people ARE INTELLIGENT folks, and we ~~are~~ are sure your sence of Good Judgement will Tell you what you have to do.

IN ADDITION, there are many Younger people who ARE STRUGGLING to Make ENDS Meet, Due to the lack of Job + Industry here.
(If you need more space use additional paper and attach to this form).

5. You must sign and date your complaint.

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

Charles J. Boy & Francine Boye

2/16/95

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____

State _____

Zip _____

Telephone Number-Area Code () _____

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PO BOX 3265, HARRISBURG, PA 17105-3265
February 24, 1995

KJR

R-943271C0051

PAUL E RUSSELL, ESQUIRE
PENNSYLVANIA POWER & LIGHT CO
TWO NORTH NINTH STREET
ALLENTOWN PA 18010-1179

Dear Sir:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

DOCUMENT
FOLDER

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

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

Very truly yours,

for John G. Alford, Secretary

fao
Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
February 24, 1995

CHARLES & FRANCINE BORY

Complaint Docket
No. R-943271C0051

v.

PENNSYLVANIA POWER & LIGHT CO.

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: PENNSYLVANIA POWER & LIGHT CO.

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 PA 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).

DOCUMENT
FOLDER

DOCKETED
FEB 24 1995

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

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

FAX: 610/774-6726

ORIGINAL

March 14, 1995

RECEIVED
MAR 14 1995

SECRETARY'S OFFICE
Public Utility Commission

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

Re: **Charles & Francine Bory v.**
Pennsylvania Power & Light Company
Docket No. R-00943271C0051

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: Charles & Francine Bory
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Charles & Francine Bory

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0051

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

Charles & Francine Bory
P. O. Box 134
Colony Cove South
Tafton, Pennsylvania 18464

Dated this 14th day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Charles & Francine Bory

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0051

DOCKETED
MAR 16 1995

ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY

**DOCUMENT
FOLDER**

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

1. Admitted.
2. Admitted.
3. Denied. PP&L does not have knowledge or information sufficient to respond to Complainants' statements regarding their 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.

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

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

Paul E. Russell
Its Attorney

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

Dated: March 14, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

ORIGINAL

RECEIVED
95 FEB 21 AM 10:53
PA. P. U. C.
INFO. CONTROL

R-943271C0052

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name KAY F. COOPER
Street/P.O. Box R.D. # 2 Box 662 Apt# Cooper Rd.
City SCHUYLKILL HAVEN State Pa. Zip 17972
County SCHUYLKILL Home Telephone-Area Code (717) 345-3384
Work Telephone-Area Code ()

2. Which company does your complaint concern?

Name of Company Pa. Power and Light Co. 2 N. 9th St. Allentown Pa.
18101

3. What is your complaint?

I see no reason in the increase which hasn't happened yet but they want to the electric. How is the poor person supposed to live? I'm unable to work osteoarthritis in both knees unable to collect SSI they told me. I would rather burn wood, coal to keep warm & use candles for light. Its outrageous increasing the electricity then everyone could get their checks raised. The man with money doesn't know what it is to be poor. Everyone should turn to the almighty and we will leave the earth just as we came with nothing. I feel the electric bill SHOULD NOT GO UP.

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

DOCKETED

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PO BOX 3265, HARRISBURG, PA 17105-3265
February 24, 1995

KJR

R-943271C0052

PAUL E RUSSELL, ESQUIRE
PENNSYLVANIA POWER & LIGHT CO
TWO NORTH NINTH STREET
ALLENTOWN PA 18010-1179

Dear Sir:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

DOCUMENT
FOLDER

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

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

Very truly yours,

for John G. Alford, Secretary

fao
Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
February 24, 1995

KAY F. COOPER

Complaint Docket
No. R-943271C0052

v.

PENNSYLVANIA POWER & LIGHT CO.

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: PENNSYLVANIA POWER & LIGHT CO.

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 PA 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).

DOCUMENT
FOLDER

DOCKETED
FEB 24 1995

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



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

**DOCUMENT
FOLDER**

March 14, 1995

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

RECEIVED
MAR 14 1995

**SECRETARY'S OFFICE
Public Utility Commission**

Re: **Kay F. Cooper v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0052**

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. Kay F. Cooper
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Kay F. Cooper

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0052

DOCUMENT
FOLDER

DOCKETED
MAR 16 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 knowledge or information 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.

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

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

Paul E. Russell
Its Attorney

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

Dated: March 14, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

RECEIVED
95 FEB 21 AM 10:53
PA. P.U.C. DIV.
INFO. CONTROL

ORIGINAL

R-9432710053

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name Paul T. SADOWNIK + Doris J.

