

FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0086  
110500

KJR

Please Print:

ORIGINAL

RECEIVED  
95 FEB 27 AM 11:07  
PA. P. U. C. DIV.  
INFO. CONTROL

1. Your Name, Mailing Address and Telephone Number

Name MAYNARD E. ADAMS  
Street/P.O. Box 259 W 28th DIV. Hyw. Apt#  
City LITITZ State PA Zip 17543  
County LANCASTER Home Telephone-Area Code (717) 627-8226  
Work Telephone-Area Code ( ) RETIRED

2. Which company does your complaint concern?

Name of Company P P L

DOCKETED DOCUMENT  
MAR 01 1995  
FOLDER

3. What is your complaint?

I just can't see P.P.L. wants a 20.7  
increase on these Electric I can not see  
this kind of increase as banks only give  
2.27 per cent on savings.

My bill right now is \$42.00 a month  
with the increase it would be \$52.00 ten  
Dollars more. Social Security gave us \$1700  
Dollar increase which means it leaves me  
seven Dollars.

Theres a couple of million Retires here  
in Pennsylvania that will be hurting.

Thank you

Maynard E. Adams

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



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

DATE SERVED: March 1, 1995

R-00943271C0086

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 Maynard E. Adams. 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

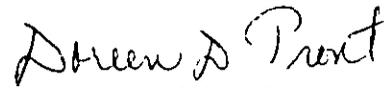
R-00943271C0086

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: March 1, 1995

Maynard E. Adams  
Complainant

**DOCKETED**  
MAR 01 1995

VS.

Complaint Docket  
No: R-00943271C0086

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

ORIGINAL

March 20, 1995

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

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Re: **Maynard E. Adams v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0086**

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. Maynard E. Adams  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Maynard E. Adams	:	
	:	
v.	:	Complaint Docket
	:	No. R-00943271C0086
Pennsylvania Power & Light	:	
Company	:	

RECEIVED

MAR 20 1995

CERTIFICATION OF SERVICE

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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

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

Mr. Maynard E. Adams  
259 W. 28th Div. Hyw.  
Lititz, Pennsylvania 17543

Dated this 20th day of March, 1995.

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



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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, not the 20.7% frequently cited.

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

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

Paul E. Russell  
Its Attorney

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

Dated: March 20, 1995  
at Allentown, Pennsylvania



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

R-00943271C0087  
110500

Please Print:

**ORIGINAL**

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

Name DIANE M Coyle

Street/P.O. Box 4531 PARK View Dr Apt# Q-17

City Schweaksville State PA Zip 18078

County Lehigh Home Telephone-Area Code (610) 799-3486

Work Telephone-Area Code (610) 439-8430

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

Name of Company PP&L

**RECEIVED**

**3. What is your complaint?**

20% INCREASE

FEB 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARYS BUREAU

**DOCKETED**  
MAR 01 1995

**DOCUMENT  
FOLDER**

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

(-over-)

130

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

Stop the INCREASE

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

5. You must sign and date your complaint.

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

Diane M. Boyle

2/23/95

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

Date Signed

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 1, 1995

R-00943271C0087

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 Diane M. Coyle. 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-00943271C0087

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: March 1, 1995

Diane M. Coyle  
Complainant

VS.

Pa Power & Light Co  
Respondent

DOCKETED  
MAR 01 1995

Complaint Docket  
No: R-00943271C0087

---

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

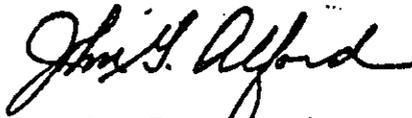
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

FAX: 610/774-6726

March 20, 1995

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

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSIO  
SECRETARY BUREAU

Re: **Diane M. Coyle v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0087**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Ms. Diane M. Coyle  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Diane M. Coyle

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0087

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSIO  
SECRETARY BUREAU

---

**CERTIFICATION OF SERVICE**

---

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

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

Ms. Diane M. Coyle  
4531 Park View Drive  
Schnecksville, Pennsylvania 18078

Dated this 20th day of March, 1995.

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



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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, not the 20.7% frequently cited.

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 20, 1995  
at Allentown, Pennsylvania



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

R-00943271C0088  
110500

Please Print:

**ORIGINAL**

RECEIVED  
95 FEB 27 AM 11:07  
PA. P.U. C. DIV.  
INFO. CONTR'L DIV.

