

FORMAL COMPLAINT FORM

Pennsylvania Public Utility Commission

R-00943271C0001  
110500

ROCKETED  
JAN 13 1995

Please Print:

ORIGINAL

1. Your Name, Mailing Address and Telephone Number

KJR

Name GARY M. BOOTAY

Street/P.O. Box 6. MANOR DRIVE ~~APR~~ KIMBERLEY MEADOWS

City MECHANICSBURG State PA Zip 17055

County CUMBERLAND Home Telephone-Area Code (717) 766-2162

Work Telephone-Area Code (717) 790-2662 TDD

RECEIVED  
95 JAN 10 AM 9:35  
PA. P. J. C.  
INFO. CONTROL DIV.

2. Which company does your complaint concern?

Name of Company PP&L **DOCUMENT FOLDER**

3. What is your complaint?

I object to the proposed 20.7% residential customer rate increase, especially in light of only a 2.4% commercial customer rate increase - This is especially true for total electric home customers which use (sometimes) as much <sup>or</sup> more electric as commercial customers.

In 1963 when I had my home build I had a choice of oil or electric heat. PP&L told us my electric rate will be pro-rated. In other words, the more electric I use, the lower the rate. Based on that agreement, I went ahead and build a total electric home.

In Nov'94 I used 2,296 KWH and paid \$162.91 (under budget plan). I want PUC to force PP&L to honor a pro-rated electric rate plan for total electric home customers and I want PUC to maintain the rate

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

increase between residential and commercial at the same percentage but no more (-over-) than 5%.



KJR

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

DATE SERVED: January 18, 1995

R-00943271C0001

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

DOCUMENT  
FOLDER

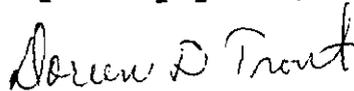
R-00943271C0001

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

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: January 18, 1995

Gary M. Bootay  
Complainant

VS.

Complaint Docket  
No: R-00943271C0001

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCKETED  
JAN 13 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

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

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

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

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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

ORIGINAL

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

February 6, 1995

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

RECEIVED

FEB 06 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Re: **Gary M. Bootay v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0001**

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. Gary M. Bootay  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER



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.

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 2,300 KWH (Complainant's use in November 1994) will increase by less than 10%. 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:



Paul E. Russell  
Its Attorney

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

Dated: February 6, 1995  
at Allentown, Pennsylvania



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Gary M. Bootay

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0001

---

CERTIFICATION OF SERVICE

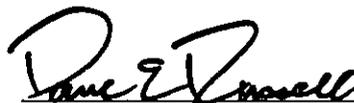
---

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. Gary M. Bootay  
6 Manor Drive  
Mechanicsburg, Pennsylvania 17055

Dated this 6th day of February.

  
Paul E. Russell

**ORIGINAL**

**COMPLAINT**

PUBLIC UTILITY COMMISSION

JAN 10 1995

BEFORE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

BUREAU OF CONSUMER SERVICES  
DIVISION OF FIELD SERVICES

For Commission Use Only:		
COMPLAINT DOCKET NO. <u>R-00943271C0002</u>	REF. # _____	UTILITY CODE <u>110500</u>
_____ VS. _____		

PLEASE PRINT:

RECEIVED

1. YOUR NAME, ADDRESS AND TELEPHONE NUMBER.

Name CONCERNED CITIZENS OF SCHUYLKILL COUNTY INC.

JAN 10 1995

Street POST OFFICE BOX 37

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

City MC ADOO State PA. Zip 18237

County SCHUYLKILL Home Telephone-Area Code (717) 9293050

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

DOCKETED  
JAN 13 1995

2. COMPANY YOU ARE COMPLAINING ABOUT.

Name P.P. & L.

3. WHAT IS YOUR COMPLAINT (DESCRIBE PROBLEM).

DOCUMENT  
FOLDER

THE MEMBERS FIND THE PROPOSED 20.7% RATE TO BE  
EXCESSIVE IN VIEW OF THE COLA'S RECEIVED BY

PEOPLE ON FIXED INCOME, THAT IN ADDITION TO

SCHOOL TAXES AND OTHER TAXES AND COST OF LIVING

EXPENSES.

I HAVE BEEN ASKED BY THE MEMBERS TO FILE AN INFORMAL  
COMPLAINT.

PEOPLE ALSO HAVE FEARS OF THE DOWN SIZING OF THE

COMPANY AND IF ALL CUSTOMER NEEDS WOULD BE MET.

(More Space On Back)

For Commission Use Only:		
DATE FILED <u>___/___/___</u>	MONITOR <u>_____</u>	BUREAU <u>_____</u>

36

2921 31 11/1

Multiple horizontal lines for writing.

(If You Need More Space Attach Paper)

4. WHAT DO YOU WANT US TO DO?

REQUESTING A HEARING IN OUR AREA SO EVERYONE CAN EXPRESS THEIR VIEWS.

Multiple horizontal lines for writing.

(If You Need More Space Attach Paper)

YOU MUST SIGN HERE



*Vicki Mackin* President CESC

Signature of complainant or attorney for corporate complainant

PUT TODAY'S DATE HERE



1-8-95

Today's Date

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 \_\_\_\_\_

Street \_\_\_\_\_

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

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

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

DATE SERVED: January 18, 1995

R-00943271C0002

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

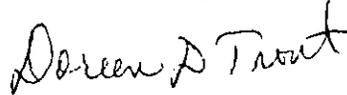
DOCUMENT  
FOLDER

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

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: January 18, 1995

Vicki Mackin for  
Concerned Citizens of  
Schuylkill County, Inc.  
Complainant

Complaint Docket  
No: R-00943271C0002

VS.

Pa Power & Light Co  
Respondent

DOCKETED  
JAN 13 1995

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

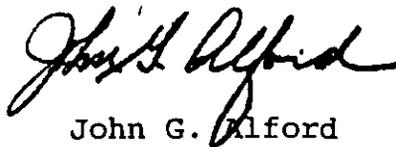
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



Pennsylvania Power & Light Company

ORIGINAL

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

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

KJB

FAX: 610/774-6726

February 6, 1995

RECEIVED

FEB 06 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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

**Re: Vicki Mackin for Concerned Citizens  
of Schuylkill County, Inc. v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0002**

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. Vicki Mackin for Concerned  
Citizens of Schuylkill County, Inc.  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Vicki Mackin for Concerned  
Citizens of Schuylkill County, Inc.

Complaint Docket  
No. R-00943271C0002

v.

Pennsylvania Power & Light  
Company

RECEIVED

FEB 06 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

---

**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 sufficient knowledge to respond to

Complainant's statements regarding the finances of people on fixed income.

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

- 1 -  
DOCUMENT  
FOLDER

DOCKETED

FEB 13 1995

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.

