

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

ORIGINAL

R-9432710095

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

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name DENISE TUCKER

Street/P.O. Box 1071 LAKEWOOD DR. Apt#

City QUAKERTOWN State PA Zip 18951

County BUCKS Home Telephone-Area Code (610) 346-7761

Work Telephone-Area Code (610) 867-5023

2. Which company does your complaint concern?

Name of Company PP+L

3. What is your complaint?

22% PROPOSED RATE INCREASE

DOCKETED

MAR 2 1995

DOCUMENT
FOLDER

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

20

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

I WANT THE PUC TO DENY 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.

Denise Tucker

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
PO BOX 3265, HARRISBURG, PA 17105-3265
March 2, 1995

R-943271C0095

ANTHONY C. DECUSATIS, ATTORNEY
MORGAN LEWIS & BOCKIUS
2000 ONE LOGAN SQUARE
PHILADELPHIA PA 19103

Dear Sir:

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

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

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

Very truly yours,

for John G. Alford, Secretary

fao
Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
March 1, 1995

DENISE TUCKER

Complaint Docket
No. R-943271C0095

v.

PENNSYLVANIA POWER & LIGHT COMPANY

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: PENNSYLVANIA POWER & LIGHT COMPANY

TAKE NOTICE:

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

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

DOCUMENT
FOLDER

DOCKETED

MAR 2 1995

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

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

FAX: 610/774-6726

ORIGINAL

March 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: Denise Tucker v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0095**

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. Denise Tucker
The Honorable Michael C. Schnierle

DOCUMENT
FOLDER

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Denise Tucker

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0095

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. Denise Tucker
1071 Lakewood Drive
Quakertown, Pennsylvania 18951

Dated this 20th day of March, 1995.



Paul E. Russell

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED

MAR 24 1995

Denise Tucker

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0095

RECEIVED

ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY

MAR 20 1995

PUBLIC UTILITY COMMISSIO.
SECRETARY BUREAU

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

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

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

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

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

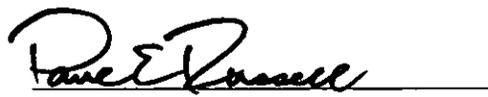
4. This paragraph constitutes a prayer for relief to which no answer is required.

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

ORIGINAL ORIGINAL

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION, ET AL.

DOCKET NO. R-00943271C0096

v.

PENNSYLVANIA POWER & LIGHT COMPANY

RECEIVED

FEB 28 1995

PUBLIC UTILITY COMMISSION SECRETARY BUREAU

COMPLAINT OF THE LANCASTER CHAMBER OF COMMERCE AND INDUSTRY DOCKETED

1. The Complainant is The Lancaster Chamber of Commerce and Industry. address is 100 South Queen Street, Lancaster, Pennsylvania.

2. The attorney for Complainant is Christopher S. Underhill, Hartman Underhill & Brubaker, 221 East Chestnut Street, Lancaster, Pennsylvania.

3. Respondent is Pennsylvania Power & Light Company. Its address is Two North Ninth Street, Allentown, Pennsylvania.

4. Complainant is a Pennsylvania nonprofit corporation made up of businesses and industries in Lancaster County and whose interests the Complainant represents in matters of general public interest.

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

DOCUMENT FOLDER

6. Prior complaints to this increase in base rate revenues have been filed by the PP&L Industrial Customer Alliance, the Office of Consumer Advocate, the Office of Small Business Advocate, and the U.S. Department of Defense. Bethlehem Steel Corporation has filed a Petition to Intervene. Other objections in the form of letters or telephone calls have also been submitted to the Commission.

7. On January 26, 1995, the Commission instituted an investigation into PP&L's proposed rate increase and suspended Supplement No. 50 for a period of not more than seven months from February 28, 1995.

8. Some or all of the members of Complainant receive electric service from PP&L. The cost of electric service is an important part of such members' costs of doing business.

9. The Complainant files this formal Complaint on behalf of its members because the proposed rate increase will harm each of them individually and collectively will have a significant adverse impact on the business climate and economic development in Lancaster County.

10. On behalf of its members, the Complainant alleges that the proposed rate increase is not just, reasonable, and nondiscriminatory as required by Sections 1301 and 1304 of the Public Utility Code.

11. The Complainant incorporates by reference paragraph 9(a-n) of the Amended Complaint of the PP&L Industrial Customer Alliance.

12. The relief sought by the Complainant is that (a) it be allowed to participate as a party in this proceeding, and (b) that hearings be held at which PP&L be required to demonstrate that its proposed rate increase are just, reasonable, and nondiscriminatory as required by law.

HARTMAN UNDERHILL & BRUBAKER

By: 

Christopher S. Underhill

Attorney I.D. #07013

Attorneys for Complainant, The

Lancaster Chamber of Commerce and Industry

221 East Chestnut Street

Lancaster, PA 17602

(717) 299-7254

VERIFICATION

I hereby verify that I am President of The Lancaster Chamber Commerce and Industry; that as such I am authorized to make this verification; and that the information set forth in the foregoing Complaint is true and correct to the best of my knowledge, information and belief. I understand that any false statements contained herein are subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

Dated: February 23, 1995.



Daniel C. Witmer

HARTMAN UNDERHILL & BRUBAKER

ATTORNEYS AT LAW

221 EAST CHESTNUT STREET

LANCASTER, PENNSYLVANIA 17602-2782

(717) 299-7254

COUNSEL

JOHN I. HARTMAN, JR.

THEODORE L. BRUBAKER

JOSEPH A. BROWN

FAX (717) 299-3160

ALVIN B. LEWIS, JR.
CHRISTOPHER S. UNDERHILL
GEORGE T. BRUBAKER
ANDREW F. LUCARELLI
HARRY ST. C. GARMAN
WILLIAM C. McCARTY
ALEXANDER HENDERSON, III
ROBERT M. FRANKHOUSER, JR.
THOMAS W. BERGEN
MICHAEL W. BABIC
MARK STANLEY
MARK E. LOVETT
SUSAN M. KADEL
KEVIN M. FRENCH
STEPHEN R. LAZUN
JOSHUA D. COHEN
BRIAN S. BLACK

SPECIAL COUNSEL
MADELYN P. NIX

February 27, 1995

KJR

VIA UPS

Secretary
Pennsylvania Public Utility Commission
Post Office Box 3265
North Office Building
Harrisburg, PA 17120

In re: Pennsylvania Public Utility Commission, et al. v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0096

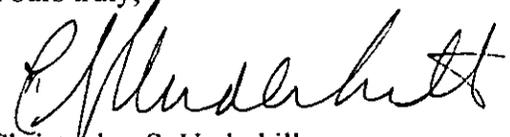
RECEIVED
FEB 28 1995
PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

Dear Sir:

I enclose herewith an original and two copies of a Notice of Appearance and the Complaint of The Lancaster Chamber of Commerce and Industry for filing in the above-captioned matter.

Please date stamp the copy of this letter and return it to me in the enclosed envelope as an indication that you have received these documents.

Yours truly,


Christopher S. Underhill

CSU:gp
enclosures
0014424.01

cc w/enc: David M. Kleppinger, Esquire
Mr. Daniel C. Witmer

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FOLDER

ORIGINAL

ORIGINAL

COMMONWEALTH OF PENNSYLVANIA
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:

PENNSYLVANIA PUBLIC UTILITY
COMMISSION, ET AL.

v.

PENNSYLVANIA POWER & LIGHT
COMPANY

DOCKET NO. R-00943271 *C0096*

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FEB 23 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

NOTICE OF APPEARANCE

Please enter my appearance in the above-designated matter on behalf of The Lancaster Chamber of Commerce and Industry.

I am authorized to accept service on behalf of said participant in this matter.

On the basis of this notice, I request a copy of each document hereafter issued by the Commission in this matter.

DOCKETED
MAR 2 1995

HARTMAN UNDERHILL & BRUBAKER

By: *C Underhill*

Christopher S. Underhill
Attorney I.D. #07013

Attorneys for The Lancaster Chamber of
Commerce and Industry

DOCUMENT
FOLDER

221 East Chestnut Street
Lancaster, PA 17602
(717) 299-7254

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PO BOX 3265, HARRISBURG, PA 17105-3265
March 2, 1995

KJR

R-943271C0096

ANTHONY C. DECUSATIS, ATTORNEY
MORGAN LEWIS & BOCKIUS
2000 ONE LOGAN SQUARE
PHILADELPHIA PA 19103

Dear Sir:

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

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CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

Very truly yours,

for John G. Alford, Secretary

fao
Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
March 1, 1995

THE LANCASTER CHAMBER OF COMMERCE AND INDUSTRY

Complaint Docket
No. R-943271C0096

v.