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

Name Karen Phillips

Street/P.O. Box 443 5<sup>th</sup> St Apt# \_\_\_\_\_

City Whitehall State PA Zip 18052

County Lehigh Home Telephone-Area Code (610) 434 8395

Work Telephone-Area Code (610) 437-9200

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

Name of Company PP+L

**3. What is your complaint?**

The 20% increase on Electric -

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

**DOCKETED**  
MAR 01 1995

**DOCUMENT  
FOLDER**

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

(-over-)

18

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

Stop 20% increase -

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

5. You must sign and date your complaint.

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

Kenneth Phillips

2/23/98

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

Date Signed

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

Lawyer's Name

Street

City

State

Zip

Telephone Number-Area Code ( )

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

DATE SERVED: March 1, 1995

R-00943271C0088

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

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Karen Phillips. 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.

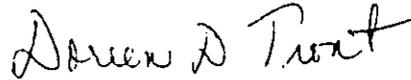
DOCUMENT  
FOLDER

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: March 1, 1995

DOCKETED  
MAR 01 1995

Karen Phillips  
Complainant

VS.

Complaint Docket  
No: R-00943271C0088

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

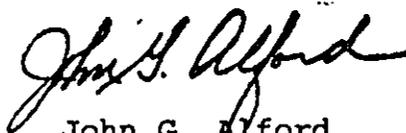
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

ORIGINAL



**Pennsylvania Power & Light Company**

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

KJR

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

FAX: 610/774-6726

March 20, 1995

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

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSIO:  
SECRETARY BUREAU

Re: **Karen Phillips v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0088**

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. Karen Phillips  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Karen Phillips

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0088

---

**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. Karen Phillips  
443 Fifth Street  
Whitehall, Pennsylvania 18052

Dated this 20th day of March, 1995.



---

Paul E. Russell



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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, not the 20.7% frequently cited.

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

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

Paul E. Russell  
Its Attorney

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

Dated: March 20, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0089  
110500

Please Print:

ORIGINAL

RECEIVED  
95 FEB 27 AM 11:05  
PA. P.U.C.  
INFO. CONT. DIV.

1. Your Name, Mailing Address and Telephone Number

Name Chris Charon  
Street/P.O. Box Box 283-B, Davis Rd Apt# \_\_\_\_\_  
City Honey Brook State Pa Zip 19344  
County Chester Home Telephone-Area Code (610) 273-9546  
Work Telephone-Area Code (610) 384-1517

2. Which company does your complaint concern?

Name of Company Pa. Power + Light

DOCKETED  
MAR 01 1995

3. What is your complaint?

DOCUMENT  
FOLDER

My complaint is the proposed 20%  
rate hike they want for residential  
customers. That is just too much. I can  
see a smaller rate hike. But the  
public is getting very frustrated at taxes,  
utilities etc going higher and higher each  
year. I am the mother of two children  
still at home. Widowed and on a fixed  
income the last 5 years it is very  
difficult to make ends meet. My income  
does not go up while everything else  
does. There has to be a stop to  
this craziness.

(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 the commission to try to help the consumer. If there has to be a hike why does the homeowner have to pay the highest part of it. Let businesses take the higher cost. They have more ways of budgeting for it. I am sure the govt helps in some way.

(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.

*Chris Chamon*

*2-19-95*

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

Date Signed

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 1, 1995

R-00943271C0089

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 Chris Charron. 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

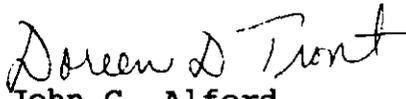
R-00943271C0089

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: March 1, 1995

Chris Charron  
Complainant

VS.

Pa Power & Light Co  
Respondent

**DOCKETED**  
MAR 01 1995

Complaint Docket  
No: R-00943271C0089

---

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

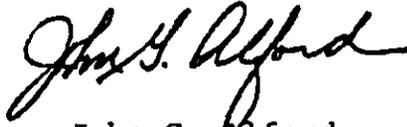
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

March 20, 1995

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

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSIO  
SECRETARY BUREAU

Re: **Chris Charron v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0089

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. Chris Charron  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Chris Charron

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0089

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

---

**CERTIFICATION OF SERVICE**

---

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

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

Ms. Chris Charron  
Box 283-B  
Davis Road  
Chester, Pennsylvania 19344

Dated this 20th day of March, 1995.

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



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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, not the 20.7% frequently cited.