PP&L denies the implication in the Complaint that the Company's down-sizing efforts may adversely affect its ability to fully meet all customer needs.

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 6, 1995  
at Allentown, Pennsylvania



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Vicki Mackin for Concerned  
Citizens of Schuylkill County, Inc.

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0002

---

**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. Vicki Mackin for  
Concerned Citizens of Schuylkill County, Inc.  
P. O. Box 37  
McAdoo, Pennsylvania 18237

Dated this 6th day of February.



Paul E. Russell

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

R-00943271C0003  
110500

**ORIGINAL**

**RECEIVED**  
95 JAN 18 AM 9:04  
PA. P. U. C.  
INFO. CONTROL DIV.

Please Print:

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

Name Swatara Township

Street/P.O. Box 599 Eisenhower Boulevard Apt# \_\_\_\_\_

City Harrisburg State Pennsylvania Zip 17111-2397

County Dauphin Home Telephone-Area Code ( ) : N/A.

Work Telephone-Area Code ( 717 ) 564-2551

**DOCKETED**  
JAN 20 1995

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

Name of Company Pennsylvania Power and Light Company

**3. What is your complaint?**

This complaint is being filed on behalf of the Board of Commissioners of Swatara Township and the residential and other Swatara Township customers of Pennsylvania Power and Light Company (PP&L). While it may be true that it has been a long time since the company had a rate increase, an overall increase of 11.7% is inconsistent with growth in the cost of living. Further, the 20.7% increase for "typical" residential customers is particularly objectionable, because it places an inordinate share of the proposed total rate increase on that class of customers which cannot pass the increase on to others.

**DOCUMENT  
FOLDER**

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

14

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

The PUC should carefully evaluate the PP&L request for a rate increase to ensure that the total requested does not exceed the needs of the Company. The PUC should structure whatever increase may be granted to provide for a fairer distribution of costs to the various classes of customers than that proposed by the Company, so as to not penalize one class.

(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.

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

1/13/95  
Date Signed

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

7107 M 10th  
Lawyer's Name \_\_\_\_\_  
3711 10th  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Telephone Number-Area Code ( ) \_\_\_\_\_

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

DATE SERVED: January 20, 1995

R-00943271C0003

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

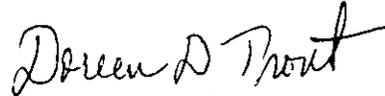
DOCUMENT  
FOLDER

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

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: January 20, 1995

**DOCKETED**  
JAN 20 1995

James R. Brokenshire for  
Swatara Township  
Complainant

VS.

Complaint Docket  
No: R-00943271C0003

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

**TAKE NOTICE:**

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

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

DOCUMENT  
FOLDER

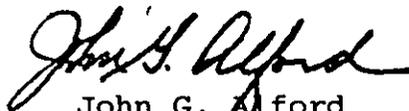
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

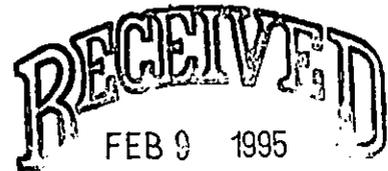
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

KJR

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

FAX: 610/774-6726

February 9, 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: James R. Brokenshire for Swatara Township v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0003**

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,

**DOCUMENT  
FOLDER**

Paul E. Russell

Enclosures

cc: Mr. James R. Brokenshire for  
Swatara Township  
The Honorable Michael C. Schnierle

2/10  
11

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED  
FEB 9 1995

SECRETARY'S OFFICE  
Public Utility Commission

James R. Brokenshire for  
Swatara Township

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0003

DOCKETED  
FEB 17 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 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

DOCUMENT  
FOLDER 1

residential rates will increase by 15.3%; average commercial rates will increase by 7.8%; and average industrial rates (firm power) will increase by 7.9%.

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

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

Paul E. Russell  
Its Attorney

Dated: February 9, 1995  
at Allentown, Pennsylvania



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

James R. Brokenshire for  
Swatara Township

v.

Pennsylvania Power & Light  
Company

:  
:  
: Complaint Docket  
: No. R-00943271C0003  
:  
:  
:

---

**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

James R. Brokenshire for Swatara Township  
599 Eisenhower Boulevard  
Harrisburg, Pennsylvania 17111-2397

Dated this 9th day of February.

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

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

R-00943271C0004  
110500

**ORIGINAL**

RECEIVED  
KJR  
95 JAN 18 AM 8:52  
PA. P. U. C. DIV  
INFO. CONTROL. DIV

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name JACK A. BAKER  
Street/P.O. Box 119 W. COOVER ST Apt# —  
City Mechanicsburg State PA Zip 17055  
County Cumberland Home Telephone-Area Code (717) 766-7566  
Work Telephone-Area Code (—) Retired —

**DOCKETED**  
JAN 20 1995

2. Which company does your complaint concern?

Name of Company P.P. + L.

3. What is your complaint?

P.P. + L.'s proposed rate increase of 20.7% for a residential customer is too high.

I am retired, a home owner, and on a fixed income. That means my pension increases only when legislated.

For the past 5 years, my electric usage has remained constant. The cost of my electric service has risen about 18%, or a little over 3% per year. This increase in my cost is acceptable, and affordable.

The proposed rate increase of 20.7% is NOT AFFORDABLE!

Also, how can P.P. + L ask for a rate increase of 20.7% from a residential customer; and then ask for a rate increase of only 2.4% from a commercial customer; or 9.1% from industry? This does not seem to be rationally fair.

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

(-over-)

**DOCUMENT  
FOLDER**

15

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

I am hopeful the PUC can keep the P.P.I.L customer rate  
increases down to a reasonable and affordable level.

(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.

Jack A. Baker

Jan. 12, 1995

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

Date Signed

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

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

Street \_\_\_\_\_

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

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

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

KJR

DATE SERVED: January 20, 1995

R-00943271C0004

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

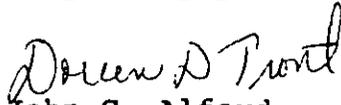
DOCUMENT  
FOLDER

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

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

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

Very truly yours,

  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**DOCKETED**

JAN 20 1995

DATE SERVED: January 20, 1995

Jack A Baker  
Complainant

VS.

Complaint Docket  
No: R-00943271C0004

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

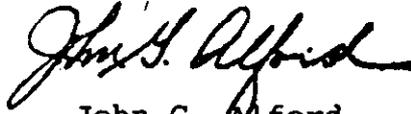
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



Pennsylvania Power & Light Company

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

ORIGINAL

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

FAX: 610/774-6726

February 9, 1995

RECEIVED  
FEB 9 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: **Jack A. Baker v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0004

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

DOCUMENT  
FOLDER

Enclosures

cc: Mr. Jack A. Baker  
The Honorable Michael C. Schnierle

2/10  
"



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

Paul E. Russell  
Its Attorney

Dated: February 9, 1995  
at Allentown, Pennsylvania



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Jack A. Baker

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0004

---

**CERTIFICATION OF SERVICE**

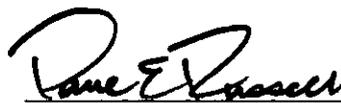
---

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. Jack A. Baker  
119 W. Coover Street  
Mechanicsburg, Pennsylvania 17055

Dated this 9th day of February.