PENNSYLVANIA POWER & LIGHT COMPANY

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: PENNSYLVANIA POWER & LIGHT COMPANY

TAKE NOTICE:

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

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

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MAR 2 1995
FOLDER

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

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

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

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

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

John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

ORIGINAL

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

FAX: 610/774-6726

March 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: The Lancaster Chamber of Commerce
and Industry v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0096**

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: Christopher S. Underhill, Esquire
The Honorable Michael C. Schnierle

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FOLDER

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

The Lancaster Chamber of Commerce
and Industry

Complaint Docket
No. R-00943271C0096

v.

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

Christopher S. Underhill, Esquire
221 East Chestnut Street
Lancaster, Pennsylvania 17602

Dated this 20th day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

The Lancaster Chamber of Commerce
and Industry

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0096

DOCKETED

MAR 24 1995

RECEIVED

MAR 20 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

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

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

respond to statements regarding the nature of the Lancaster Chamber of Commerce and Industry.

5. Admitted.

DOCUMENT
OLDER

6. Admitted in part, denied in part. It is admitted that the formal complaints and petitions cited in this paragraph have been filed. PP&L is without knowledge or information sufficient to respond to Complainant's statements regarding "other objections." Accordingly, these allegations are denied.

By way of further answer, PP&L has filed a timely answer to each of the complaints cited in this paragraph and, in its answer, has requested that these complaints be dismissed by the Commission.

7. Admitted.

8. Denied, PP&L is without knowledge or information sufficient to respond to statements regarding the nature of business activities of the members of Complainant.

9. Denied. PP&L is without knowledge or information sufficient to respond to Complainant's statements regarding the impact of the proposed rate increase upon its members and upon Lancaster County.

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

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

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

11. Denied. PP&L incorporates by reference its answer to paragraph 9(a-n) of the Amended Complaint of the PP&L Industrial Customer Alliance.

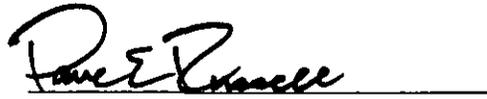
12. This paragraph constitutes a prayer for relief to which no answer is required.

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

A handwritten signature in black ink, appearing to read "Paul E. Russell", 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-00943271C0097
110500

RECEIVED
95 MAR 1 AM 9:03
PA. P. U. C. DIV.
INFO. CONTROL DIV.

Please Print:

ORIGINAL

1. Your Name, Mailing Address and Telephone Number

Name JOHN DITCHKUS SR
Street/P.O. Box 1302 BLUCHER AVE Apt# _____
City SCRANTON State PA Zip 18505
County LACKAWANNA Home Telephone-Area Code (717) 347-1763
Work Telephone-Area Code () _____

2. Which company does your complaint concern?

Name of Company P.P. & L

3. What is your complaint?

WHY AM I BEING PENALIZED FOR ^{20.7%}
USING LESS THAN 1,500 KW HRS (PER YEAR)

DOCKETED
MAR 02 1995

DOCUMENT
FOLDER

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

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

DENY THIS RATE INCREASE

LIST ALL MONEY P.P.L EMPLOYEES AND STOCKHOLDERS HAVE DONATED TO ALL PAC'S AND ELECTIONS.

DEDUCT THIS MONEY FROM ANY RATE INCREASE.

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

5. You must sign and date your complaint.

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

John D. Tokher

2-25-1995

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

Date Signed

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

DATE SERVED: March 3, 1995

R-00943271C0097

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

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

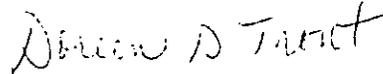
DOCUMENT
FOLDER

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 3, 1995

John Ditchkus, Sr
Complainant

VS.

Pa Power & Light Co
Respondent

Complaint Docket
No: R-00943271C0097

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY MAR 02 1995

ROCKETED

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

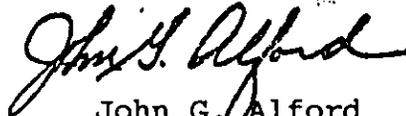
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

KJR

ORIGINAL

March 22, 1995



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

**SECRETARY'S OFFICE
Public Utility Commission**

Re: **John Ditchkus, Sr. v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0097**

**DOCUMENT
FOLDER**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. John Ditchkus, Sr.
The Honorable Robert A. Christianson

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

John Ditchkus, Sr.

v.

Pennsylvania Power & Light
Company

DOCUMENT
FOLDER

Complaint Docket
No. R-00943271C0097

DOCKETED
MAR 27 1995

ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY

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

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

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, 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, it is denied that residential customers using less electricity are penalized by the proposed rate increase. Although the percentage increase for higher residential usage levels generally is less than the per-

centage increase for lower residential usage levels, the absolute amount of the increase generally is larger.

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 22, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0098
110500

Please Print:

ORIGINAL

RECEIVED
95 MAR 1 AM 9:28
INFO. CONT. DIV.
PA. PUBLIC UTIL. COM.

1. Your Name, Mailing Address and Telephone Number

Name Peter Dodge
Street/P.O. Box 255 Washington St. Apt# Apt 1
City East Stroudsburg State PA Zip 18301
County Monroe Home Telephone-Area Code (717) 420 8091
Work Telephone-Area Code ()

2. Which company does your complaint concern?

Name of Company PP & L

3. What is your complaint?

The residential rate increase of 20.7
percent is disproportionate to the 2.4 percent
commercially ~~rate~~ and 9.1% Industrial rate
increase.

For the service they provide, they cannot
possibly quantify such reasons to justify
such an exorbitant rate increase.

INDEXED
MAR 02 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?

Have PPL attempt to quantify their reasons, balanced by the fact that they cannot be allowed to get away with such robbery. Just because they monopolize their service, that is why, in fact the Public Utility Commission was created in the first place.

(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.

Peter Dodge

2/27/95

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 3, 1995

R-00943271C0098

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 Peter Dodge. 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,

Darwin R. Tract
for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 3, 1995

Peter Dodge
Complainant

VS.

Complaint Docket
No: R-00943271C0098

Pa Power & Light Co
Respondent

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
MAR 02 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT
FOLDER

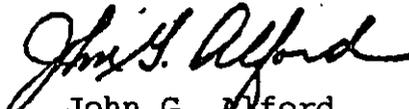
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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


John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

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

FAX: 610/774-6726

KJR

ORIGINAL

March 22, 1995

RECEIVED
MAR 22 1995

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

SECRETARY'S OFFICE
Public Utility Commission

Re: **Peter Dodge v.**
Pennsylvania Power & Light Company
Docket No. R-00943271C0098

DOCUMENT
03/22/95

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. Peter Dodge
The Honorable Robert A. Christianson

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Peter Dodge

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0098

DOCKETED
MAR 27 1995

**DOCUMENT
FOLDER**

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, 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 22, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0099

110500

RECEIVED
95 MAR 1 AM 9:28
PA. P.U.C.
INFO. CONTROL DIV.

KJR

Please Print:

ORIGINAL

1. Your Name, Mailing Address and Telephone Number

Name Joan Graham

Street/P.O. Box 4853 S. Hedgerow Drive Apt#

City Allentown State PA Zip 18103

County Lehigh Home Telephone-Area Code (610) 398-8715

Work Telephone-Area Code ()

2. Which company does your complaint concern?

Name of Company PP&L

DOCKETED
MAR 02 1995
DOCUMENT
FOLDER

3. What is your complaint?

PP & L's proposed rate increase. This large
rate hike is unfair to its customers. Not only would
the residential customer have to pay this outrageous
increase (20%) BUT, also, most assuredly, the businesses,
schools and government will also pass on their increased
energy costs onto the consumer. In the past 5 years, our
personal earnings have increased at a much slower growth!!

We keep our thermostat set at 67° during winter months
and I dress in layers (usually 3) as well as my children. However,
my electric bills are not cheap!

(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?

And what is PPL's justification for this outrageous rate hike ::

In part to pay for the cost of cutting its payroll! They must be joking. Any other business who acted in the same manner

would be out of business by now; - What normal consumer would pay 18-20% more for a product?

PPL needs to take a closer look at their Personnel Policies and their overall operating costs including salaries & retirement programs.

Will they be spending millions of dollars again in the near future to retire additional employees and then turn around & raise our rates again?? Does this ever end?