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



---

Paul E. Russell  
Its Attorney

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

Dated: March 20, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0090  
110500

Please Print:

ORIGINAL

RECEIVED  
95 FEB 27 AM 11:53  
P. U. C. DIV.  
REGISTRATION CONTROL

1. Your Name, Mailing Address and Telephone Number

Name MR MELVIN E & PATRICIA M MILLER, JR  
Street/P.O. Box 11037 W. Linden St. Apt#             
City Allentown State PA Zip 18102  
County Lehigh Home Telephone-Area Code (      )  
Work Telephone-Area Code (610) 437-1983

Do not give out this number please!  
(Unlisted)

2. Which company does your complaint concern?

Name of Company Penna Power & Light Co.

DOCKETED  
MAR 01 1995

DOCUMENT  
FOLDER

3. What is your complaint?

The rate increase that the P.P.U.C. is asking for is absolutely outrageous! We are a one income family with two young adults, one at home and one in college. Our budget at this time is stretched to the limit. To have the proposed increase for 20% would put an even greater burden on all of us. We are supposedly middle class Americans who may not pay our taxes on time and all our other bills too, and have only one (1) major credit card with a small limit & credit line so we can control our spending more efficiently; how do we "the middle class" continue to go on doing this? The city of Allentown and the state of Pennsylvania is one of the highest taxed in the nation plus the number of senior citizens on fixed incomes is tremendous, how do they continue

(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?**

to do this then say be more for scale signs going up  
in the near future. Try but average budget of 357,000.00  
a year and still run a household and pay your taxes  
and bills on time. There is no way an increase of such  
magnitude can be justified, surely you can see this!  
We complain about the stamps going up 3¢ try a 20%  
increase in your electric bill and you'll be in for a  
real shock. If this is allowed to go unchecked how will  
we continue to keep going at this rate. The wealthy will  
get wealthier they pay only taxes and the middle class  
is supposed to bear them all. No, I'm afraid we've had  
enough, we cannot keep it up and keep it together,  
soon there will be two classes of citizens the wealthy and  
the poor and when will America be there? Do you know?

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

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

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

Patricia Mary Miller

2/24/95

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

Date Signed

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 1, 1995

R-00943271C0090

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

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A 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

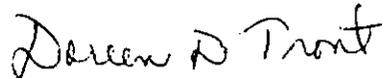
R-00943271C0090

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: March 1, 1995

DOCKETED  
MAR 01 1995

Melvin & Patricia Miller, Jr.  
Complainant

VS.

Complaint Docket  
No: R-00943271C0090

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

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

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

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

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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

ORIGINAL

March 20, 1995

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

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

**Re: Melvin and Patricia Miller, Jr. v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0090**

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: Melvin and Patricia Miller, Jr.  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Melvin and Patricia Miller, Jr.

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0090

---

**CERTIFICATION OF SERVICE**

---

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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

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

Melvin and Patricia Miller, Jr.  
1637 W. Linden Street  
Allentown, Pennsylvania 18102

Dated this 20th day of March, 1995.

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

JOCKETER

MAR 24 1995

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

Melvin and Patricia Miller, Jr.

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0090

RECEIVED

MAR 20 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 knowledge or information sufficient

to respond to Complainants' statements regarding their personal finances.

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

DOCUMENT  
FOLDER

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%, not the 20.7% frequently cited.

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

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

Paul E. Russell  
Its Attorney

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

Dated: March 20, 1995  
at Allentown, Pennsylvania



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

R-00943271C0001D  
110500

**ORIGINAL**

RECEIVED  
95 FEB 27 AM 11:53  
PA. P.U.C.  
INFO. CONTROL DIV.

Please Print:

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

Name TANET MILLER  
Street/P.O. Box 1713 S. Hall St. Apt# B-2  
City Allenstown State PA Zip 18103  
County Lehigh Home Telephone-Area Code (610) 797-2302  
Work Telephone-Area Code (610) 402-8843

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

Name of Company PP&L Company

**DOCKETED**

MAR 01 1995

**DOCUMENT  
FOLDER**

**3. What is your complaint?**

PP&L wants to raise our billing service for 20%

I'm sure this is their way of getting a smaller increase - by asking a high percentage of 20% they are probably hoping to get what they really want which is 10 or 15% increase.

Many people cannot pay their bills now - how can they pay an additional 20% increase. We do not get 20% increases in our paychecks - only 2-3% a year. It would take 7 years for our increases to match the 20% PP&L wants.