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

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

R-00943271C0005  
110500

Please Print:

**ORIGINAL**

**RECEIVED**  
95 JAN 18 AM 11:28  
PA. P. U. C. DIV.  
INFO. CONTROL DIV.

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

Name Elaine Scheidler  
Street/P.O. Box 1130 Loop Drive Apt#   
City Harrisburg State PA Zip 17112-2151  
County Dauphin Home Telephone-Area Code (717) 541-1073  
Work Telephone-Area Code (717) 541-1073

**DOCKETED**  
JAN 20 1995

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

Name of Company PP+L

**3. What is your complaint?**

The PP+L proposed to increase the electric rate for residential  
customers using 500 kilowatt-hours by 20.7% as of Feb. 28, 1995.  
The proposed increases for commercial customers is 2.4% and  
for industrial customers 9.1%.

My two complaints are as follows:

(1) 20.7% is too high of an increase to place upon a  
customer, especially when he has no alternative competitors  
to choose for service.

(2) The rate increases are not equitable - the percentages are  
not the same for everyone. An increase in industrial rates is merely  
passed on to the consumer in raising the price of the product,  
one ~~consumer~~ individual customer bears the price increase alone.

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

(-over-)

**DOCUMENT  
FOLDER**

48

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

To not allow the P+L to impose the proposed rate increases. Firstly, they shouldn't be allowed the full amount of their proposed increase. Secondly, the increase should be the same for the residential, commercial, + industrial customer.

The highest increase is being passed on to those who can least afford to hire lawyers to oppose it.

(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.

Elaine Schindler

1-11-95

Signature of complaining person, or officer

Date Signed

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

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

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

Street \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip \_\_\_\_\_

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

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

DATE SERVED: January 20, 1995

R-00943271C0005

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

DOCUMENT  
FOLDER

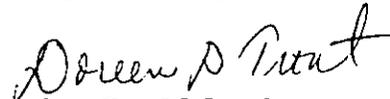
R-00943271C0005

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

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

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

Very truly yours,

  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: January 20, 1995

Elaine Scheidler  
Complainant

DOCKETED  
JAN 20 1995

VS.

Complaint Docket  
No: R-00943271C0005

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

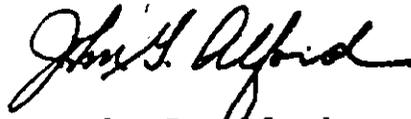
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

February 9, 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: **Elaine Scheidler v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0005**

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,

DOCUMENT  
FOLDER

Paul E. Russell

Enclosures

cc: Ms. Elaine Scheidler  
The Honorable Michael C. Schnierle

2/10  
"

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED  
FEB 9 1995

SECRETARY'S OFFICE  
Public Utility Commission

Elaine Scheidler

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0005

DOCKETED  
FEB 17 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 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

DOCUMENT  
FOLDER

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

Dated: February 9, 1995  
at Allentown, Pennsylvania



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Elaine Scheidler

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0005

---

**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. Elaine Scheidler  
1130 Loop Drive  
Harrisburg, Pennsylvania 17112-2151

Dated this 9th day of February.



---

Paul E. Russell

FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0006  
110500

ORIGINAL

Please Print:

RECEIVED  
95 JAN 18 AM 10:48  
P.A. P.U. C. DIV.  
INFO. CONTROL DIV.

1. Your Name, Mailing Address and Telephone Number

Name HAROLD C. LANDES  
Street/P.O. Box 2680 N. Old Bethlehem Pike Apt#  
City DUAKERTOWN State Penna. Zip 18951  
County BUCKS Home Telephone-Area Code (215) 536-1987  
Work Telephone-Area Code ( ) Retired

2. Which company does your complaint concern?

Name of Company P. P. & L.  
Pennsylvania Power & Elec.

DOCKETED  
JAN 20 1995

3. What is your complaint?

We read in the paper (Morning Call) about our  
elec. going up. We truly can't afford a  
higher elec. Bill like that. We skimp and  
try to save now as it is on our elec. bill.  
I have to pay out around \$700.00 a month  
on my husband's medicine, besides our  
Health Ins. There has to be a limit.  
We are on a limited income. We are both  
retired, we have no extra income coming in  
We sit in our living room with 1 - light on -  
Some people have 2 - 4 lights on. Our place  
is all elec.

Now we can't get out to a hearing as I  
can't take my husband out. He has a very

(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?

very bad heart and is a very bad case of Parkinsons disease. He can't walk to well without help. I can't do this alone. I have to get people to do things for us now.

We don't even get to go to Church any more so now you see we can't afford a higher rate. Bill.

If you need to know anything else call me @ 215-536-1487

We are willing to answer by phone Mrs. Harold C. Landes

(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.

Mrs. & Mrs. Harold C. Landes

1-12-95

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

Date Signed

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

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

Street \_\_\_\_\_

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

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

We really can't afford one

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

KJR

DATE SERVED: January 20, 1995

R-00943271C0006

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

DOCUMENT  
FOLDER

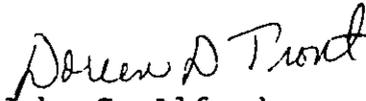
R-00943271C0006

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

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

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

Very truly yours,

  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: January 20, 1995

**DOCKETED**  
JAN 20 1995

Harold C. Landes  
Complainant

VS.

Complaint Docket  
No: R-00943271C0006

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

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

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

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

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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

ORIGINAL

KJR

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

FAX: 610/774-6726

RECEIVED  
FEB 9 1995

February 9, 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: **Harold C. Landes v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0006

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

DOCUMENT  
FOLDER 1

cc: Mr. Harold C. Landes  
The Honorable Michael C. Schnierle

2/10  
11

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED  
FEB 9 1995

SECRETARY'S OFFICE  
Public Utility Commission

Harold C. Landes

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0006

DOCKETED  
FEB 17 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 sufficient knowledge to respond to

DOCUMENT  
FOLDER

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 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.

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

Dated: February 9, 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.



*Raymond F. Suhocki*  
\_\_\_\_\_

Sworn to and subscribed  
before me this 8<sup>th</sup> day  
of February, 1995.

*Francine A. Greenzweig*  
\_\_\_\_\_

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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Harold C. Landes

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0006

---

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

Dated this 9th day of February.



