

R-943271

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

RECEIVED  
95 MAR 31 AM 9:29  
PA. P. U. C.  
INFO. CONTROL DIV.  
KJR

R-00943271C0134

110500

Please Print:

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

Name Joseph McAndrew

Street/P.O. Box 85 W. Chestnut Apt# \_\_\_\_\_

City Macungie State PA Zip 18062

County Lehigh Home Telephone-Area Code (610) 966-4537

Work Telephone-Area Code (610)

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

Name of Company PP&L

**3. What is your complaint?**

Cost of electricity is too high to run  
our home.

(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?

Down size your administrative costs.  
Down size in all your areas. The cost of heating our homes must go down. No increase in operating costs. Decrease in the cost of electricity

(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.

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

3-10-95  
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 ( ) \_\_\_\_\_

KJR

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

DATE SERVED: April 7, 1995

R-00943271C0134

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

DOCUMENT  
FOLDER

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Joseph McAndrew. 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.

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,

*Nicole Wilkerson*

for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: April 7, 1995

DOCKETED

APR 07 1995

Joseph McAndrew  
Complainant

VS.

Complaint Docket  
No: R-00943271C0134

Pennsylvania Power & Light  
Company  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

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. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

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

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

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

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

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

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

A handwritten signature in black ink, appearing to read "John G. Alford". The signature is written in a cursive style with a large, sweeping initial "J".

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

KJR

FAX: 610/774-6726

April 27, 1995

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

RECEIVED

APR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Re: **Joseph McAndrew v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0134

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

DOCUMENT  
FOLDER

cc: Mr. Joseph McAndrew  
The Honorable Robert A. Christianson

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joseph McAndrew

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0134

RECEIVED

APR 27 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 Robert A. Christianson  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. Joseph McAndrew  
85 West Chestnut Street  
Macungie, Pennsylvania 18062

Dated this 27th day of April, 1995.



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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

05  
**DOCKETED**  
**MAY 04 1995**

Joseph McAndrew

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0134

**RECEIVED**

**APR 27 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. Denied. PP&L does not have knowledge or information sufficient

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

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

**DOCUMENT  
FOLDER**

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, 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: April 27, 1995  
at Allentown, Pennsylvania



R-943271

FORMAL COMPLAINT FORM

Pennsylvania Public Utility Commission

RECEIVED

00094327100135

95 MAR 30 AM 8:37

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

Please Print:

110500

1. Your Name, Mailing Address and Telephone Number

Name Maureen Mc Andrew

Street/P.O. Box 85 W. Chestnut Apt#

City Macungie State PA Zip 18062

County Lehigh Home Telephone-Area Code (610) 966-4537

Work Telephone-Area Code ( )

2. Which company does your complaint concern?

Name of Company P P e L

3. What is your complaint?

The cost of electricity is too high, we can't  
afford to heat our home, we are always  
cold and our home has been P P e L heat checked  
for insulation.

(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?

No increase - decrease rates - downsize until  
it hurts, we deserve lower rates.

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

5. You must sign and date your complaint.

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

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

3-21-95  
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: April 7, 1995

R-00943271C0135

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

DOCUMENT  
FOLDER

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Maureen McAndrew. 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.

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: April 7, 1995

DOCUMENTED  
APR 07 1995

Maureen McAndrew  
Complainant

VS.

Complaint Docket  
No: R-00943271C0135

Pennsylvania Power & Light  
Company  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

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. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

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

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

April 27, 1995

RECEIVED

APR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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

**Re:                   Maureen McAndrew v.  
                          Pennsylvania Power & Light Company  
                          Docket No. R-00943271C0135**

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. Maureen McAndrew  
      The Honorable Robert A. Christianson

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Maureen McAndrew

v.

Pennsylvania Power & Light  
Company

:  
:  
: Complaint Docket  
: No. R-00943271C0135  
:  
:  
:

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**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. Maureen McAndrew  
85 West Chestnut Street  
Macungie, Pennsylvania 18062

Dated this 27th day of April, 1995.



Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**DOCKETED**

**MAY 02 1995**

Maureen McAndrew

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0135

**RECEIVED**

**APR 27 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. 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,

**DOCUMENT  
FOLDER**

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, 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: April 27, 1995  
at Allentown, Pennsylvania



ORIGINAL NORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271 C 0136  
11.0500

RECEIVED  
95 APR -6 AM 8:56  
PA. P. U. C. DIV.  
INFO. CONTROL

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name JAMES T. DOUGHERTY

Street/P.O. Box 2232 MANCHESTER Blvd Apt# \_\_\_\_\_

City Htg State Pa Zip 17112

County DAUPHIN Home Telephone-Area Code (717) 657-5320

Work Telephone-Area Code (800) 352-5326

DOCKETED

APR 10 1995

2. Which company does your complaint concern?

Name of Company PENNA POWER + Light

DOCUMENT  
FOLDER

3. What is your complaint?

P.P.L.'s proposed RATE INCREASE is EXCESSIVE & ALSO MISLEADING. P.P.L. WANTS TO RECOUP in 1 to 2 YEAR THEIR MONIES for NOT HAVING a RATE INCREASE IN 10 YEARS! If P.P.L. had COMPETITION AS THE PHONE COMPANIES do, THEY WOULD NEVER ATTEMPT TO PROPOSE SUCH a RATE INCREASE

MISLEADING - P.P.L. + says THE INCREASE IS ONLY 12-15% OVERALL, WHEN IN REALITY, THEIR PROPOSED INCREASE for base K.W.H. rate is a whopping 38%. P.P.L. is MISLEADING THE public on THE AMOUNT OF THEIR PROPOSED INCREASE as THE bulk of THEIR REVENUE COMES FROM BASE K.W.H. CHARGES. I pity THE PEOPLE ON FIXED INCOME!

(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?

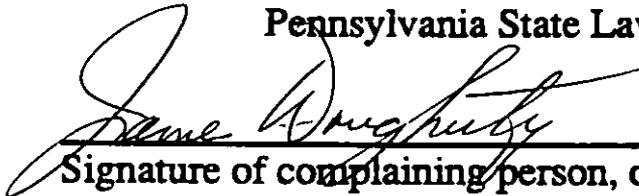
1- HAVE P.P.U. BE HONEST & REVIEW THAT THE REQUEST RATE INCREASE FOR BASE KWH CHARGE IS ACTUALLY 38%!

2- MODIFY RATE INCREASE TO COST OF LIVING 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.

  
Signature of complaining person, or officer

4/5/95  
Date Signed

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

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: April 10, 1995

R-00943271C0136

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

DOCUMENT  
FOLDER

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by James T. Dougherty. 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.

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,

*Nicole Wilkerson*

for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: April 10, 1995

James T. Dougherty  
Complainant

VS.

Complaint Docket  
No: R-00943271C0136

Pennsylvania Power & Light  
Company  
Respondent

DOCKETED  
APR 10 1995

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

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. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

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

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

ORIGINAL

KJR

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

FAX: 610/774-6726

April 27, 1995

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

RECEIVED

APR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Re: **James T. Dougherty v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0136**

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. James T. Dougherty  
The Honorable Robert A. Christianson

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

James T. Dougherty

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0136

RECEIVED

APR 27 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 Robert A. Christianson  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. James T. Dougherty  
2232 Manchester Boulevard  
Harrisburg, Pennsylvania 17112

Dated this 27th day of April, 1995.

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



quantification of PP&L's proposed increase than the estimated impact on an individual billing component.

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:



Paul E. Russell  
Its Attorney

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

Dated: April 27, 1995  
at Allentown, Pennsylvania



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

R-0094327C0137

Please Print: ORIGINAL 110500

RECEIVED  
95 APR -3 AM 9:15  
PA. P. U. C.  
INFO. CONTROL  
Zip 18641

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

Name MAYOR GEORGE LEGEZDH - DUPONT BOROUGH  
Street/P.O. Box 600 CHESTNUT STREET Apt# \_\_\_\_\_  
City DUPONT State PA  
County LUZERNE Home Telephone-Area Code ( 717 ) 655-6216  
Work Telephone-Area Code ( ) \_\_\_\_\_

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

Name of Company PENNSYLVANIA POWER & LIGHT COMPANY

**3. What is your complaint?**

OUR MAJOR CONCERN OR COMPLAINT IS THE FACT THAT OUR BOROUGH IS COMPRISED OF MORE  
THEN 50 % SENIOR CITIZENS ON A FIXED INCOME.

A RAISE OF THE MAGNITUDE THAT PP&L IS REQUESTING WOULD CAUSE MUCH HARDSHIP TO  
MANY PEOPLE.

THEIR INABILITY TO PAY THE INCREASED RATE MIGHT RESULT IN THEIR LIMITING THEIR  
USAGE TO A POINT WHICH MIGHT CAUSE BODILY HARM AND AT THE WORST DEATH.