(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?

Not increase 20% rate hike

2 Generators were shut down + not even used because of the mild winter.

Other companies are buying electric from PPL now - are they increased?

What is the increase for - additional increases in PPL workers wages?

There have been layoffs because there is not enough work?

(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.

Joy Miller

2/23/95

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: March 1, 1995

R-00943271C0091

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

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A 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-00943271C0091

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: March 1, 1995

Janet Miller  
Complainant

VS.

Pa Power & Light Co  
Respondent

DOCKETED  
MAR 01 1995

Complaint Docket  
No: R-00943271C0091

---

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

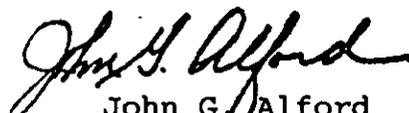
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

FAX: 610/774-6726

March 20, 1995

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

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSIO  
SECRETARY BUREAU

Re: **Janet Miller v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0091**

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

cc: Ms. Janet Miller  
The Honorable Michael C. Schnierle

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Janet Miller

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0091

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSIO  
SECRETARY BUREAU

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

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

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

Ms. Janet Miller  
1713 South Hall Street, B-2  
Allentown, Pennsylvania 18103

Dated this 20th day of March, 1995.



Paul E. Russell



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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, not the 20.7% frequently cited.

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

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

By way of further answer, the amount of the rate increase requested by PP&L in its December 30, 1994 filing is fully justified and fully supported by the data and information submitted with that filing.

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 20, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C00992  
110500

ORIGINAL

RECEIVED  
95 FEB 27 AM 11:51  
PA. P. U. C. CM.  
INFO. CONTROL CM.

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name Bronwen K. Zitrides  
Street/P.O. Box 1116 Meadowsbrook CW Apt#   
City Allentown State PA Zip 18103  
County Lehigh Home Telephone-Area Code (610) 437-2977  
Work Telephone-Area Code (610) 432-3318

2. Which company does your complaint concern?

Name of Company PP+L

DOCKETED  
MAR 01 1995

3. What is your complaint?

DOCUMENT

PP+L has requested a rate hike. The amount proposed for residential usage is outrageous! No entity can make such a dramatic financial increase. An organization like PP+L must be better able to plan its budget. The individual home owner cannot be held responsible. If increases are deemed necessary, they should be planned and implemented gradually, with the public having time to adjust.

Secondly, a disproportionate increase is being requested for residential usage. Commercial rates are to be increased at a much lower %.

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

This is unfair.

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

I believe PPU should be told to  
restructure its increase request so it  
becomes gradual and more equitable.

(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.

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

2/24/95  
Date Signed

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 1, 1995

R-00943271C0092

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 Bronwen K. Zitrides. 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

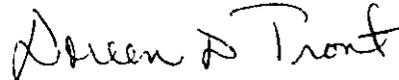
R-00943271C0092

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: March 1, 1995

DOCKETED  
MAR 01 1995

Bronwen K. Zitrides  
Complainant

VS.

Complaint Docket  
No: R-00943271C0092

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

March 20, 1995

ORIGINAL

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

RECEIVED

MAR 20 1995

**Re: Bronwen K. Zitrides v. PUBLIC UTILITY COMMISSIO:**  
**Pennsylvania Power & Light Company SECRETARY BUREAU**  
**Docket No. R-00943271C0092**

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. Bronwen K. Zitrides  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Bronwen K. Zitrides

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0092

RECEIVED

MAR 20 1995

CERTIFICATION OF SERVICE

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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

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

Ms. Bronwen K. Zitrides  
1116 Meadowbrook CW  
Allentown, Pennsylvania 18103

Dated this 20th day of March, 1995.

  
Paul E. Russell



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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, not the 20.7% frequently cited.

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 20, 1995  
at Allentown, Pennsylvania



**FORMAL COMPLAINT FORM**  
**Pennsylvania Public Utility Commission**  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

R-00943271C0093  
110500

KJR

Please Print:

FEB 28 1995

**ORIGINAL**

1. Your Name, Mailing Address and Telephone Number BUREAU OF CONSUMER SERVICES  
DIVISION OF FIELD SERVICES

Name Michelle Scott  
Street/P.O. Box 36 N 20<sup>th</sup> St Apt#   
City Mustang State PA Zip 17183  
County  Home Telephone-Area Code ( )   
Work Telephone-Area Code ( )

RECEIVED  
95 FEB 28 PM 3:02  
PA. P. U. C.  
INF. D. CONTROL DIV.