There are already enough charges -- customer charge, energy charge, sales tax.
(If you need more space use additional paper and attach to this form)

5. You must sign and date your complaint.

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

Jan K Graham

2/25/95

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

DATE SERVED: March 3, 1995

R-00943271C0099

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 Joan Graham. 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.

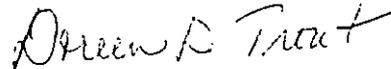
DOCUMENT
FOLDER

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 3, 1995

Joan Graham
Complainant

VS.

Complaint Docket
No: R-00943271C0099

Pa Power & Light Co
Respondent

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
MAR 02 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT
FOLDER

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

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

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

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

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


John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

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

FAX: 610/774-6726

ORIGINAL

KJR

**DOCUMENT
FILED**

March 22, 1995

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

RECEIVED
MAR 22 1995

**SECRETARY'S OFFICE
Public Utility Commission**

Re: **Joan Graham v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0099**

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. Joan Graham
The Honorable Robert A. Christianson

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joan Graham

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0099

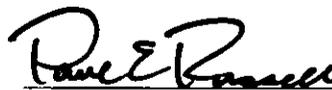
CERTIFICATION OF SERVICE

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 Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Ms. Joan Graham
4853 S. Hedgerow Drive
Allentown, Pennsylvania 18103

Dated this 22nd day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCUMENT
FOLDER

Joan Graham

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0099

DOCKETED
MAR 27 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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

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

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, 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, PP&L has undertaken many initiatives to control its costs, including administrative costs. Those initiatives have helped the

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

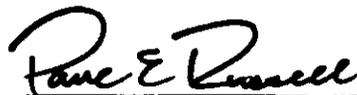
4. This paragraph constitutes a prayer for relief to which no answer is required.

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:



Paul E. Russell
Its Attorney

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

Dated: March 22, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM

Pennsylvania Public Utility Commission

R-00943271C0100

110500

Please Print:

ORIGINAL

RECEIVED
95 MAR 1 AM 9:11
INFO. CONTROL DIV.
PA. P. U. C.

1. Your Name, Mailing Address and Telephone Number

Name FRED MONTGOMERY
Street/P.O. Box 2101 S. LUMBER STREET Apt# 1
City ALLENTOWN State PENNA Zip 18103-5722
County LEHIGH Home Telephone-Area Code (610) 791-5951
Work Telephone-Area Code (610) 437-9200

DOCKETED
MAR 02 1995

DOCUMENT
FOLDER

2. Which company does your complaint concern?

Name of Company PENNSYLVANIA POWER AND LIGHT COMPANY

3. What is your complaint?

THIS PROPOSAL OF THIS COMPANY SEEMS MORE LIKE A MANDATE (SURE THING, ORDER EXECUTION TAKEN FOR GRANTED THAT IT WILL BECOME REALITY) RATHER THAN A FORMAL REQUEST FOR INCREASE FOR SERVICE. I CANNOT HANDLE SUCH AN INCREASE. BECAUSE OF MY OWN (FINANCIAL) BURDENS I WAS FORCED ONTO A BUDGET PROGRAM BY THE COMPANY (I'M GRATEFUL), DUE TO UNEXPECTED HARD WEATHER DEVELOPMENTS. I'M IN AN AWESOME FINANCIAL PREDICAMENT. I NOW SEEK WAYS TO USE ELECTRICITY MORE EFFICIENTLY IN MY HOUSEHOLD. I'M USING COUPON FOR EVERYTHING I CAN USE, ALSO, STARTING A PROGRAM AT MY WORKPLACE.
SHOULD RESIDENT SUPPLY FUNDS FOR PP&L'S "EARLY RETIREES?" I DON'T THINK SO!
CONSUMERS ARE BEING STUCKEN FROM "ALL ANGLES" OF LIFE, FOOD, CLOTHING, RECREATION, UTILITY, TAXES ALL HAVE ONE THING IN COMMON, PEOPLE, WE CANNOT CONTINUE TO BE SLICED UPON BY THE CONTROLLER. THE AMERICAN HE WILL NOT BE SERVED IN STANDARD PROPORTIONS BUT FEEBLE SLIVERS IF THESE TRENDS CONTINUE.

NOW BEING IN RETIRE FOR YEARS, I'M READY FOR MY DESERVED COST OF LIVING RAISE. (RETROACTIVE)

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

12445,

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

DO NOT GRANT THIS MANDATE! PUT THIS MATTER INTO REASONABLE
PERSPECTIVE. 1-3% SHOULD BE MORE THAN ENOUGH FOR THIS COMPANY TO PROFIT
ON BEFORE THE NEXT SUBMISSION (PROPOSAL). THANK-YOU MEMBERS OF THE
COMMISSION FOR LISTENING TO OUR VIEWS

(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.

Shed Montgomery

FEBRUARY 25, 1995

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

Date Signed

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

DATE SERVED: March 3, 1995

R-00943271C0100

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 Fred Montgomery. 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.

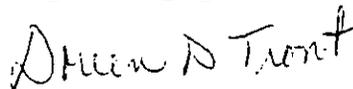
DOCUMENT
FOLDER

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

Very truly yours,



for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 3, 1995

Fred Montgomery
Complainant

VS.

Complaint Docket
No: R-00943271C0100

Pa Power & Light Co
Respondent

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
MAR 02 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT
FOLDER

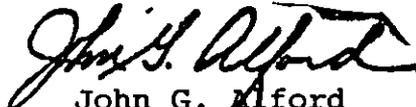
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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


John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

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

FAX: 610/774-6726

ORIGINAL

March 22, 1995



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

**SECRETARY'S OFFICE
Public Utility Commission**

Re: **Fred Montgomery v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0100**

**DOCUMENT
FOLDER**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. Fred Montgomery
The Honorable Robert A. Christianson

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED
MAR 27 1996

Fred Montgomery

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0100

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

**DOCUMENT
FOLDER**

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

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

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

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

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

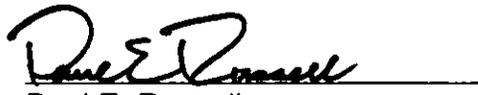
4. This paragraph constitutes a prayer for relief to which no answer is required.

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 22, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM

Pennsylvania Public Utility Commission

R-00943271C0101
110500

ORIGINAL

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

95 MAR 1 AM 9:11

RECEIVED

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name JOHN R. MORGAN

Street/P.O. Box 223 MAIN STREET Apt#

City NORTHAMPTON State PA Zip 18067-1952

County NORTHAMPTON Home Telephone-Area Code ()

Work Telephone-Area Code ()

2. Which company does your complaint concern?

Name of Company PENNSYLVANIA POWER & LIGHT.

3. What is your complaint?

INTENDED RATE HIKE BY PPEL. WHY IF
THERE HAS TO BE A RATE INCREASE DOES IT HAVE
TO BE SO LARGE (30% IS CONSIDERED EXCESSIVE)

AS THE PUC PLACE A (CAP) ON HOW MUCH
A UTILITY CAN INCREASE IT'S RATES PER YEAR.

DOCKETED
MAR 02 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?

To Place on any and all utilities a cap ..
percentage that can be charged within a fiscal year.
You would not have had the response to this issue
if you would implement that concern. If PPU
would have placed a even a 3% a year seven years
ago they would now have 1% over and people would not
be up in arms. Why is it the consumer has to have the
burden upon them? (I know that what ever salary increase
I receive I have to make due with no matter what happens.)
The thing to remember that no matter who you are
(ie) [baseball player] and how famous the public will only
stand for so much, before they arms and speak up.

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

5. You must sign and date your complaint.

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

John P. Morgan
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 3, 1995

R-00943271C0101

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 John R. Morgan. 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.

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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 3, 1995

John R. Morgan
Complainant

VS.

Complaint Docket
No: R-00943271C0101

Pa Power & Light Co
Respondent

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
MAR 02 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT
FOLDER

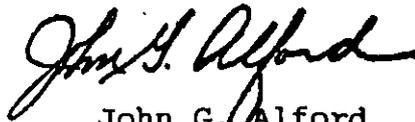
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

KJP

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

FAX: 610/774-6726

ORIGINAL

March 22, 1995

**DOCUMENT
FOLDER**

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

RECEIVED
MAR 22 1995

**SECRETARY'S OFFICE
Public Utility Commission**

Re: **John R. Morgan v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0101

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. John R. Morgan
The Honorable Robert A. Christianson

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

John R. Morgan

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0101

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 Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Mr. John R. Morgan
223 Main Street
Northampton, Pennsylvania 18067-1952

Dated this 22nd day of March, 1995.


Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCUMENT
FILED

John R. Morgan

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0101

ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY

DOCKETED
MAR 27 1995

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

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

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, 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 22, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0102
110500

Please Print:

ORIGINAL

Zip Code - 18951

1. Your Name, Mailing Address and Telephone Number

Name William H. Schippes - 2-24-95
Street/P.O. Box 1750 Kurney Rd Apt# _____
City Quakertown State Pa Zip 18951
County Bucks Home Telephone-Area Code (215) 536-6412
Work Telephone-Area Code () _____

2. Which company does your complaint concern?

Name of Company Pa Power & Light Co.

3. What is your complaint?

RECEIVED
MAR 1 AM
PA. P. UTIL. COM. DIV.

My wife is 70 and I am 83, we are long long time customers of P. P. & L. and our records of payment is perfect. We try hard to keep our wood clean our homes heated with electricity also all appliances are all electric. The rate we are paying is ridiculous. Our total income we receive from Social Security and our small investments total approximately \$730⁰⁰ per month. our electric bill is 23% of our total income. Our expenses for food, taxes, car and home insurance, medical bills, telephone and other, place us in a necessary withdrawal of 20⁰⁰ to 400⁰⁰ per mo. from our small and limited savings. This situation means chaos for us.

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

DOCKETED

MAR 02 1995

(-over-)

DOCUMENT FOLDER

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

Back in the 1950's and 60's our electric bills were less than 10% of our income. Why is it necessary to have such an enormous increase in electric rates? When I wanted to expand my farm operation in 1953, it was necessary to borrow from my bank. I could not ask my customers to pay for my expansion. Why doesn't P.P.S. borrow money from their resources? Our dog air income will be such that only our Social Security will be left. We need lower cost electric bills not a 20% hike. How about a senior citizen 10% lower rate? We need help.

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

5. You must sign and date your complaint.

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

William H. Schuppert

2-24-95

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

DATE SERVED: March 3, 1995

R-00943271C0102

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 William H. Schippers. 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.

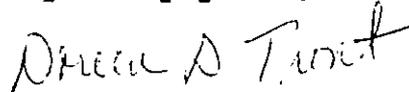
DOCUMENT
FOLDER

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 3, 1995

William H. Schippers
Complainant

VS.

Complaint Docket
No: R-00943271C0102

Pa Power & Light Co
Respondent

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT
FOLDER

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

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

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

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

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


John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

KJR

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

FAX: 610/774-6726

ORIGINAL

**DOCUMENT
FOLDER**

March 22, 1995

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

RECEIVED
MAR 22 1995

**SECRETARY'S OFFICE
Public Utility Commission**

Re: **William H. Schippers v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0102**

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. William H. Schippers
The Honorable Robert A. Christianson

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

William H. Schippers

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0102

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 Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Mr. William H. Schippers
1750 Kumry Road
Quakertown, Pennsylvania 18251

Dated this 22nd day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCUMENT
FOLDER

William H. Schippers

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0102

DOCKETED
MAR 27 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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

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

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, 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", 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 22, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission
R-00943271C0103
110500

KJR

ORIGINAL

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name Mrs ELEANOR E. RITTER
Street/P.O. Box 354 RTE 2 Apt# _____
City KUNKLETOWN State PA. Zip 18058
County CARBON Home Telephone-Area Code (610) 844-5400
Work Telephone-Area Code () _____

2. Which company does your complaint concern?

Name of Company P.P. & R

3. What is your complaint?

BEING ON A FIXED INCOME I
AFFORD ANYMORE INCREASES IN ANYTHING
MY HEALTH INS. KEEPS GOING UP. I DO EVERY
THING ELSE.

RECEIVED
95 MAR 02 1995
INFO. CONT. DIV.
FA. ANT. DIV.
REG. DIV.

INDEXED
MAR 02 1995

DOCUMENT
FOLDER

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

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

Keep RATES Where They Are or Lower Them

(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.

Thomas E. Pitter

2/24/95

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

DATE SERVED: March 3, 1995

R-00943271C0103

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 Eleanor E. Ritter. 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.

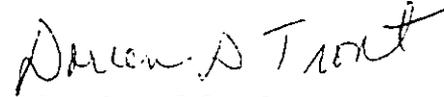
DOCUMENT
FOLDER

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 3, 1995

Eleanor E. Ritter
Complainant

VS.

Complaint Docket
No: R-00943271C0103

Pa Power & Light Co
Respondent

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
MAR 02 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

**DOCUMENT
FOLDER**

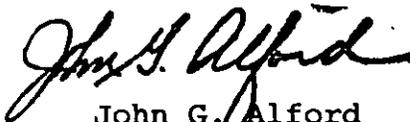
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

KJR

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

FAX: 610/774-6726

ORIGINAL

March 22, 1995

RECEIVED
MAR 22 1995

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

SECRETARY'S OFFICE
Public Utility Commission

Re: **Eleanor E. Ritter v.**
Pennsylvania Power & Light Company
Docket No. R-00943271C0103

DOCUMENT
FOLDER

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Ms. Eleanor E. Ritter
The Honorable Robert A. Christianson

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Eleanor E. Ritter

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0103

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 Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Ms. Eleanor E. Ritter
354 Route 2
Kunkletown, Pennsylvania 18058

Dated this 22nd day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED
MAR 27 1995

Eleanor E. Ritter

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0103

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

**DOCUMENT
FOLDER**

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

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

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

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, 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 22, 1995
at Allentown, Pennsylvania

DATE: March 3, 1995

SUBJECT: R-00943271C0103

TO: Office of Administrative Law Judge

FROM: John G. Alford, Secretary *JA*

DOCKETED
MAR 02 1995

REPORT
FOLDER

PENNSYLVANIA POWER AND LIGHT COMPANY

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

This matter is assigned to your office for action.

Attachment - copy of complaint

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

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission
R-00943271C0104
110500

ORIGINAL

Please Print:

RECEIVED
95 MAR -2 AM 9:52
PA. P. U. C.
INFO. CONTROL DIV.
ZIP 18334

1. Your Name, Mailing Address and Telephone Number

Name MICHAEL & KRIST FERRELLA
Street/P.O. Box HC 62 BOX 3375 Apt# _____
City LONG POND State PA Zip 18334
County MONROE Home Telephone-Area Code (717) 646-6514
Work Telephone-Area Code () _____

2. Which company does your complaint concern?

Name of Company PENNSYLVANIA POWER & LIGHT CO.

3. What is your complaint?

PP&L WANTS TO INCREASE RESIDENTIAL
RATES BY 20.7 PER CENT.

INDEXED
MAR 03 1995

DOCUMENT
FOLDER

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

(-over-)

43

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

I WOULD ^{LIKE} PUC TO DISCOURAGE
SUCH A RATE INCREASE. THE INCOME LEVEL
IN THIS AREA CANNOT BEAR THIS BURDEN.
THE COST OF ELECTRIC IN MY AREA IS OUTRAGEOUS
AS IT IS — NOT TO MENTION THE OVERWHELMING
TAXES IMPOSED ON ENERGY USAGE! IT'S IMPOSSIBLE
FOR THE AVERAGE PERSON TO GET AHEAD, LET
ALONE MAKE ENDS MEET. TELL P&L TO TIGHTEN
THEIR BELTS LIKE WE MUST DO; RE-THINK HOW
THEY SPEND AND STOP PUTTING A FINANCIAL STRAIN
ON US — WE ARE CAPTIVE CUSTOMERS, UNABLE TO
GO TO A COMPETITOR!

(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.

Kim A. Ferrara

2/27/95

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 6, 1995

R-00943271C0104

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

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Michael and Kriss Ferrara. 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.

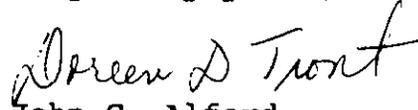
DOCUMENT
FOLDER

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 6, 1995

DOCKETED
MAR 03 1995

Michael and Kriss Ferrara
Complainant

VS.

Complaint Docket
No: R-00943271C0104

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

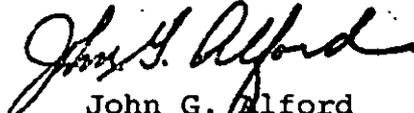
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

^{KJR}
**DOCUMENTS
FOLDER**

March 22, 1995

RECEIVED
MAR 22 1995

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

**SECRETARY'S OFFICE
Public Utility Commission**

**Re: Michael and Kriss Ferrara v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0104**

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: Michael and Kriss Ferrara
The Honorable Robert A. Christianson

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Michael and Kriss Ferrara

v.