Street/P.O. Box HC1 Box 2480 Apt#

City TAFTON State PA Zip 18464

County PIKE Home Telephone-Area Code (717) 226-8475

Work Telephone-Area Code (717) 226-8475

2. Which company does your complaint concern?

Name of Company Penn Power + Light (Allentown)

3. What is your complaint?

PP+L's Excessive 20%+ increase for
Residential Electric usage.

DOCKETED

FEB 23 1995

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

(-over-)

100
d 93

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

I want the PUC to deny PP+L's rate
increase on Residential Customers

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

5. You must sign and date your complaint.

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

Louis J. Sadownik
Signature of complaining person, or officer

9-15-95
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 () _____

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

PA. P. U. C.
INSTR. CONTROL DIV.

95 FEB 21 AM 9:54

RECEIVED

R-9432710005

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name PAUL T. SAROWNIK

Street/P.O. Box HCI Box 2480 Apt#

City Tatton State Pa Zip 18464

County Pike Home Telephone-Area Code (717) 226-8475

Work Telephone-Area Code ()

2. Which company does your complaint concern?

Name of Company Penn P&L Callentown

3. What is your complaint?

REQUEST by PP+L for 20.7% increase
of Residential Electric Rates

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

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

Deny PPL 20% + Electric rate increase on Home owners

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

5. You must sign and date your complaint:

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

Paul J. Fadown

2/15/95

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PO BOX 3265, HARRISBURG, PA 17105-3265
February 24, 1995

R-943271C0053

PAUL E RUSSELL, ESQUIRE
PENNSYLVANIA POWER & LIGHT CO
TWO NORTH NINTH STREET
ALLENTOWN PA 18010-1179

Dear Sir:

A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **PAUL T. SADOWNIK & DORIS J.** . 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

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

DOCUMENT
FOLDER

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

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

Very truly yours,

for John G. Alford, Secretary

fao
Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
February 24, 1995

PAUL T. SADOWNIK & DORIS J.

Complaint Docket
No. R-943271C0053

v.

PENNSYLVANIA POWER & LIGHT CO.

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: PENNSYLVANIA POWER & LIGHT CO.

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 PA 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).

DOCUMENT
FOLDER

DOCKETED
FEB 24 1995

2. If you fail to either satisfy this complaint or to file an answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 53 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

March 14, 1995

RECEIVED
MAR 14 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: **Paul T. & Doris J. Sadownik v.**
Pennsylvania Power & Light Company
Docket No. R-00943271C0053

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: Paul T. & Doris J. Sadownik
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Paul T. & Doris J. Sadownik

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0053

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

Paul T. and Doris J. Sadownik
HC 1, Box 2480
Tafton, Pennsylvania 18464

Dated this 14th day of March, 1995.



Paul E. Russell

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

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

Paul E. Russell
Its Attorney

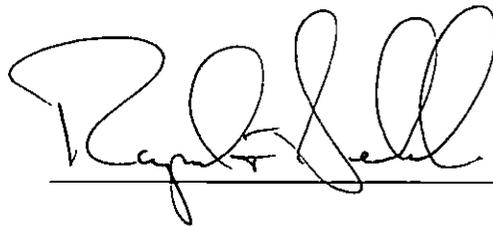
Of Counsel:
David B. MacGregor, Esquire
Morgan, Lewis & Bockius
2000 One Logan Square
Philadelphia, Pennsylvania 19103

Dated: March 14, 1995
at Allentown, Pennsylvania

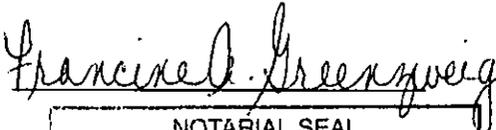
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
: SS
COUNTY OF LEHIGH)

RAYMOND F. SUHOCKI, being duly sworn according to law, deposes and says that he is Vice President-Marketing & Economic Development of Pennsylvania Power & Light Company; that he is authorized to and does make this affidavit for it; and that the facts set forth above are true and correct to the best of his knowledge, information and belief and he expects the said Pennsylvania Power & Light Company to be able to prove the same at any hearing hereof.



Sworn to and subscribed
before me this 13th day
of March, 1995.



NOTARIAL SEAL
FRANCINEA. GREENZWEIG, Notary Public
City of Allentown, Lehigh County, PA
My Commission Expires Oct. 29, 1998

ORIGINAL

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

RECEIVED
95 FEB 21 AM 10:53
PA. P.U. CONTROL DIV.