---

Paul E. Russell

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

R-00943271C0007  
110500

KJR

Please Print:

**ORIGINAL**

RECEIVED  
95 JAN 18 AM 10:48  
PA. P. U. C.  
INFO. CONTRL. DIV.

1. Your Name, Mailing Address and Telephone Number

Name LAURA N. HAGER

Street/P.O. Box 224 W. WALNUT ST Apt#

City LANCASTER State PA Zip 17603

County LANCASTER Home Telephone-Area Code 717 397-5919

Work Telephone-Area Code 717 393-9776

2. Which company does your complaint concern?

Name of Company PP&L

3. What is your complaint?

PROPOSED RATE HIKE IS  
EXCESSIVE.

**DOCKETED**  
JAN 20 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?

DENY PPL'S REQUEST

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

5. You must sign and date your complaint.

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

Laura D. Hayer

1.17.95

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

KJR

DATE SERVED: January 20, 1995

R-00943271C0007

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

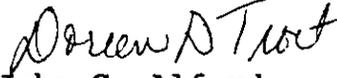
DOCUMENT  
FOLDER

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

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

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

Very truly yours,

  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: January 20, 1995

**DOCKETED**  
JAN 20 1995

Laura N Hager  
Complainant

VS.

Complaint Docket  
No: R-00943271C0007

Pa Power & Light Co  
Respondent

---

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

---

TO: Pa Power & Light Co

**TAKE NOTICE:**

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

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

**DOCUMENT  
FOLDER**

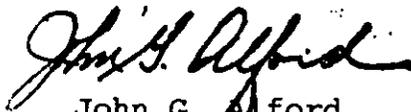
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

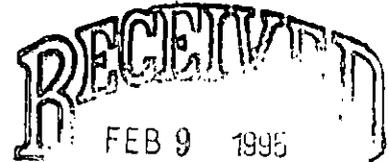
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

February 9, 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: **Laura N. Hager v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0007

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

DOCUMENT  
FOLDER |

cc: Ms. Laura N. Hager  
The Honorable Michael C. Schnierle

2/10  
11

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION FEB 9 1995

RECEIVED

SECRETARY'S OFFICE  
Public Utility Commission

Laura N. Hager

Complaint Docket  
No. R-00943271C0007

v.

Pennsylvania Power & Light  
Company

DOCKETED  
FEB 17 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 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.

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

Dated: February 9, 1995  
at Allentown, Pennsylvania



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Laura N. Hager

:  
:  
:  
Complaint Docket  
No. R-00943271C0007

v.

Pennsylvania Power & Light  
Company

---

**CERTIFICATION OF SERVICE**

---

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

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

Ms. Laura N. Hager  
224 W. Walnut Street  
Lancaster, Pennsylvania 17603

Dated this 9th day of February.



Paul E. Russell



DOCUMENT  
FOLDER

OFFICE OF CONSUMER ADVOCATE  
1425 Strawberry Square  
Harrisburg, Pennsylvania 17120

KJR

IRWIN A. POPOWSKY  
Consumer Advocate

ORIGINAL

(717) 783-5048

January 23, 1995

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

Re: Pa. Public Utility  
Commission v. Pennsylvania  
Power & Light Company,  
Docket No. R-00943271 *C0008*

Dear Secretary Alford:

Enclosed please find for filing an original and three  
copies of the Office of Consumer Advocate's Formal Complaint and  
Public Statement in the above-captioned proceeding.

Sincerely,

*Mary C Kenney*  
Mary C. Kenney  
Assistant Consumer Advocate

Enclosures

cc: Paul Russell, Esq.  
Office of Trial Staff  
Office of Special Assistants  
Office of Small Business Advocate

17839

DOCKETED  
JAN 24 1995

RECEIVED  
95 JAN 23 AM 10:17  
PA. P. U. C.  
INFO. CONTROL DIV.

FORMAL COMPLAINT  
BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED  
95 JAN 23 AM 10:17  
PA. P.U.C.  
INFO. CONTROL DIV.

For Commission Use Only:

COMPLAINT DOCKET NO. \_\_\_\_\_ REF. # \_\_\_\_\_ UTILITY CODE \_\_\_\_\_  
\_\_\_\_\_ VS. \_\_\_\_\_

PLEASE PRINT:

DOCKET  
JAN 24 1995

1. YOUR NAME, ADDRESS AND TELEPHONE NUMBER.

Name Irwin A. Popowsky, Consumer Advocate  
Street 1425 Strawberry Square  
City Harrisburg State Pennsylvania Zip 17120  
County Dauphin Work Telephone-Area Code (717) 783-5048

2. COMPANY YOU ARE COMPLAINING ABOUT.

Name Pennsylvania Power & Light Company

3. WHAT IS YOUR COMPLAINT? (DESCRIBE PROBLEM).

A. On December 30, 1994, Pennsylvania Power & Light Company ("PP&L" or "Company") filed Tariff Supplement No. 50 to Tariff Electric - Pa. P.U.C. No. 200, setting forth proposed changes and increases in base rates. Supplement No. 50, if approved as proposed, would allow the Company to recover an estimated annual increase in base rate operating revenues of \$261 million. The increase requested by the Company represents an approximate 11.7% increase in PP&L's annual retail base revenues.

For Commission Use Only:

DATE FILED \_\_\_\_ / \_\_\_\_ / \_\_\_\_ MONITOR \_\_\_\_\_ BUREAU \_\_\_\_\_

- B. As of September 30, 1994, PP&L was engaged in the business of furnishing electric service to 1,207,606 customers, of which approximately 1,063,272 were residential customers. PP&L provides electric service in portions of 29 counties in the central-eastern Commonwealth of Pennsylvania.
- C. If the rates were approved as proposed by the Company, the total bill for a residential customer who uses 500 kilowatt-hours per month would increase by \$9.30 per month, or by 20.7%, from approximately \$44.82 per month to \$54.12 per month. This customer's annual bill would increase from \$537.84 to \$649.44.
- PP&L is proposing a \$2.40 increase to its residential customer charge to increase it from \$4.80 per month to \$7.20 per month.
- D. PP&L's proposed tariff, if approved, would allow the Company an overall rate of return of 10.22% on its investment, and a 13.00% return on common equity.
- E. The Consumer Advocate is empowered to represent the interests of consumers before the Pennsylvania Public Utility Commission, pursuant to Act 161 of the General Assembly, as amended, 71 P.S. §§ 309-1, et seq.
- F. A preliminary examination of the Company's filed Tariff Supplements 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. § 1301, et seq.
- G. The Company's proposed increase in base rate revenues contains a claim for a return on common equity associated with the Susquehanna Steam Electric Station Unit 2. The OCA avers that the Susquehanna Steam Electric Station Unit 2 does or may constitute

physical and/or economic excess capacity and that all or a portion of the costs of such facility may be disallowed pursuant to Sections 1301, 1315, and 1323 of the Public Utility Code.