IT WOULD HAMPER THEIR ENJOYMENT OF THE FEW PLEASURES THEY HAVE LEFT (TV, ETC.)  
AND CERTAINLY COULD HAMPER THE QUALITY OF LIFE FOR A GREAT MANY PEOPLE.

DOCUMENT  
FOLDER

DOCKETED  
APR 10 1995

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

(-over-)

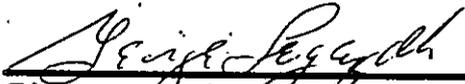
4. What do you want Public Utility Commission to do about your complaint?

PLEASE CONSIDER THE NECESSITY OF THIS RATE HIKE AND STUDY THE PROFIT MARJIN OF  
PP&L AND THEIR CAPITAL IMPROVEMENT PLANS FOR THE FUTURE.

(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.



MAYOR OF DUPONT BOROUGH

MARCH 28, 1995

Signature of complaining person, or officer

Date Signed

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

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: April 10, 1995

R-00943271C0137

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

DOCUMENT  
FOLDER

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Mayor George Legezdh. 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.

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: April 10, 1995

Mayor George Legezdh  
Complainant

VS.

Complaint Docket  
No: R-00943271C0137

Pennsylvania Power & Light  
Company  
Respondent

DOCKETED  
APR 10 1995

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

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. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

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

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

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

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

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

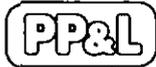
prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

ORIGINAL

KJR

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

FAX: 610/774-6726

April 27, 1995

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

RECEIVED

APR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Re: **Mayor George Legezdh v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0137**

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: Mayor George Legezdh  
The Honorable Robert A. Christianson

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mayor George Legezdh

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0137

RECEIVED

APR 27 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 Robert A. Christianson  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mayor George Legezdh  
Dupont Borough  
600 Chestnut Street  
Dupont, Pennsylvania 18641

Dated this 27th day of April, 1995.



Paul E. Russell



continuing a number of programs to assist these customers and is proposing several new programs in this filing.

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:



Paul E. Russell  
Its Attorney

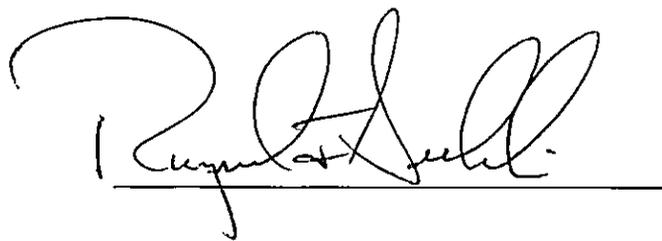
Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: April 27, 1995  
at Allentown, Pennsylvania

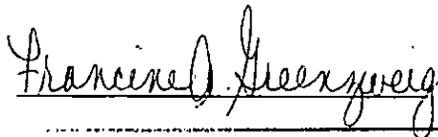
AFFIDAVIT

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 27<sup>th</sup> day  
of April, 1995.



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

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

**ORIGINAL**  
**RECEIVED**  
95 APR -6 PM 3:13  
PA. P. U. C.  
INFO. CONTROL DIV.

Please Print: R-00943271C0138

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

Name John W. Cope  
Street/P.O. Box 312 N. 4th Street Apt# \_\_\_\_\_  
City Sunbury State Pa. Zip 17801  
County Norhtumberland Home Telephone-Area Code ( 717 ) 86 - 6690  
Work Telephone-Area Code ( )

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

Name of Company P P & L

**3. What is your complaint?**

P P & L has a proposed rate increase before the P U C at this time. This proposal  
is seeking a rate increase that I believe discriminates against those customers that  
can least afford to pay the amount they are seeking. That increase amounts to 20% for  
customers using less than 500 Kilowatt hours per month. For customers using 3500  
Kilowatt hours or more the proposed increase is less than 1/2 that amount. This  
appears to me as a way to appease reward those who regularly use large amounts. I  
would use the term Special Customers.

I do not believe that it costs any more to distribute 500 Kws per month over existing  
than it does per KW hour to the larger users. In fact many of these large users are  
new homes erected in in new developments that require all new electrical construction.  
I should not be required to subsidse this new construction through raises for my  
service that is more than double that which high volumn users are being asked to  
bear.

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

**DOCUMENT  
FOLDER**

(-over-)

**DOCKETED**

APR 10 1995

60

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

I can understand the need for a rate increase. I do not believe that charging those who prefer to conserve and limit their use of this service should be required to pay an increase larger than other preferred customers are being asked to pay.