Pennsylvania Power & Light
Company

:
:
: Complaint Docket
: No. R-00943271C0104
:
:
:

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 Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Michael and Kriss Ferrara
HC 62 Box 3375
Long Pond, Pennsylvania 18334

Dated this 22nd day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCUMENT
FILED

Michael and Kriss Ferrara

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0104

DOCKETED
MAR 27 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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

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

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, 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 22, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM

Pennsylvania Public Utility Commission

R-00943271C0105
110500

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

95 MAR -2 AM 9:53

RECEIVED

Please Print:

ORIGINAL

1. Your Name, Mailing Address and Telephone Number

Name RONALD GERHARD

Street/P.O. Box 6672 Wild Cherry Drive Apt#

City COOPERSBURG State Pa. Zip 17036

County Lehigh Home Telephone-Area Code (610) 282-4359

Work Telephone-Area Code (610) 709-3575

DOCKETED
MAR 03 1995

2. Which company does your complaint concern?

Name of Company PP&L (Penna. Power & Light)

DOCUMENT
FOLDER

3. What is your complaint?

The proposed 20% Rate Increase is ridiculous. In building a new home we were convinced to go total electric by the Company since they indicated they were competitive in price. Shortly after we moved in we heard of their proposals what kind of management does not monitor its cost structure so as to pass on smaller increases more often to its customers rather than suddenly realize they need a 20% adjustment. The average worker does not realize a 20% wage increase for many years. If this Company had competition they would be reducing rates rather than raising them and call their senior managers would be fired. They should be looking at their internal productivity & efficiency ~~rather than~~ to reduce costs rather than using the PUC & their monopoly status to do

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

ridiculous things like this.

(-over-)

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

Grant a small increase and tell these PPL
executives to set goals which provide for a more
efficient operation which is streamlined identifies
the need for a price increase why offer all
alternatives have been addressed and keeps customers
informed of the timing and need for adjustments
rather than springing one big surprise on them.
Foster a utility business where competitive
forces are at work which surely would drive down
prices. The poor management of PPL probably
would result in that company going out of business
if other choices were available and this price fixing
abolished.

(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.

Ronald E. Garland

3/1/95

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

KJK

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

DATE SERVED: March 6, 1995

R-00943271C0105

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 Ronald Gerhard. 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.

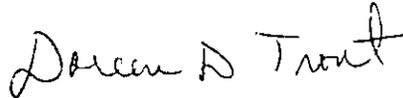
DOCUMENT
FOLDER

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

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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 6, 1995

DOCKETED
MAR 03 1995

Ronald Gerhard
Complainant

VS.

Complaint Docket
No: R-00943271C0105

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

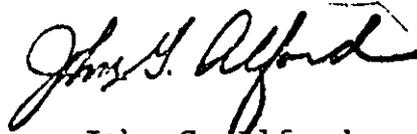
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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



John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company ORIGINAL

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

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

FAX: 610/774-6726

March 27, 1995

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

RECEIVED

MAR 27 1995

Re: **Ronald Gerhard v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0105

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

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. Ronald Gerhard
The Honorable Robert A. Christianson

MENT
LDER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Ronald Gerhard

v.

Pennsylvania Power & Light
Company

:
:
: Complaint Docket
: No. R-00943271C0105
:
:
:

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 Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Mr. Ronald Gerhard
6672 Wild Cherry Drive
Coopersburg, Pennsylvania 18036

Dated this 27th day of March, 1995.



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET
MAR 31 1995

Ronald Gerhard

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0105

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

RECEIVED

MAR 27 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

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

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

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

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

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.

By way of further answer, PP&L has undertaken many initiatives to control its costs, including administrative costs. Those initiatives have helped the

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:



Paul E. Russell
Its Attorney

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

Dated: March 27, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0106
110500

RECEIVED
95 MAR -2 AM 9:52
PA. P. U. C.
INFO. CONTROL DIV.

Please Print:

ORIGINAL

1. Your Name, Mailing Address and Telephone Number

Name Philip R. Kelly

Street/P.O. Box 1552 Farmersville Road Apt#

City Bethlehem State Pa. Zip 18017

County Northampton Home Telephone-Area Code (610) 868 2994

Work Telephone-Area Code ()

2. Which company does your complaint concern?

Name of Company Pennsylvania Power and Light

DOCKETED
MAR 03 1995

3. What is your complaint?

DOCUMENT
FOLDER

This company mounted a vigorous marketing campaign heralding the merits of all electric homes.

Responding to this when we built our new home in 1989

we built it to the company's stiff standards at

considerable added cost and chose a heat pump

rather than more traditional oil heat.

Our complaint is that hiking residential

rates would eliminate much of the savings the

company's promotions promised. Certainly such

an increase would fall most heavily on those

who, heeding the company's advertising, elected

to become All Electric customers.

(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?

(a) Oppose the proposed P.P.H. rate increase - our bills seem to reflect costs as though the increase has already been granted

(b) Press P.P.H. to develop a more customer-friendly billing report - the one we receive seems to be easy for them to interpret but difficult for us.

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

5. You must sign and date your complaint.

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

Philip R Kelly

2/21/95

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 () _____

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

In reviewing the company's request for a 20%
hike in residential rates, consider the inequity
such an increase would create for those who,
following the company's exhortations, elected to
build or buy All Electric homes.

(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.

Philip R. Kelly

2/18/95

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 6, 1995

R-00943271C0106

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 Philip R. Kelly. 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.

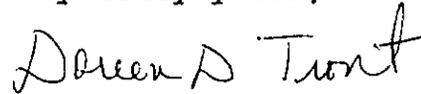
DOCUMENT
FOLDER

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 6, 1995

DOCKETED
MAR 03 1995

Philip R. Kelly
Complainant

VS.

Complaint Docket
No: R-00943271C0106

Pa Power & Light Co
Respondent

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT
FOLDER

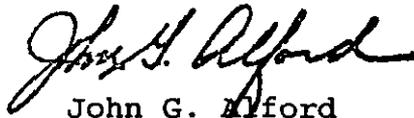
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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


John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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

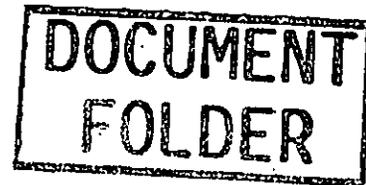
KJR

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

FAX: 610/774-6726

March 27, 1995

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



Re: **Philip R. Kelly v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0106

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. Philip R. Kelly
The Honorable Robert A. Christianson

RECEIVED

MAR 27 1995

**PUBLIC UTILITY COMMISSION
SECRETARY BUREAU**

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Philip R. Kelly

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0106

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 Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

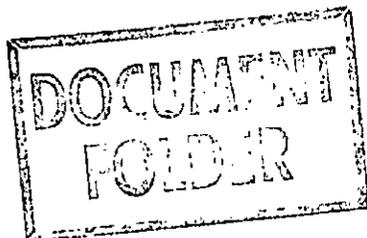
Mr. Philip R. Kelly
1552 Farmersville Road
Bethlehem, Pennsylvania 18017

Dated this 27th day of March, 1995.

DOCKETED
MAR 28 1995



Paul E. Russell



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Philip R. Kelly

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0106

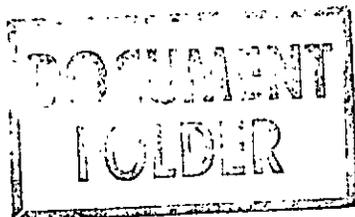
DOCKETED
MAR 28 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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

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



ORIGINAL

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 2,250 KWH (representative use in an all-electric home during the winter) will increase by 9.2%, not the 20% cited in the Complaint.

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

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

Paul E. Russell
Its Attorney

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

Dated: March 27, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0107
110500

RECEIVE

95 MAR -2 AM 9

PA. P. U. C.
INFO. CONTROL

ORIGINAL

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name SUSAN W. JREY
Street/P.O. Box 1819 Elmhurst Dr Apt#
City Whitehall State PA Zip 18052
County Lehigh Home Telephone-Area Code (610) 799-0978
Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

DOCKETED
MAR 03 1995

DOCUMENT
FOLDER

3. What is your complaint?

My complaint is the proposed 21% rate increase for PP&L's residential
customers. This proposal is grossly unfair and unwarranted. Customers
who are already being pressed to their financial limit by job loss and
declining real income will be hard put to handle such an exorbitant increase
in the cost of something they have no choice but to buy. And, in the end,
everyone's taxes (in one form or another) will rise to help pay the electric
utility bills of those who, in increasing numbers, will no longer be able
to pay on their own.