- H. The Consumer Advocate's preliminary examination of the Company's Tariff Supplements indicates other claims that, if allowed, may result in rates that are unjust, unreasonable, in violation of law or otherwise contrary to sound ratemaking principles. These claims include, but are not limited to, a claim for decommissioning costs associated with fossil fuel plants, increased costs associated with nuclear plant decommissioning, costs associated with changes in depreciation methodology, costs associated with accounting changes such as Financial Accounting Standards No. 106, costs associated with social program expenditures, costs associated with environmental remediation and costs associated with amortization of "early window" deferrals.
- I. In addition, the Company's proposal for future Energy Cost Rate recovery of costs associated with the phase out of the power purchase agreement with Jersey Central Power & Light Company may be unjust, unreasonable and unlawful in violation of Sections 1301 et seq., 1307, and 1308 of the Pennsylvania Public Utility Code, or otherwise contrary to sound ratemaking principles.
- J. The Consumer Advocate also avers that the proposed tariff changes, revenue allocation and rate design are or may be unlawfully discriminatory, in violation of the Public Utility Code, 66 Pa. C.S. §§ 1301 and 1304, et seq., and may otherwise be contrary to sound ratemaking principles and public policy.
- K. In addition, the OCA avers that PP&L's present rates are or may be excessive, unjust, unreasonable and unduly discriminatory.

- L. The Consumer Advocate files this complaint to insure that the Commission fully and fairly adjudicates 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.

4. WHAT DO YOU WANT US TO DO?

The Consumer Advocate respectfully requests that the Public Utility Commission:

- A. Suspend and investigate the operation of proposed Supplement No. 50, pursuant to Section 1308(d) of the Public Utility Code, 66 Pa. C.S. § 1308(d);
- B. Consolidate all complaints filed against proposed Supplement No. 50;
- C. Hold full evidentiary hearings examining the reasonableness of PP&L's current rates and its proposed increases in rates, including any and all proposed modifications to rate policy;
- D. After providing the public with adequate notice, 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 hold those hearings as early in the case as feasible;
- E. 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;
- F. Determine the justness and reasonableness of Respondent's current and proposed rates; and
- G. 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.

  
Signature of complainant

January 23, 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 Mary C. Kenney, Assistant Consumer Advocate  
Tanya J. McCloskey, Assistant Consumer Advocate  
Gicine P. Brignola, Assistant Consumer Advocate

Street 1425 Strawberry Square

City Harrisburg State PA Zip 17120

Telephone Number-Area Code (717) 783-5048

PUBLIC STATEMENT OF THE CONSUMER ADVOCATE ISSUED IN ACCORDANCE WITH SECTION 904-(e) OF ACT OF APRIL 9, 1929 (P.L. 177, No. 175), KNOWN AS "THE ADMINISTRATIVE CODE OF 1929", AS AMENDED BY ACT 161 OF 1976 (APPROVED JULY 9, 1976)

Act 161 of the Pennsylvania General Assembly, 71 P.S. § 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interest of consumers before the Pennsylvania Public Utility Commission ("PUC" or "Commission"). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file a Formal Complaint and participate in proceedings before the Commission involving the proposed rate increase requested by Pennsylvania Power & Light Company ("PP&L" or "Company").

PP&L's proposed tariff, if approved, would allow the Company an annual increase in base rate operating revenue of \$261 million, or approximately an 11.7% increase in PP&L's annual retail base revenues. If the rates were approved as proposed by the Company, the total bill for a residential customer using 500 Kwh per month would increase by \$9.30 per month, or by 20.7%, from approximately \$44.82 per month to \$54.12 per month. This customer's annual bill would increase from \$537.84 to \$649.44. PP&L is proposing a \$2.40 increase to its residential customer charge to increase it from \$4.80 per month to \$7.20 per month.

PP&L's proposed increase is designed to allow the Company an overall rate of return of 10.22% on its investment, and an approximate 13.0% return on common equity to its shareholders. In addition to its other claims, the Company has sought to recover from ratepayers a return on common equity invested in Susquehanna Unit 2. In PP&L's previous rate case, the Pennsylvania Public Utility Commission had denied the Company a return on common equity invested in Susquehanna Unit 2 upon finding that the unit constituted excess capacity. The Company has also sought an increase in costs associated with decommissioning the Susquehanna Steam Electric Station, as well as the costs of a change in the depreciation method for these nuclear units.

PP&L's Tariff Supplements are designed to recover certain costs that, if allowed, may result in rates that are unjust, unreasonable, in violation of law or otherwise contrary to sound ratemaking

principles including, but not limited to, a claim for decommissioning costs associated with fossil fuel plants, costs associated with nuclear plant decommissioning, costs associated with changes in depreciation methodology, costs associated with accounting changes such as Financial Accounting Standards No. 106, costs associated with social program expenditures, costs associated with environmental remediation and costs associated with amortization of "early window" deferrals. In addition, the Company has proposed to recover future costs from ratepayers associated with the phase out of the power purchase agreement with Jersey Central Power & Light Company in its Energy Cost Rate as this transaction terminates.

The Consumer Advocate submits that the Company's proposed tariff rates may be unjust, unreasonable, unduly discriminatory and unlawful based upon information filed by the Company in support of its claim.

The objective of the Consumer Advocate in filing a Formal Complaint in this matter is to protect the interests of the Company's customers. The Consumer Advocate will seek to ensure that the Company is permitted to implement only a level of rates that is fully justified and in accordance with sound ratemaking principles. The Consumer Advocate will strive to prevent the Company from collecting from ratepayers any costs that cannot be justified, or are unreasonable or unduly discriminatory, or otherwise violative of the Public Utility Code and sound ratemaking principles.

The Consumer Advocate has filed this Formal Complaint and will, in the course of the proceedings, investigate the Company's proposed rate increase and request that the Public Utility Commission deny all proposed increases or changes which are not proven to be just, reasonable and in accordance with sound ratemaking principles and the Public Utility Code.



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

DOCUMENT  
FOLDER

IN REPLY PLEASE  
REFER TO OUR FILE

January 24, 1995

R-943271C0008

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

KJR

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

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

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

Very truly yours,

lpw  
Attachment

for: John G. Alford, Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
January 24, 1995

---

DOCUMENT  
FOLDER

OFFICE OF CONSUMER ADVOCATE

---

Complaint Docket  
No. R-9432710008

v.

PENNSYLVANIA POWER & LIGHT

---

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

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).

DOCKETED  
JAN 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

ORIGINAL

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

FAX: 610/774-6726

February 13, 1995

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

RECEIVED

FEB 13 1995

SECRETARY'S OFFICE  
Public Utility Commission

Re: **Office of Consumer Advocate**

v.