2. Which company does your complaint concern?

Name of Company P&E

3. What is your complaint?

I do not want my bid to go up because it  
is due to pay for the rent I have already

**DOCKETED**

MAR 01 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?

*Please make sure my bill do not grow!*

(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 Scott*

*2.28.95*

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

KJR

DATE SERVED: March 1, 1995

R-00943271C0093

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 Michelle Scott. 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-00943271C0093

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,

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

for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 1, 1995

DOCKETED  
MAR 01 1995

Michelle Scott  
Complainant

VS.

Complaint Docket  
No: R-00943271C0093

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

KJR

FAX: 610/774-6726

March 20, 1995

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

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSIO.  
SECRETARY BUREAU!

Re: **Michelle Scott v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0093**

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. Michelle Scott  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER





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%, not the 20.7% frequently cited.

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



---

Paul E. Russell  
Its Attorney

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

Dated: March 20, 1995  
at Allentown, Pennsylvania



KOHN, NAST & GRAF, P.C.

1101 MARKET STREET, SUITE 2400  
PHILADELPHIA, PENNSYLVANIA 19107-2924

(215) 238-1700

TELECOPIER (215) 238-1968

HAROLD E. KOHN  
DAVID H. WEINSTEIN  
ROBERT A. SWIFT  
WAYNE M. THOMAS  
DIANNE M. NAST  
ELKAN M. KATZ  
ROBERT J. LAROCCA  
JOSEPH C. KOHN  
JEANNE P. WROBLESKI  
JOANNE ZACK  
STEVEN A. ASHER  
DENIS F. SHEILS  
ROBERT S. KITCHENOFF  
GEORGE W. CRONER

DOCUMENT  
FOLDER  
KJR

DOUGLAS A. ABRAHAMS  
WILLIAM E. HOESE  
MARTIN J. D'URSO  
LINDSEY B. SLAUGHTER  
DEBORAH A. SOTTOSANTI  
STEVEN M. STEINGARD  
ROBERT D. GREENBAUM  
SENA S. GALEN  
SETH I. GROSSMAN  
MYLES H. MALMAN  
DIANA LIBERTO  
ROBIN SHELDON  
MICHAEL J. BONI  
CRAIG W. HILLWIG

February 27, 1995

BY FEDERAL EXPRESS

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

Re: PUC v. PP&L, Docket No. R-00943271

C0094

RECEIVED

FEB 27 1995

SECRETARY'S OFFICE  
Public Utility Commission

Dear Secretary Alford:

Enclosed for filing in the captioned matter is the Complaint of the Central Eastern Pennsylvania Fuel Oil Dealers. Such Complaint pertains to Respondent's Supplement No. 50 to Electric Tariff Pa. PUC No. 200.

Kindly provide me with a copy of any orders which have been issued or the service list which has been prepared for these proceedings. Would you also return a time-stamped copy of enclosed Complaint in the envelope provided.

Very truly yours,

*Wayne M. Thomas*  
Wayne M. Thomas

DO NOT  
MAR 2 1995

WMT/tjh  
Enclosures

PENNSYLVANIA PUBLIC UTILITY COMMISSION

CENTRAL EASTERN PENNSYLVANIA  
FUEL OIL DEALERS, Consisting of:

YEAGER'S FUEL, INC.,  
1431 Green Street  
Allentown, PA 18102;

B&D FUEL OIL COMPANY  
52 Magna Drive  
Coplay, PA 18037;

DRIES AND REICHARD COAL YARD  
775 Furnace  
Emmaus, PA 18049;

FLORES AIR CONDITIONING, INC.  
259 Race Street  
Catasauqua, PA 18032;

FREY'S FUEL OIL SERVICE  
1433 Lehigh Street  
Allentown, PA 18103;

FRITCH FUEL COMPANY  
116 River Street  
Bethlehem, PA 18015;

HARHARTS SERVICE STATION, INC.  
21st & Main Streets  
Northampton, PA 18067;

HARNED DURHAM OIL CO.  
4893 Buckeye Road  
Emmaus, PA 18049;

R. P. HUTCHINSON, INC.  
33 South Lea Street  
Macungie, PA 18062;

KELLER COAL & OIL CO.  
507-11 Washington Avenue  
Northampton, PA 18067;

GEORGE A. KOHLER & BROTHER  
4136 South Church Street  
Egypt, PA 18052;

(Cont'd.)