This is a blatantly immoral "passing along" of expenses incurred through
errors in judgement and/or poor business planning. The customer is in no
way obligated to pay for a business's mistakes. We, as customers, cannot
comparison shop for our supplier of electricity, nor can we pass along our
increased living costs to customers we hold captive.

Enough is enough. Let business men and decision makers learn to live within
their means. (If you need more space use additional paper and attach to this form).

(-over-)

23

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

DATE SERVED: March 6, 1995

R-00943271C0107

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 Susan W. Frey. 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.

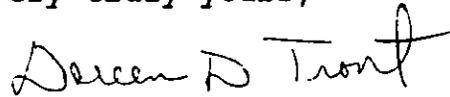
DOCUMENT
FOLDER

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 6, 1995

DOCKETED
MAR 03 1995

Susan W. Frey
Complainant

VS.

Complaint Docket
No: R-00943271C0107

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

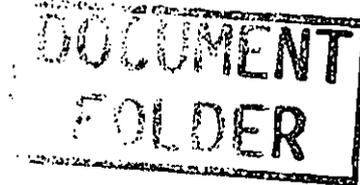
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 27, 1995

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



Re: **Susan W. Frey v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0107

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. Susan W. Frey
The Honorable Robert A. Christianson

RECEIVED

MAR 27 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Susan W. Frey

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0107

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 Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Ms. Susan W. Frey
1819 Elmhurst Drive
Whitehall, Pennsylvania 18052

Dated this 27th day of March, 1995.

DOCKETED
MAR 28 1995


Paul E. Russell

ORIGINAL

DOCUMENT
HOLDER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Susan W. Frey

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0107

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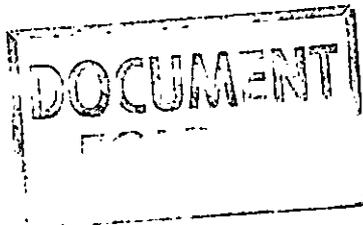
MAR 28 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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

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



ORIGINAL

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 21% cited in the Complaint.

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 Company's filing does not reflect any costs or expenses incurred through errors in judgment and/or poor planning. As demonstrated by the information contained in the filing, all of PP&L's claims are just

and reasonable; reflect prudent planning and operation of PP&L's system; and are fully supported by the Company's filed data.

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 27, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM

Pennsylvania Public Utility Commission

R-00943271C0108

110500

Please Print:

ORIGINAL

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95 MAR -2 AM 9:54

1. Your Name, Mailing Address and Telephone Number

Name Diane Yeager PA. P. U. C. INFO. CONTROL DIV.

Street/P.O. Box 1070 m Cold Stream Cir Apt# M

City Emmaus State Pa Zip 18049

County Lehigh Home Telephone-Area Code (610) 966-9654

Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

DOCKETED

MAR 03 1995

Name of Company PP&L, ALLENTOWN, PA

DOCUMENT FOLDER

3. What is your complaint?

My complaint is the proposed 21% rate increase for PP&L's residential customers. This proposal is grossly unfair and unwarranted. Customers who are already being pressed to their financial limit by job loss and declining real income will be hard put to handle such an exorbitant increase in the cost of something they have no choice but to buy. And, in the end, everyone's taxes (in one form or another) will rise to help pay the electric utility bills of those who, in increasing numbers, will no longer be able to pay on their own.

This is a blatantly immoral "passing along" of expenses incurred through errors in judgement and/or poor business planning. The customer is in no way obligated to pay for a business's mistakes. We, as customers, cannot comparison shop for our supplier of electricity, nor can we pass along our increased living costs to customers we hold captive.

Enough is enough. Let business men and decision makers learn to live within their means. (If you need more space use additional paper and attach to this form).

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

Deny any and all rate increases requested by PP&L.

Handwritten notes and multiple horizontal lines for additional text.

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

5. You must sign and date your complaint.

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

William L. Yeager

2/25/95

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

DATE SERVED: March 6, 1995

R-00943271C0108

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 Yeager. 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

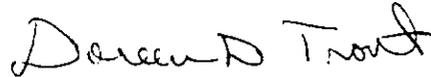
R-00943271C0108

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

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

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

Very truly yours,



for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED
MAR 03 1995

DATE SERVED: March 6, 1995

Diane Yeager
Complainant

VS.

Complaint Docket
No: R-00943271C0108

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. Clifford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

KJR

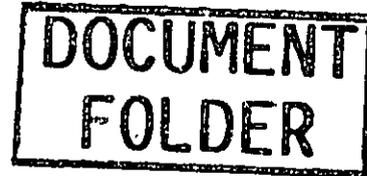
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 27, 1995

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



Re: **Diane Yeager v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0108

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

RECEIVED

MAR 27 1995

cc: Ms. Diane Yeager
The Honorable Robert A. Christianson

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Diane Yeager

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0108

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 Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Ms. Diane Yeager
1070 M Cold Stream Circle
Emmaus, Pennsylvania 18049

Dated this 27th day of March, 1995.

DOCKETED
MAR 28 1995


Paul E. Russell

DOCUMENT
FOLDER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Diane Yeager

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0108

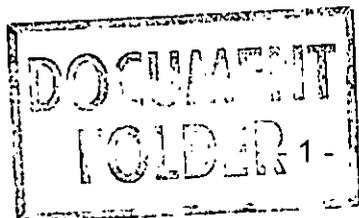
DOCKETED

MAR 28 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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



ORIGINAL

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 21% cited in the Complaint.

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 Company's filing does not reflect any costs or expenses incurred through errors in judgment and/or poor planning. As demonstrated by the information contained in the filing, all of PP&L's claims are just

and reasonable; reflect prudent planning and operation of PP&L's system; and are fully supported by the Company's filed data.

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

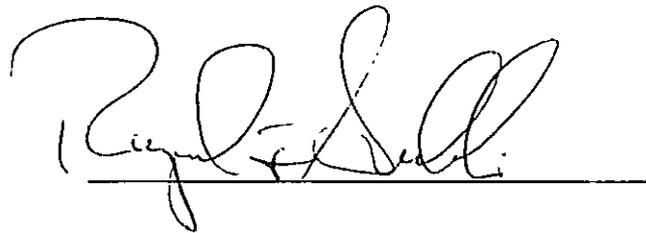
Of Counsel:
David B. MacGregor, Esquire
Morgan, Lewis & Bockius
2000 One Logan Square
Philadelphia, Pennsylvania 19103

Dated: March 27, 1995
at Allentown, Pennsylvania

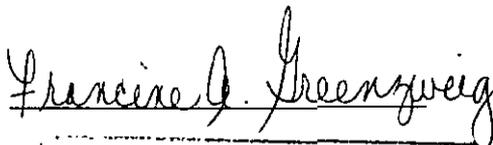
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
: SS
COUNTY OF LEHIGH)

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



Sworn to and subscribed
before me this 27th day
of March, 1995.



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

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0109
110500

Please Print:

ORIGINAL RECEIVED
95 MAR -2 AM 9:54

1. Your Name, Mailing Address and Telephone Number

Name PATRICIA ADAIR PA. P. U. C. INFO CONTROL DIV.

Street/P.O. Box 550 Wolkups Mill Rd. Apt# _____

City STEVENS State PA Zip 17578

County LANCASTER Home Telephone-Area Code (717) 336-2080

Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

DOCKETED
MAR 03 1995

Name of Company PP&L, ALLENTOWN, PA

3. What is your complaint?

DOCUMENT FOLDER

My complaint is the proposed 21% rate increase for PP&L's residential
customers. This proposal is grossly unfair and unwarranted. Customers
who are already being pressed to their financial limit by job loss and
declining real income will be hard put to handle such an exorbitant increase
in the cost of something they have no choice but to buy. And, in the end,
everyone's taxes (in one form or another) will rise to help pay the electric
utility bills of those who, in increasing numbers, will no longer be able
to pay on their own.

This is a blatantly immoral "passing along" of expenses incurred through
errors in judgement and/or poor business planning. The customer is in no
way obligated to pay for a business's mistakes. We, as customers, cannot
comparison shop for our supplier of electricity, nor can we pass along our
increased living costs to customers we hold captive.

Enough is enough. Let business men and decision makers learn to live within
their means. (If you need more space use additional paper and attach to this form).

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

Deny any and all rate increases requested by PP&L.