**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0008**

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,

DOCUMENT  
FOLDER

Paul E. Russell

Enclosures

cc: Irwin A. Popowsky, Esquire  
The Honorable Michael C. Schnierle



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Office of Consumer Advocate

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0008

**DOCKETED**  
FEB 22 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. A. Admitted. By way of further answer, an analysis of PP&L's retail rates demonstrates that those rates have remained relatively stable over the last decade; they have increased at a rate far below the general rate of inflation; and they compare favorably to the rates of other electric utilities in the region. 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.

**DOCUMENT  
FOLDER**

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%.

B. Admitted.

C. Admitted. The impact on individual customers may vary from the average rate class 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.

D. Admitted. By way of further answer, the Company's actual earned return will vary from its claims in this filing as circumstances on its system change over time.

E. Admitted.

F. Denied. 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.

G. 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.

H. Denied. As shown by the supporting information in 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 paragraph 3.F.

I. Denied. As shown by the supporting information in the filing, PP&L's proposal to recognize the cost of returning bulk power contracts in its Energy Cost Rate (ECR) is just and reasonable; the proposal is consistent with sound rate-making principles and the Public Utility Code.

J. Denied. The level of increase proposed for each class of customer is fully supported by and is consistent with the cost allocations and other data submitted in the filing. The proposed rates do not result in undue discrimination or preference between classes of service or customers. The proposed rates are consistent with sound ratemaking principles and the Public Utility Code.

K. 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.

L. Denied. See PP&L's answer to the foregoing subsections of this paragraph.

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 13, 1995  
at Allentown, Pennsylvania



**FORMAL COMPLAINT FORM**  
**Pennsylvania Public Utility Commission**  
R-00943271C0009  
110500

RECEIVED  
95 JAN 20 AM 9:38  
INFO. CONTROL DIV.  
PA. P.U.C. DIV.

Please Print:

**ORIGINAL**

1. Your Name, Mailing Address and Telephone Number

Name Wallace R & Doris M Fenner  
Street/P.O. Box 57 Apt# \_\_\_\_\_  
City Breinigsville State Pa Zip 18031  
County Lehigh Home Telephone-Area Code (610) 398-0267  
Work Telephone-Area Code ( ) \_\_\_\_\_

**DOCKETED**  
JAN 25 1995

2. Which company does your complaint concern?

Name of Company Penna Power & Light

3. What is your complaint?

Rate  
PP&L asking for a Residential Customer increase of 20.7 Percent

PP&L's letter saying they are asking for a rate increase of about 20+ Dollars a month. This is too much of an increase. I know they could do very well with less, perhaps let them increase a percentage each year to meet their expenses. I do not have PP&L's Budget but as a housewife & a retired Postmaster I feel very sure PP&L can make cuts in their Budget in order not to make it so hard on their customers. This is a time where every one including state & federal gov't is trying to make cuts so that should help PP&L when these cuts are into effect. PUC: I feel a \$5.00 increase a month is enough & a percent annual increase.

(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?

See # 3

(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.

*William R. Fenner & Thomas H. Fenner*

*01-17-95*

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

DATE SERVED: January 25, 1995

R-00943271C0009

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

DOCUMENT  
FOLDER

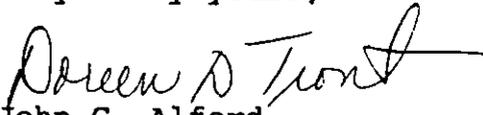
R-00943271C0009

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

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

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

Very truly yours,

  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: January 25, 1995

Wallace and Doris Fenner  
Complainant

VS.

Pa Power & Light Co  
Respondent

Complaint Docket  
No: R-00943271C0009

DOCKETED  
JAN 25 1995

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

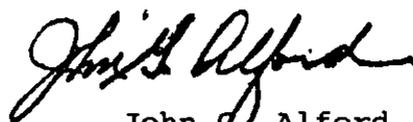
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

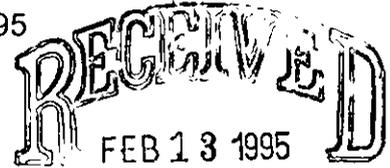
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

ORIGINAL

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

FAX: 610/774-6726

February 13, 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: **Wallace & Doris Fenner v.  
Pennsylvania Power & Light Company**  
Docket No. ~~R=00943271~~C0009

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,

DOCUMENT  
FOLDER

Paul E. Russell

Enclosures

cc: Mr. & Mrs. Wallace Fenner  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Wallace and Doris Fenner

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0009

RECEIVED  
FEB 13 1995

SECRETARY'S OFFICE  
Public Utility Commission

---

CERTIFICATION OF SERVICE

---

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

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

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

Dated this 13th day of February.

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

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Wallace and Doris Fenner

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0009

**RECEIVED**  
FEB 13 1995

---

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

SECRETARY'S OFFICE  
Public Utility Commission

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

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

rates demonstrates that those rates have remained relatively stable over the last decade; they have 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

**DOCKETED**  
FEB 22 1995

**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", written over a horizontal line.

Paul E. Russell  
Its Attorney

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

Dated: February 13, 1995  
at Allentown, Pennsylvania



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

R-00943271C0010  
110500

**ORIGINAL**

SAMUEL P. KALNY  
1106 W. LIVINGSTON ST.  
WHITEHALL, PA  
18052-6920

Please Print:

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

Name \_\_\_\_\_

Street/P.O. Box \_\_\_\_\_ Apt# \_\_\_\_\_

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

County \_\_\_\_\_ Home Telephone-Area Code (610) 439 0615

Work Telephone-Area Code (610) 820 2160

**DOCKETED**

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

JAN 25 1995

Name of Company P.P. & L.

RECEIVED  
95 JAN 23 AM 11:09  
PA. P. U. C.  
INFO. CONTROL DIV.

**3. What is your complaint?**

*The proposed percentage for the P.P. & L. rate hike is too high and too much of an increase to be levied on consumer's at one time. The company should restructure their increase to be more gradual to the customer's budget.*

**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?

To listen to my complaint and not to grant the PP&L the increase that it is proposing at this time.

I would like that the P.U.C. continue to regulate utilities as they have in the past. Utilities are not the same as general goods and services and should NOT be treated as such. They need to be REGULATED NOT "deregulated" they do not fit into the "competitive market" and should not be treated as competitive producers.

(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.

Samuel P. Kalny

1-20-95

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: January 25, 1995

R-00943271C0010

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

DOCUMENT  
FOLDER

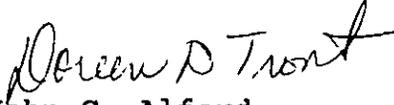
R-00943271C0010

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

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

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

Very truly yours,

  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: January 25, 1995

DOCKETED  
JAN 25 1995

Samuel P. Kalny  
Complainant

VS.