RECEIVED

FEB 27 1995

SECRET  
PUBLIC UTILITY COMMISSION

DOCKET NO. R-00943271

C0094

COMPLAINT

C. A. LESSIG, INC. :  
P.O. Box 158 :  
Wind Gap, PA 18091; :  
  
LOIKITS OIL & HEATING :  
4401 Spruce :  
Whitehall, PA 18052; :  
  
CHARLES H. MANTZ :  
65 2nd Street :  
Slatington, PA 18080; :  
  
R. L. MUTH PLUMBING & HEATING :  
4806 Blue Church Road :  
Coopersburg, PA 18036; :  
  
PATTERSON PETROLEUM :  
2432 South Law Street :  
Allentown, PA 18103; :  
  
REMAYLY FUEL, INC. :  
6751 PA Route 873 :  
Slatington, PA 18080; :  
  
SZILAGYI FUEL CO., INC. :  
1414 East 4th Street :  
Bethlehem, PA 18015; :  
  
THE OIL MAN :  
518 Main Street :  
Hellertown, PA 18055; :  
  
MORRIS E. WISSER :  
1829 Pope Road :  
Allentown, PA 18104; :  
  
LAMAR E. WOLFGANG, INC. :  
1635 Main :  
Orefield, PA 18069; :  
  
WHITLOCK & WOERTH, INC. :  
1220 Georgetown Road :  
Christiana, PA 17509; :  
  
ZONGORA FUEL, INC. :  
1545 East Susquehanna Street :  
Allentown, PA 18103; :  
  
DEITER BROTHERS FUEL COMPANY, INC. :  
1226 Stefko Boulevard :  
Bethlehem, PA 18017; :

DOCKET NO. R-00943271  
(Cont'd.)

(Cont'd.)

PIPELINE PETROLEUM, INC. :  
P.O. Box 159 :  
Macungie, PA 18062; :  
: :  
MANSFIELD FUEL OIL COMPANY :  
1640 Clauser Street :  
Hellerton, PA 18055; :  
: :  
SCHWANGER BROTHERS & COMPANY, INC. :  
P.O. Box 4186 :  
Lancaster, PA 17604; :  
: :  
SICO COMPANY :  
P.O. Box 27 :  
Mount Joy, PA 17552; :  
: :  
SENICK, INC. :  
1603 Freemansburg Road :  
Bethlehem, PA 18017; :  
: :  
CARLOS R. LEFFLER, INC. :  
P.O. Box 278 :  
Richland, PA 17087-0278; :  
: :  
H. JOHN DAVIS, INC. :  
P.O. Box 68 :  
Mount Pocono, PA 18344; :  
: :  
ARTHUR J. ULRICH, INC. :  
139 Main Street :  
Landisville, PA 17538; :  
: :  
UNION FUEL COMPANY :  
710 Bushkill Drive :  
Easton, PA 18042; :  
: :  
GUY HEAVENER, INC. :  
480 School Lane :  
Harleysville, PA 19438; :  
: :  
W. C. REICHENBACH & SON, INC. :  
P.O. Box 869 :  
Allentown, PA 18105; :  
: :  
APGAR OIL COMPANY, INC. :  
639 East Congress Street :  
Allentown, PA 18103-1299; and :  
:

DOCKET NO. R-00943271  
(Cont'd.)

(Cont'd.)

FREYMAN'S FUEL OIL COMPANY, INC. :  
826 Hanover Avenue :  
Allentown, PA 18103; :  
:   
Complainants, :  
:   
v. :  
:   
PENNSYLVANIA POWER & LIGHT CO., :  
:   
Respondent. :  
:

---

COMPLAINT

1. The Central Eastern Pennsylvania Fuel Oil Dealers ("CEPFOD") is a coalition of businesses consisting of YEAGER'S FUEL, INC., 1431 Green Street, Allentown, PA 18102; B&D FUEL OIL COMPANY, 52 Magna Drive, Coplay, PA 18037; DRIES AND REICHARD COAL YARD, 775 Furnace, Emmaus, PA 18049; FLORES AIR CONDITIONING, INC., 259 Race Street, Catasauqua, PA 18032; FREY'S FUEL OIL SERVICE, 1433 Lehigh Street, Allentown, PA 18103; FRITCH FUEL COMPANY, 116 River Street, Bethlehem, PA 18015; HARHARTS SERVICE STATION, INC., 21st & Main Streets, Northampton, PA 18067; HARNED DURHAM OIL CO., 4893 Buckeye Road, Emmaus, PA 18049; R. P. HUTCHINSON, INC., 33 South Lea Street, Macungie, PA 18062; KELLER COAL & OIL CO., 507-11 Washington Avenue, Northampton, PA 18067; GEORGE A. KOHLER & BROTHER, 4136 South Church Street, Egypt, PA 18052; C. A. LESSIG, INC., P.O. Box 158, Wind Gap, PA 18091; LOIKITS OIL & HEATING, 4401 Spruce, Whitehall, PA 18052; CHARLES H. MANTZ, 65 2nd Street, Slatington, PA 18080; R. L. MUTH PLUMBING & HEATING, 4806 Blue Church Road, Coopersburg, PA 18036; PATTERSON PETROLEUM, 2432 South Law Street, Allentown, PA 18103; REMALY FUEL, INC., 6751 PA Route 873, Slatington, PA 18080; SZILAGYI

FUEL CO., INC., 1414 East 4th Street, Bethlehem, PA 18015; THE OIL MAN, 518 Main Street, Hellertown, PA 18055; MORRIS E. WISSER, 1829 Pope Road, Allentown, PA 18104; LAMAR E. WOLFGANG, INC., 1635 Main, Orefield, PA 18069; WHITLOCK & WOERTH, INC., 1220 Georgetown Road, Christiana, PA 17509; ZONGORA FUEL, INC., 1545 East Susquehanna Street, Allentown, PA 18103; DEITER BROTHERS FUEL COMPANY, INC., 1226 Stefko Boulevard, Bethlehem, PA 18017; PIPELINE PETROLEUM, INC., P.O. Box 159, Macungie, PA 18062; MANSFIELD FUEL OIL COMPANY, 1640 Clauser Street, Hellerton, PA 18055; SCHWANGER BROTHERS & COMPANY, INC., P.O. Box 4186, Lancaster, PA 17604; SICO COMPANY, P.O. Box 27, Mount Joy, PA 17552; SENICK, INC., 1603 Freemansburg Road, Bethlehem, PA 18017; CARLOS R. LEFFLER, INC., P.O. Box 278, Richland, PA 17087-0278; H. JOHN DAVIS, INC., P.O. Box 68, Mount Pocono, PA 18344; ARTHUR J. ULRICH, INC., 139 Main Street, Landisville, PA 17538; UNION FUEL COMPANY, 710 Bushkill Drive, Easton, PA 18042; GUY HEAVENER, INC., 480 School Lane, Harleysville, PA 19438; W. C. REICHENBACH & SON, INC., P.O. Box 869, Allentown, PA 18105; APGAR OIL COMPANY, INC., 639 East Congress Street, Allentown, PA 18103-1299; and FREYMAN'S FUEL OIL COMPANY, INC., 826 Hanover Avenue, Allentown, PA 18103, which oppose certain portions of Respondent Pennsylvania Power & Light Company's ("PP&L") Supplement No. 50 to Tariff Electric - PA PUC No. 200 ("Rate Tariff").

2. Each member of CEPFOD is a business entity within PP&L's jurisdictional territory which purchases electric power from PP&L and is subject to PP&L's Rate Tariffs as amended. Each

member is also a competitor with PP&L in the sale of heating fuel to residential customers within PP&L's territory.

3. PP&L's Rate Tariff provides for an RTS rate for certain ratepayers which fails to comply with the statutes of the Commonwealth and the regulations and orders of the Commission in that:

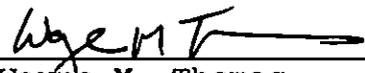
(a) it provides unjustified and unnecessary subsidies to one class of customers at the expense of other classes, including Complainants;

(b) it serves to shift load from Respondent's existing peak period so as to create another peak; consequently, it does not further PP&L's demand-side management objectives, thereby making such a rate unnecessary; and

(c) it has been established at a level which gives Respondent an unfair competitive advantage in pricing electric heating fuel against competing fossil fuels.

WHEREFORE, Complainants request that the RTS rate be eliminated from the Supplement to Tariff No. 50. In the alternative, the RTS rate should be proportionally increased in comparison to other rates or the RTS rate should be limited to existing customers and not offered to customers after the Supplement is effective.