Please Print:

R-9432710005#

1. Your Name, Mailing Address and Telephone Number

Name Ron Stepanchick
Street/P.O. Box 332 HARVEST DRIVE Apt#
City LITITZ State PA. Zip 17543
County Lancaster Home Telephone-Area Code (717) 6274507
Work Telephone-Area Code (717) 2993714 Ext. 3216

2. Which company does your complaint concern?

Name of Company PPL

3. What is your complaint?

- Un Fair proposed 20% price increase and unfair
distribution of burden on various group of customers.
- SERVICE POOR - I live in area of East Petersburg sub station -
our power has gone off 3 or 4 times in the past
several months due to a malfunctioning breaker -
This past incident occurred Feb. 15 from 6:30 - 8:30 - It
closed down K-mart on Fruitville Pike, Pedners and 1750+
customers. - We have received a letter apologizing and telephone
calls apologizing - their timing is bad to be asking for
a 20% increase!

DOCUMENT DOCKETED
FOLDER FEB 28 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?

VOICE MY CONCERN AND
- FIGHT FOR A REDUCED % increase - more fair 8% spread evenly
- Redistribute % in a more fair manner - Now as I understand
the proposed +20% - on home owner; business +1.7% + commercial
much less than home owner. Should be least on home owners!
- PPL using typical home owner using 500 kilowatts/month. -
This is unrealistic. - I'm average - 4 people in family using 3300 Avg.
kilowatts month. My bills would jump alot more than examples they provide.
- Basing part of increase on clean up of atomic Reactors - Not PPL
customers problem - we never asked for atomic - Should be part of
Risk of doing business. - As consumers of PPL Electricity we do not
have option of alternate source of electricity and should not be
forced into paying for a monopolys bad judgement for atomic fired
power.

(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.

For Stapanovich

2.1.1995

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

Date Signed

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

Lawyer's Name N/A.

Street _____

City _____ **State** _____ **Zip** _____

Telephone Number-Area Code () _____

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

ORIGINAL

Please Print:

R94327100055

RECEIVED
95 FEB 21 AM 11:11
INFO. CONTROL DIV.

1. Your Name, Mailing Address and Telephone Number

Name CHARLES E. ESTERBROOK

Street/P.O. Box 45 PARK ST Apt#

City AKRON State OH Zip 44301

County LANC. Home Telephone-Area Code (717) 859-3826

Work Telephone-Area Code ()

2. Which company does your complaint concern?

Name of Company PP&L

3. What is your complaint?

THIS IS THE 3RD YEAR IN A ROW THAT
THE PP&L IS REQUESTING AN INCREASE.
MY BILLS NOW CONSIST OF THE FOLLOWING
CHARGES OVER & ABOVE ELECTRIC USAGE RATE!
* CUSTOMER CHARGE
* SURCHARGE FOR PA. TAXES } TOTALING \$25.00
* ENERGY CHARGE
* SPEC BASE RATE

* THESE CHARGES SHOULD BE ILLEGAL !!
IN SHORT - ENOUGH IS ENOUGH

DOCUMENT
FOLDER

DOCKETED
FEB 20 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.

DENY ANOTHER AUTOMATIC 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.

Charles E. Esterbrook

2/16/95

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

Date Signed

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PO BOX 3265, HARRISBURG, PA 17105-3265
February 24, 1995

R-943271C0054

PAUL E RUSSELL, ESQUIRE
PENNSYLVANIA POWER & LIGHT CO.
TWO NORTH NINTH STREET
ALLENTOWN PA 18010-1179

Dear Sir:

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

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DOCUMENT
FOLDER

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

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

Very truly yours,

for John G. Alford, Secretary

fao
Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
February 24, 1995

RON STEPANCHICK

Complaint Docket
No. R-943271C0054

v.

PENNSYLVANIA POWER & LIGHT CO.

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: PENNSYLVANIA POWER & LIGHT CO.

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 PA 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).