Complaint Docket  
No: R-00943271C0010

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

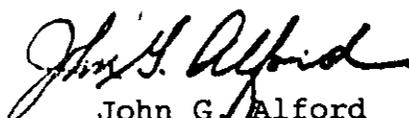
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

ORIGINAL

FAX: 610/774-6726

February 13, 1995

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

RECEIVED

FEB 13 1995

Re: **Samuel P. Kalny v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C00107

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

DOCUMENT  
FOLDER

cc: Mr. Samuel P. Kalny  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Samuel P. Kalny

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0010

---

CERTIFICATION OF SERVICE

---

RECEIVED

FEB 13 1995

SECRETARY OF  
PUBLIC UTILITY COMMISSION

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

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

Samuel P. Kalny  
1106 W. Livingston Street  
Whitehall, Pennsylvania 18052-6920

Dated this 13th day of February.



Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Samuel P. Kalny

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0010

**DOCKETED**  
FEB 22 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 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

**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 frequently cited is representative only for a residential customer using 500 KWH of electricity per month.

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

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

Paul E. Russell  
Its Attorney

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

Dated: February 13, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0011  
110500

RECEIVED

Please Print:

JAN 24 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

ORIGINAL

1. Your Name, Mailing Address and Telephone Number

Name MICHAEL P. MCRAIN

Street/P.O. Box RD1 BOX 1299 Apt#

City MOSCOW State PA Zip 18444

County WAYNE Home Telephone-Area Code (717) 842-1729

Work Telephone-Area Code ( )

2. Which company does your complaint concern?

Name of Company PPL

DOCKETED

JAN 25 1995

3. What is your complaint?

WITH BILLS SO HIGH, AND EVERYBODY RAISING  
THEIR RATES I CANNOT AFFORD IT, I WOULD LIKE  
TO HELP PUT A STOP TO THIS. I AM LIVING ON A  
FIXED INCOME AND CANNOT AFFORD IT. THIS RATE  
INCREASE THAT THEY ARE PROPOSING IS UN-  
CALLED FOR.

DOCUMENT

FOLDER

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

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

I WANT THEM NOT TO PUT A RATE INCREASE  
ON OUR POWER BILLS

(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.

Michael P. McLean

1-7-95

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: January 25, 1995

R-00943271C0011

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

DOCUMENT  
FOLDER

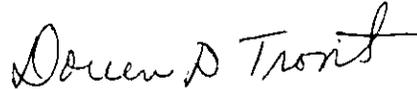
R-00943271C0011

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

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: January 25, 1995

Michael P. McLain  
Complainant

VS.

Pa Power & Light Co  
Respondent

DOCKETED  
JAN 25 1995

Complaint Docket  
No: R-00943271C0011

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

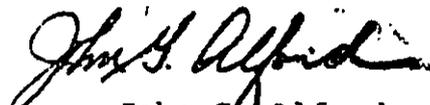
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

KJR

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

ORIGINAL

FAX: 610/774-6726

February 13, 1995

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

Re: **Michael P. McLain v.  
Pennsylvania Power & Light Company  
Docket No. R-0094327-1C001-1**

RECEIVED  
FEB 13 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

DOCUMENT  
FOLDER

cc: Mr. Michael McLain  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Michael P. McLain

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0011

RECEIVED

FEB 13 1995

---

CERTIFICATION OF SERVICE

---

SECRETARY'S OFFICE  
Public Utility Commission

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

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

Michael P. McLain  
RD 1, Box 1299  
Moscow, Pennsylvania 18444

Dated this 13th day of February.



Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Michael P. McLain

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0011

**DOCKETED**  
FEB 22 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 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

**DOCUMENT  
FOLDER**

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 frequently cited 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: February 13, 1995  
at Allentown, Pennsylvania



MCNEES, WALLACE & NURICK  
ATTORNEYS AT LAW

100 PINE STREET  
P. O. BOX 1166

HARRISBURG, PA 17108-1166

TELEPHONE (717) 232-8000

FAX (717) 237-5300

OF COUNSEL  
ROBERT H. GRISWOLD  
SAMUEL A. SCHRECKENGAUST, JR.

Original

January 30, 1995

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

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

DAVID M. WATTS, JR.  
STEVEN J. WEINGARTEN  
NEAL S. WEST  
NORMAN I. WHITE  
LAWRENCE R. WIEDER  
GARY F. YENKOWSKI  
WILLIAM M. YOUNG, JR.

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

ERIC N. ATHEY  
DAVID M. BAKER  
JONATHAN C. BERRY  
BRETT D. DAVIS  
JAMES P. DeANGELO  
JAMES P. DOUGHERTY  
KATHLEEN A. DUNST  
ROBERT J. GODUTO

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

VIA HAND DELIVERY

In Re: Pennsylvania Public Utility Commission, et al.  
v. Pennsylvania Power & Light Company  
Docket No. R-00943271 *E12*

Dear Secretary Alford:

Enclosed please find an original and two (2) copies of the Amended Complaint of PP&L Industrial Customer Alliance, formerly known as Lehigh Valley Power Committee, in the above-captioned proceeding. The Amended Complaint is filed pursuant to 52 Pa. Code § 5.91, in order to reflect the ad hoc association's name change.

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

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

Very truly yours,

MCNEES WALLACE & NURICK

By *David M. Kleppinger*  
David M. Kleppinger

DMK/gm  
Enclosures  
c: Certificate of Service

DOCUMENT  
FOLDER

RECEIVED  
95 JAN 30 PH 4:21  
PA. P. U. C.  
INFO. CONTROL DIV.

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION, ET AL.

v.

PENNSYLVANIA POWER & LIGHT  
COMPANY

DOCKET NO. R-00943271

AMENDED COMPLAINT

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

The PP&L Industrial Customer Alliance ("PPLICA" or the "Alliance"), formerly known as Lehigh Valley Power Committee, hereby files this Amended Complaint pursuant to 52 Pa. Code § 5.91, in order to reflect the ad hoc association's name change. In support thereof, the Alliance asserts as follows:

1. Complainants are the PP&L Industrial Customer Alliance, which for purposes of this proceeding includes:

Air Products and Chemicals, Inc.  
Appleton Papers Inc.  
Armstrong World Industries  
BOC Gases  
Chamberlain Manufacturing Corporation  
Hercules Cement Company  
Hershey Foods Corporation  
International Paper Company  
LaFarge Whitehall Cement  
Liquid Carbonic Industries  
Praxair, Inc.  
R. R. Donnelley & Sons  
Thomson Consumer Electronics, Inc.  
Victaulic Company of America

RECEIVED  
95 JAN 30 PM 4:21  
PA. P. U. C.  
INFO. CONTROL DIV.

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

DOCUMENT  
FOLDER

DOCKETED  
FEB 08 1995

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

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

3. Respondent utility is:

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

4. On December 30, 1994, Pennsylvania Power & Light Company ("PP&L" or "Company") filed Supplement No. 50 to Tariff Electric Pa. P.U.C. No. 200, proposing a \$261 million, or 11.7%, increase in its annual base rate revenues, to become effective on February 28, 1995.