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

5. You must sign and date your complaint.

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

Patricia Adair

2-24-95

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

DATE SERVED: March 6, 1995

R-00943271C0109

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

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Patricia Adair. 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.

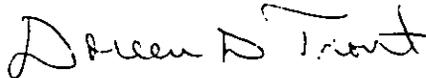
DOCUMENT
FOLDER

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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 6, 1995

DOCKETED
MAR 03 1995

Patricia Adair
Complainant

VS.

Complaint Docket
No: R-00943271C0109

Pa Power & Light Co
Respondent

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

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FOLDER

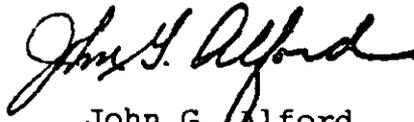
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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



John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



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 27, 1995

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



Re: **Patricia Adair v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0109

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Ms. Patricia Adair
The Honorable Robert A. Christianson

RECEIVED

MAR 27 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Patricia Adair

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0109

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 Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

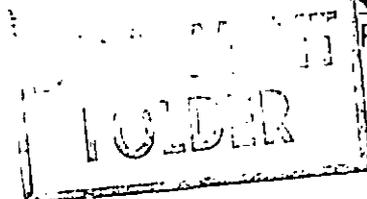
Ms. Patricia Adair
550 Wollups Hill Road
Stevens, Pennsylvania 17578

Dated this 27th day of March, 1995.

DOCKETED
MAR 28 1995



Paul E. Russell



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Patricia Adair

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0109

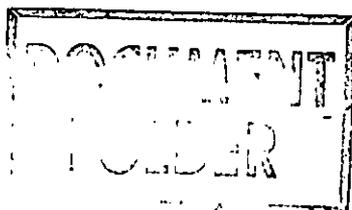
**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

DOCKETED
MAR 23 1995

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

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

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



ORIGINAL

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 21% cited in the Complaint.

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 Company's filing does not reflect any costs or expenses incurred through errors in judgment and/or poor planning. As demonstrated by the information contained in the filing, all of PP&L's claims are just

and reasonable; reflect prudent planning and operation of PP&L's system; and are fully supported by the Company's filed data.

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 27, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0110
110500

Please Print:

ORIGINAL

RECEIVED

95 MAR -2 AM 9:54

1. Your Name, Mailing Address and Telephone Number

Name Jane C. LAGOSKY

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

Street/P.O. Box 509 Railroad St Apt# —

City Allentown State Pa Zip 18102

County Lehigh Home Telephone-Area Code (610) 437-6385

Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

DOCKETED
MAR 03 1995

Name of Company PP&L, ALLENTOWN, PA

DOCUMENT
FOLDER

3. What is your complaint?

My complaint is the proposed 21% rate increase for PP&L's residential
customers. This proposal is grossly unfair and unwarranted. Customers
who are already being pressed to their financial limit by job loss and
declining real income will be hard put to handle such an exorbitant increase
in the cost of something they have no choice but to buy. And, in the end,
everyone's taxes (in one form or another) will rise to help pay the electric
utility bills of those who, in increasing numbers, will no longer be able
to pay on their own.

This is a blatantly immoral "passing along" of expenses incurred through
errors in judgement and/or poor business planning. The customer is in no
way obligated to pay for a business's mistakes. We, as customers, cannot
comparison shop for our supplier of electricity, nor can we pass along our
increased living costs to customers we hold captive.

Enough is enough. Let business men and decision makers learn to live within
their means. (If you need more space use additional paper and attach to this form).

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

Deny any and all rate increases requested by PP&L.

Handwritten notes and lines on the form, including "12:" and "VII".

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

5. You must sign and date your complaint.

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

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

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 6, 1995

R-00943271C0110

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

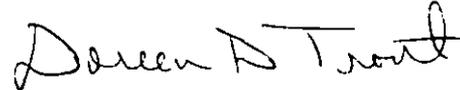
DOCUMENT
FOLDER

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

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

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

Very truly yours,



for John G. Alford
Secretary

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED
MAR 03 1995

DATE SERVED: March 6, 1995

Jane C. Lagosky
Complainant

VS.

Complaint Docket
No: R-00943271C0110

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

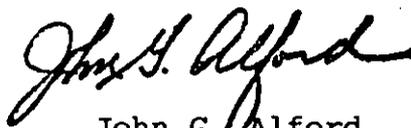
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. 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 27, 1995

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

Re: **Jane C. Lagosky v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0110

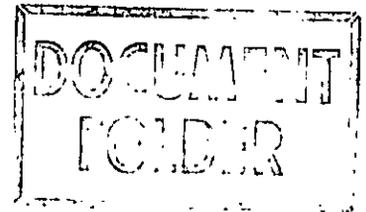
Dear Secretary Alford:

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. Jane C. Lagosky
The Honorable Robert A. Christianson

RECEIVED

MAR 27 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Jane C. Lagosky

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0110

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):

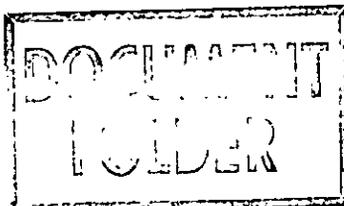
The Honorable Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Ms. Jane C. Lagosky
509 Railroad Street
Allentown, Pennsylvania 18102

Dated this 27th day of March, 1995.



Paul E. Russell



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Jane C. Lagosky

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0110

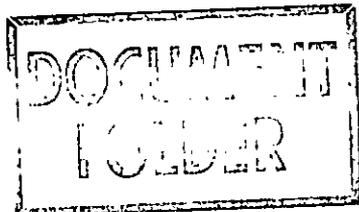
DOCKETED
MAR 23 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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

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



ORIGINAL

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 21% cited in the Complaint.

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 Company's filing does not reflect any costs or expenses incurred through errors in judgment and/or poor planning. As demonstrated by the information contained in the filing, all of PP&L's claims are just

and reasonable; reflect prudent planning and operation of PP&L's system; and are fully supported by the Company's filed data.

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 27, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0111
110500

Please Print:

ORIGINAL

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95 MAR -2 AM 9:54

1. Your Name, Mailing Address and Telephone Number

Name Debra L. Winch PA. P. U. C. INFO CONTROL DIV.
Street/P.O. Box 1223 Washington St Apt# 1
City Whitehall State PA Zip 18052
County Lehigh Home Telephone-Area Code (610) 266-6793
Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

DOCKETED

MAR 03 1995

**DOCUMENT
FOLDER**

3. What is your complaint?

My complaint is the proposed 21% rate increase for PP&L's residential
customers. This proposal is grossly unfair and unwarranted. Customers
who are already being pressed to their financial limit by job loss and
declining real income will be hard put to handle such an exorbitant increase
in the cost of something they have no choice but to buy. And, in the end,
everyone's taxes (in one form or another) will rise to help pay the electric
utility bills of those who, in increasing numbers, will no longer be able
to pay on their own.

This is a blatantly immoral "passing along" of expenses incurred through
errors in judgement and/or poor business planning. The customer is in no
way obligated to pay for a business's mistakes. We, as customers, cannot
comparison shop for our supplier of electricity, nor can we pass along our
increased living costs to customers we hold captive.

Enough is enough. Let business men and decision makers learn to live within
their means. (If you need more space use additional paper and attach to this form).

(-over-)

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

Deny any and all rate increases requested by PP&L.

Multiple horizontal lines for writing the answer to question 4.

(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.

Debra L. Birch

2-24-25

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

DATE SERVED: March 6, 1995

R-00943271C0111

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 Debra L. Winch. 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

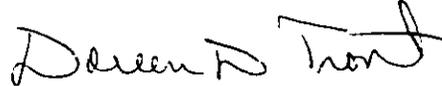
R-00943271C0111

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 6, 1995

DOCKETED
MAR 03 1995

Debra L. Winch
Complainant

VS.

Complaint Docket
No: R-00943271C0111

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.

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


John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

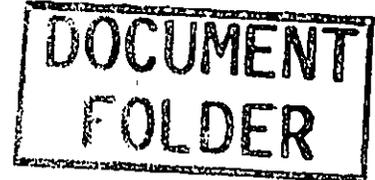
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 27, 1995

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



**Re: Debra L. Winch v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0111**

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. Debra L. Winch
The Honorable Robert A. Christianson

RECEIVED

MAR 27 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debra L. Winch

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0111

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):

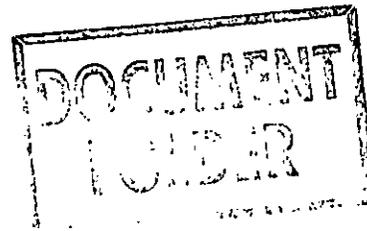
The Honorable Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Ms. Debra L. Winch
1223 Washington Street
Apt. 1
Whitehall, Pennsylvania 18052

Dated this 27th day of March, 1995.