DOCUMENT
FOLDER

DOCKETED

FEB 24 1995

2. If you fail to either satisfy this complaint or to file an answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 53 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

March 14, 1995

RECEIVED
MAR 14 1995

SECRETARY'S OFFICE
Public Utility Commission

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

Re: **Ron Stepanchick v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0054

**DOCUMENT
FOLDER**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Ron Stepanchick
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Ron Stepanchick

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0054

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

Ron Stepanchick
332 Harvest Drive
Lititz, Pennsylvania 17543

Dated this 14th day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Ron Stepanchick

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0054

DOCKETED
MAR 16 1995

ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY

**DOCUMENT
FOLDER**

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

1. Admitted.
2. Admitted.
3. Denied. PP&L has addressed the service concerns cited in the

Complaint; the Company remains committed to furnishing and maintaining adequate, efficient, safe and reasonable service and facilities for all of its customers.

By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare

favorably to the rates of other electric utilities in the region. In this filing, PP&L is proposing an overall average increase in retail base rates of approximately \$261 million, or 11.7%, which is not unreasonable or excessive. Under the Company's proposal, average residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:



Paul E. Russell
Its Attorney

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

Dated: March 14, 1995
at Allentown, Pennsylvania

ORIGINAL

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

RECEIVED
95 FEB 21 AM 9:54
PA. P. U. C.
INFO. CONTROL DIV.

Please Print:

R-9432 7100056

1. Your Name, Mailing Address and Telephone Number

Name Frank Oese, Sr.

Street/P.O. Box 2131 Reading Blvd. Apt#

City West Lawn State PA Zip 19609

County Berks Home Telephone-Area Code (610) 678-2030

Work Telephone-Area Code () none

2. Which company does your complaint concern?

Name of Company P.P. & L. Co.

3. What is your complaint?

My complaint is that I cannot understand how P.P. & L. Co. wants to increase billing
to residential customers at a rate of 21% when the cost of living raise from Social
Security is only 2.8% for the past two years

DOCKETED

FEB 28 1995

DOCUMENT
FOLDER

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

(-over-)

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

I would like Public Utilities Commission to check why P.P. & L. Co.'s profits have to
exceed the cost of living - according to Government statics. Why do residential
customers pay more than commercial?

(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.

Frank Oese Sr

2/17/95

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

Date Signed

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

Lawyer's Name _____

Street _____

City _____ **State** _____ **Zip** _____

Telephone Number-Area Code () _____

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PO BOX 3265, HARRISBURG, PA 17105-3265
February 24, 1995

R-943271C0055

PAUL E RUSSELL, ESQUIRE
PENNSYLVANIA POWER & LIGHT CO
TWO NORTH NINTH STREET
ALLENTOWN PA 18010-1179

Dear Sir:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

DOCUMENT
FOLDER

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

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

Very truly yours,

for John G. Alford, Secretary

fao
Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
February 24, 1995

CHARLES E ESTERBROOK

Complaint Docket
No. R-943271C0055

v.

PENNSYLVANIA POWER & LIGHT CO.

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: PENNSYLVANIA POWER & LIGHT CO.

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 PA 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).

DOCUMENT
FOLDER

DOCKETED
FEB 24 1995

2. If you fail to either satisfy this complaint or to file an answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 53 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

ORIGINAL

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

FAX: 610/774-6726

March 14, 1995

RECEIVED
MAR 14 1995

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

SECRETARY'S OFFICE
Public Utility Commission

DOCUMENT
FOLDER

Re: **Charles E. Esterbrook v.**
Pennsylvania Power & Light Company
Docket No. R-00943271C0055

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Charles E. Esterbrook
The Honorable Michael C. Schnierle

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Charles E. Esterbrook

v.

Pennsylvania Power & Light
Company

:
:
: Complaint Docket
: No. R-00943271C0055
:
:
:

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

Charles E. Esterbrook
45 Park Street
Akron, Pennsylvania 17501

Dated this 14th day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Charles E. Esterbrook

v.

Pennsylvania Power & Light
Company

DOCUMENT
FOLDER

Complaint Docket
No. R-00943271C0055

DOCKETED
MAR 16 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 knowledge or information sufficient to respond to Complainant's statements regarding his personal finances.

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

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

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

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

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

By way of further answer, all of PP&L's previous retail rate changes have been approved by the Pennsylvania Public Utility Commission; have been just

and reasonable; and have been in full compliance with all applicable provisions of PP&L's Tariff Electric Pa. P.U.C. No. 200, the Public Utility Code and the Commission's regulations.

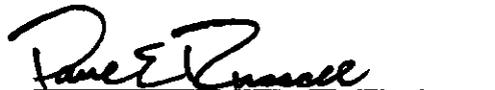
4. This paragraph constitutes a prayer for relief to which no answer is required.

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:



Paul E. Russell
Its Attorney

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

Dated: March 14, 1995
at Allentown, Pennsylvania