5. On January 18, 1995, the Alliance filed a Complaint of the Lehigh Valley Power Committee against PP&L's proposed rate increase and tariff changes. On January 23, 1995, the Office of Consumer Advocate filed a Formal Complaint. On January 24, 1995, the Office of Small Business Advocate and the U.S. Department of Defense filed Complaints while Bethlehem Steel Corporation filed a Petition to Intervene. In addition, numerous letters and telephone calls from consumers protesting the rate increase have been received by the Commission.

6. On January 26, 1995, the Commission instituted an investigation into PP&L's proposed rate increase and suspended Supplement No. 50 for a period not longer than seven (7) months

from February 28, 1995, pursuant to Section 1308(d) of the Public Utility Code, 66 Pa.C.S. §1308(d).

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

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

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

- (a) The proposed distribution of the increase among customer classes;
- (b) The appropriate cost of service study methodology, including the issues of treatment of interruptible load and allocation of demand-related costs;
- (c) The design of the new Rate Schedule LP-6;

- (d) The design of, and proposed changes to, Rate Schedule LP-5;
- (e) The design of, and proposed changes to, interruptible rate provisions;
- (f) The requested return on common equity of 13% and overall rate of return of 10.17%;
- (g) The fossil fuel decommissioning fund and nuclear plant decommissioning fund;
- (h) The \$61 million depreciation expense claim;
- (i) Energy Cost Rate revisions and the Capacity and Energy Sales Agreement with Jersey Central Power & Light Company; and
- (j) The appropriate ratemaking recovery of costs associated with Statement of Financial Accounting Standards No. 106;
- (k) Excess capacity;
- (l) Social program expenditures and allocations;
- (m) Amortization of early window deferrals; and
- (n) Environmental remediation expense claim.

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

10. The relief sought by this Amended Complaint is that:

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

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

(c) PP&L be required at hearing to adduce evidence in justification of its proposed rate increase and tariff revisions, and that the Alliance be accorded full opportunity to cross-examine the Company's witnesses, present evidence and offer argument on their own behalf.

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

Respectfully submitted,

McNEES WALLACE & NURICK

By



---

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

Counsel for the PP&L Industrial  
Customer Alliance

Dated: January 30, 1995



**MEMBERS OF  
PP&L INDUSTRIAL CUSTOMER ALLIANCE**

Air Products and Chemicals, Inc.

Appleton Papers Inc.

Armstrong World Industries

BOC Gases

Chamberlain Manufacturing Corporation

Hercules Cement Company

Hershey Foods Corporation

International Paper Company

LaFarge Whitehall Cement

Liquid Carbonic Industries

Praxair, Inc.

R. R. Donnelley & Sons

Thomson Consumer Electronics, Inc.

Victaulic Company of America

**AMENDED APPENDIX "A"**

CERTIFICATE OF SERVICE

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

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

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

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

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

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

David A. McCormick, Esq.  
Office of The Judge Advocate General  
Department of the Army  
DAJA-RL 3848  
901 N. Stuart Street, Room 713  
Arlington, VA 22203-2960

  
David M. Kleppinger

Dated this 30th day of January, 1995, in Harrisburg, PA.

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

DATE SERVED: January 25, 1995

R-00943271C0012

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

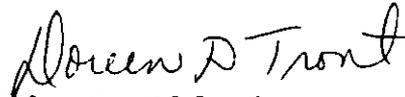
DOCUMENT  
FOLDER

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

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: January 25, 1995

David M, Kleppinger, Attorney,  
for Lehigh Valley Power  
Committee

Complainant

VS.

Pa Power & Light Co  
Respondent

Complaint Docket  
No: R-00943271C0012

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCKETED  
JAN 25 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

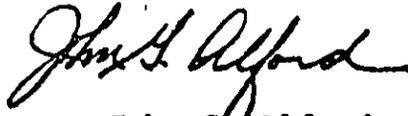
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



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

IN REPLY PLEASE  
REFER TO OUR FILE

R-943271C0012

February 1, 1995

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

TAE

LEHIGH VALLEY POWER COMMITTEE  
PP&L INDUSTRIAL CUSTOMER ALLIANCE

v

PENNSYLVANIA POWER & LIGHT COMPANY

Dear Mr. Russell:

Attached is copy of an amended complaint filed on behalf of the complainant in the above entitled proceeding.

Such answer as you desire to make to the amended complaint should be filed in this Office and served upon the complainant within 20 days from receipt of this letter.

DOCUMENT  
FOLDER

Very truly yours,

for: John G. Alford  
Secretary

lpw

cc: ALJ - w/copy of amended complaint  
OTS - w/copy of amended complaint

DOCKETED  
FEB 08 1995



**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

ORIGINAL

FAX: 610/774-6726

February 13, 1995

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

RECEIVED

FEB 13 1995

REGISTRATION OFFICE  
Public Utility Commission

**Re: PP&L Industrial Customer Alliance  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271G0012**

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,

DOCUMENT  
FOLDER

Paul E. Russell

Enclosures

cc: David M. Kleppinger, Esquire  
The Honorable Michael C. Schnierle

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PP&L Industrial Customer Alliance

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0012

RECEIVED

FEB 13 1995

SECRETARY'S OFFICE  
Public Utility Comm

---

CERTIFICATION OF SERVICE

---

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

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

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

Dated this 13th day of February.

  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PP&L Industrial Customer Alliance

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0012

---

ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

---

Pennsylvania Power & Light Company (hereafter "PP&L"), by its attorney, hereby answers the Complaint (as amended on February 1, 1995) in the above-captioned proceeding as follows:

1. Admitted in part, denied in part. PP&L admits that Complainants are the PP&L Industrial Customer Alliance (PPLICA). PP&L is without knowledge sufficient to respond to Complainants' statements regarding the membership of PPLICA.

2. Admitted.

3. Admitted.

4. Admitted.

**DOCKETED**  
FEB 22 1995

**DOCUMENT  
FOLDER**

5. Admitted in part, denied in part. PP&L admits that the formal complaints cited in this paragraph have been filed with the Commission. By way of further answer, PP&L has or, in the near future will, file timely answers to each of these complaints. PP&L is without information sufficient to respond to Complainants' statements regarding letters and telephone calls received by the Commission.

6. Admitted.

7. Admitted in part, denied in part. PP&L admits that it provides electric service to the companies identified as members of PPLICA. PP&L is without sufficient information to respond to Complainants' statements regarding their operations and the impact of PP&L's proposed base rate increase.

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

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

ted 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.

9. Denied. See PP&L's answer to paragraph 8.

10. 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", written over a horizontal line.

Paul E. Russell  
Its Attorney

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

Dated: February 13, 1995  
at Allentown, Pennsylvania