Dated: February 27, 1995

  
Wayne M. Thomas  
KOHN, NAST & GRAF, P.C.  
1101 Market Street, 24th Floor  
Philadelphia, PA 19107  
(215) 238-1700

and

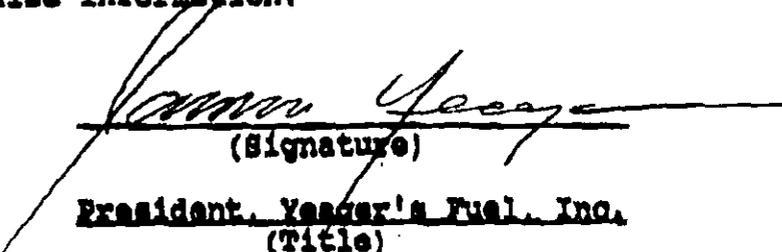
David L. Pennington  
Catherine Panchou Cox  
HARVEY, PENNINGTON, HERTING  
& RENNEISEN, LTD.  
Eleven Penn Center  
1835 Market Street, 29th Floor  
Philadelphia, PA 19103  
(215) 563-4470

Attorneys for Complainants

**CERTIFICATION**

- James Yeager hereby certifies that he is President of Yeager's Fuel, Inc., one of the Complainants in the within action. The information placed on this form is true and correct to the best of his knowledge, information and belief. He understands that he could be punished under Pennsylvania state law if he purposely provides false information.

Dated: February 27, 1995

  
(Signature)

President, Yeager's Fuel, Inc.  
(Title)



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

KJR

DOCUMENT  
FOLDER

IN REPLY PLEASE  
REFER TO OUR FILE

March 2, 1995

R-943271C0094

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

A Complaint has been filed against you before the Pennsylvania Public Utility Commission by **CENTRAL EASTERN PENNSYLVANIA FUEL OIL DEALERS**. 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  
March 2, 1995

---

DOCUMENT  
FOLDER

**CENTRAL EASTERN PENNSYLVANIA FUEL OIL DEALERS**

---

Complaint Docket  
No. R-943271C0094

v.

**PENNSYLVANIA POWER & LIGHT**

---

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

MAR 2 1995

TO: **PENNSYLVANIA POWER & LIGHT**

TAKE NOTICE:

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

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

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

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

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

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

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

John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

ORIGINAL

March 20, 1995

RECEIVED

MAR 20 1995

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

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

**Re: Central Eastern Pennsylvania Fuel Oil Dealers  
v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0094**

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: Wayne M. Thomas, Esquire  
The Honorable Michael C. Schnierle

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Central Eastern Pennsylvania Fuel  
Oil Dealers

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0094

RECEIVED

MAR 20 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

---

**CERTIFICATION OF SERVICE**

---

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

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

Wayne M. Thomas, Esquire  
Kohn, Nast & Graf, P.C.  
1101 Market Street, Suite 2400  
Philadelphia, Pennsylvania 19107-2924

Dated this 20th day of March, 1995.

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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Central Eastern Pennsylvania Fuel  
Oil Dealers

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0094

MAR 24 1995

ORIGINAL  
DOCKETED

RECEIVED

MAR 20 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. Denied. PP&L does not have knowledge or information sufficient to respond to allegations regarding the membership of the Central Eastern Pennsylvania Fuel Oil Dealers (CEDFOD). Therefore, this allegation is denied.

2. Admitted in part, denied in part. It is admitted that each member of CEDFOD listed in paragraph 1, above, is a customer of PP&L. The Company does not have knowledge or information sufficient to respond to Complainant's allegations regarding each member company's status as "a competitor with PP&L in the sale of heating fuel to residential customers within PP&L's territory."

DOCUMENT  
FOLDER

3. Denied. Rate RTS is in full compliance with all applicable provisions of the Public Utility Code, 66 Pa.C.S. § 101, et seq., and all applicable regulations and orders of the Public Utility Commission. By way of further answer, the level of Rate RTS is appropriate and fully justified by the Company's cost allocation data and other data submitted in the Company's December 30, 1994 filing.

(a) Denied. By way of further answer, Rate RTS does not create "unjustified and unnecessary" cross-class subsidies.

(b) Denied. By way of further answer, Rate RTS has not created a system peak. Moreover, Rate RTS continues to support the Company's demand-side management objectives.

(c) Denied. By way of further answer, Rate RTS does not give PP&L an "unfair competitive advantage" in pricing electric heating service.

4. The WHEREFORE 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: March 20, 1995  
at Allentown, Pennsylvania