ORIGINAL


Paul E. Russell



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debra L. Winch

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0111

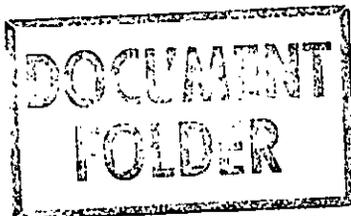
DOCKETED
MAR 28 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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

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



ADDITIONAL

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%.

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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 Company's filing does not reflect any costs or expenses incurred through errors in judgment and/or poor planning. As demonstrated by the information contained in the filing, all of PP&L's claims are just

and reasonable; reflect prudent planning and operation of PP&L's system; and are fully supported by the Company's filed data.

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 27, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0112
110500

Please Print:

ORIGINAL RECEIVED

95 MAR -2 AM 9:54

1. Your Name, Mailing Address and Telephone Number

Name Laura Happ
Street/P.O. Box 1462 Main St. Apt# Fl. 3
City Bethlehem State PA. Zip 18018
County Northampton Home Telephone-Area Code (610) 866-4034
Work Telephone-Area Code (610) 820-4930

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

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

DOCKETED
MAR 03 1995

3. What is your complaint?

DOCUMENT
FOLDER

My complaint is the proposed 21% rate increase for PP&L's residential
customers. This proposal is grossly unfair and unwarranted. Customers
who are already being pressed to their financial limit by job loss and
declining real income will be hard put to handle such an exorbitant increase
in the cost of something they have no choice but to buy. And, in the end,
everyone's taxes (in one form or another) will rise to help pay the electric
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comparison shop for our supplier of electricity, nor can we pass along our
increased living costs to customers we hold captive.

Enough is enough. Let business men and decision makers learn to live within
their means. (If you need more space use additional paper and attach to this form).

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

Deny any and all rate increases requested by PP&L.

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

5. You must sign and date your complaint.

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

Laura L. Hays

2-24-95

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 6, 1995

R-00943271C0112

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

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Laura Happ. 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.

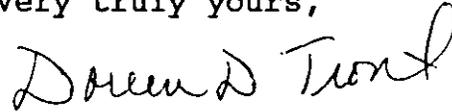
DOCUMENT
FOLDER

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 6, 1995

Laura Happ
Complainant

VS.

Pa Power & Light Co
Respondent

Complaint Docket
No: R-00943271C0112

FORMAL COMPLAINT
NOTICE TO RESPONDENT
TO ANSWER OR SATISFY

DOCKETED
MAR 03 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT
FOLDER

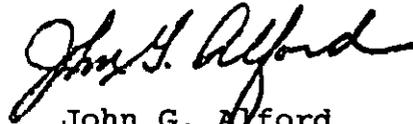
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



Pennsylvania Power & Light Company

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 27, 1995

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



Re: **Laura Happ v.
Pennsylvania Power & Light Company**
Docket No. R-00943271C0112

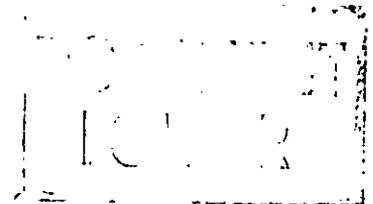
Dear Secretary Alford:

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. Laura Happ
The Honorable Robert A. Christianson

RECEIVED

MAR 27 1995

PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Laura Happ

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0112

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):

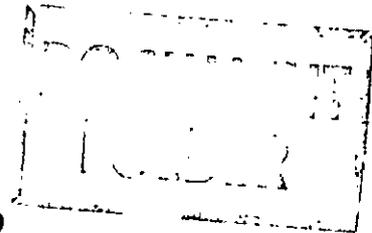
The Honorable Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Ms. Laura Happ
1462 Main Street, 3rd Floor
Bethlehem, Pennsylvania 18018

Dated this 27th day of March, 1995.

DOCKETED

MAR 28 1995



Paul E. Russell

Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Laura Happ

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0112

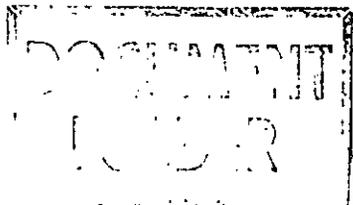
DOCKETED
MAR 28 1995

**ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY**

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

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

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



ORIGINAL

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 21% cited in the Complaint.

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 Company's filing does not reflect any costs or expenses incurred through errors in judgment and/or poor planning. As demonstrated by the information contained in the filing, all of PP&L's claims are just

and reasonable; reflect prudent planning and operation of PP&L's system; and are fully supported by the Company's filed data.

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT
COMPANY

By:

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

Paul E. Russell
Its Attorney

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

Dated: March 27, 1995
at Allentown, Pennsylvania

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

R-00943271C0113
110500

Please Print:

ORIGINAL RECEIVED
95 MAR -2 AM 9:54

1. Your Name, Mailing Address and Telephone Number

Name Helen M Lewis PA. P. U. C. INFO. CONTROL DIV.
Street/P.O. Box 416 Kansas Ave Apt# _____
City Whitehall State PA Zip 18052
County Lehigh Home Telephone-Area Code (610) 726-1339
Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

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MAR 03 1995

DOCUMENT FOLDER

3. What is your complaint?

My complaint is the proposed 21% rate increase for PP&L's residential customers. This proposal is grossly unfair and unwarranted. Customers who are already being pressed to their financial limit by job loss and declining real income will be hard put to handle such an exorbitant increase in the cost of something they have no choice but to buy. And, in the end, everyone's taxes (in one form or another) will rise to help pay the electric utility bills of those who, in increasing numbers, will no longer be able to pay on their own.

This is a blatantly immoral "passing along" of expenses incurred through errors in judgement and/or poor business planning. The customer is in no way obligated to pay for a business's mistakes. We, as customers, cannot comparison shop for our supplier of electricity, nor can we pass along our increased living costs to customers we hold captive.

Enough is enough. Let business people learn to live within their company's means.

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

(-over-)

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

Deny any and all rate increases requested by PP&L.

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

5. You must sign and date your complaint.

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

Robert M. Lewis

2/24/95

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

DATE SERVED: March 6, 1995

R-00943271C0113

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 Helen M. Lewis. 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 6, 1995

DOCKETED
MAR 03 1995

Helen M. Lewis
Complainant

VS.

Complaint Docket
No: R-00943271C0113

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

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 27, 1995

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

Re: **Helen M. Lewis v.
Pennsylvania Power & Light Company
Docket No. R-00943271C0113**

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."

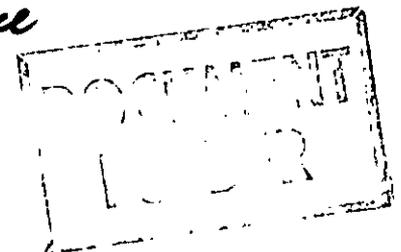
Pursuant to 52 Pa. Code §1.11, I have attached U.S. Postal Form 3817 to evidence this filing.

Very truly yours,

Paul E. Russell

Enclosures

cc: Ms. Helen M. Lewis
The Honorable Robert A. Christianson



RECEIVED

MAR 27 1995

ORIGINAL PUBLIC UTILITY COMMISSION
SECRETARY BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Helen M. Lewis

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0113

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 Robert A. Christianson
Administrative Law Judge
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, Pennsylvania 17105-3265

Ms. Helen M. Lewis
416 Kansas Avenue
Whitehall, Pennsylvania 18052

Dated this 27th day of March, 1995.

DOCKETED
MAR 28 1995



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Helen M. Lewis

v.

Pennsylvania Power & Light
Company

Complaint Docket
No. R-00943271C0113

ANSWER OF
PENNSYLVANIA POWER & LIGHT COMPANY

DOCKETED
MAR 28 1995

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

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

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MAR 28 1995

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, not the 21% cited in the Complaint.

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 Company's filing does not reflect any costs or expenses incurred through errors in judgment and/or poor planning. As demonstrated by the information contained in the filing, all of PP&L's claims are just

and reasonable; reflect prudent planning and operation of PP&L's system; and are fully supported by the Company's filed data.

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 27, 1995
at Allentown, Pennsylvania