It is my opinion that the P U C is obligated to protect us from this type of abuse and discrimination. When and if a decision is made by the P U C concerning the proposal it should be made on an equal basis. A flat increase for all customers regardless of the amount of use. By flat increase I mean the same percentage per KW hour.

(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.



3/29 / 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:

April 10, 1995

R-00943271C0138

PENNSYLVANIA POWER & LIGHT COMPANY  
PAUL E. RUSSELL, ESQUIRE  
TWO NORTH NINTH STREET  
ALLENTOWN PA 18101-1179

DOCUMENT  
FOLDER

DOCKETED  
APR 10 1995

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

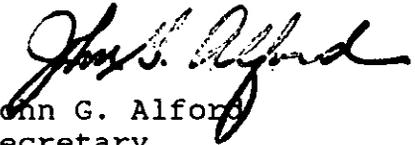
AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

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

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

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

Very truly yours,

  
John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

April 10, 1995

JOHN W. COPE

Complainant

v.

PENNSYLVANIA POWER & LIGHT COMPANY  
Respondent

:  
:  
:  
:  
:

Complaint Docket  
No. R-00943271C0138

---

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. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

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

Section 1.56(a).

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

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

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

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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



Pennsylvania Power & Light Company

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

April 27, 1995

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

RECEIVED

APR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Re: **John W. Cope v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0138

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

DOCUMENT  
FOLDER

cc: Mr. John W. Cope  
The Honorable Robert A. Christianson

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

John W. Cope

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0138

RECEIVED

APR 27 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 Robert A. Christianson  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. John W. Cope  
312 North Fourth Street  
Sunbury, Pennsylvania 17801

Dated this 27th day of April, 1995.



Paul E. Russell

07 AL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

John W. Cope

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0138

**DOCKETED**

**MAY 05 1995**

\_\_\_\_\_  
**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**  
\_\_\_\_\_

**RECEIVED**

**APR 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. By way of further answer, an analysis of PP&L's retail

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

**DOCUMENT  
FOLDER**

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

The impact on individual customers may vary from these average increases, depending upon the amount and pattern of electricity use. For example, the monthly bill for an average residential customer using 1,500 KWH will increase by 12%, 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: April 27, 1995  
at Allentown, Pennsylvania



# FORMAL COMPLAINT FORM

## Pennsylvania Public Utility Commission

R-00943291CD139

RECEIVED  
95 APR 27 PM 2:1  
PA. P. U. C.  
INFO. CONTROL DIV.

Please Print: ORIGINAL 110500

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

Name Terri Morrow  
Street/P.O. Box 50 Woodview Drive Apt# \_\_\_\_\_  
City Elizabethtown State PA Zip 17022  
County Lancaster Home Telephone-Area Code (717) 361-0673  
Work Telephone-Area Code (717) 783-3040

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

Name of Company P P & L

### 3. What is your complaint?

(See attached)

U (W) (C) (A) (E) (T) (E) (L) (L) (L)  
APR 18 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?

*See attached*

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

(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.

*Serri L Morrow*

*4/3/95*

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

# Pennsylvania Power & Light Company

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

March 27, 1995

RECEIVED  
APR 17 11:21:12  
PA. P. U. C. DIV.  
REG. CONTROL

Dear Customer:

You have probably heard that PP&L has proposed to raise base electric rates for the first time in 10 years. I would like to take this opportunity to provide you with some background on the reasons for requesting this increase and to show how it might affect you.

On December 30, 1994, PP&L filed a request for an electric rate increase with the Pennsylvania Public Utility Commission (PUC). The decision to request this increase was a difficult one, but after 10 years of rising costs, it was a decision PP&L could no longer avoid. Any increase granted would take effect in October.

Over the past decade we have worked hard to keep electricity prices stable. During this 10-year period, electricity bills have lagged far behind the rate of inflation. The cost of living, as measured by the Consumer Price Index, has increased 30% in this period. We have taken many steps to avoid rate increases including refinancing high-cost securities, staff reductions, early retirements and other aggressive cost-cutting measures. However, this has not been enough to completely offset the increasing cost of providing you with high quality electric service.

We would like to assure you that, in filing this request, we have made every effort to allocate costs fairly to all classes of customers. We carefully considered the rates charged to our various classes of customers and made every effort to make sure those rates matched our cost of serving those customers.

We would also like you to know that we have stepped up our efforts to help customers on fixed incomes and those who are having a hard time paying their bills.

Regarding the Residential Thermal Storage (RTS) rate which affects you, we are proposing changes to the three main components as follows:

COMPONENT	CURRENT	PROPOSED
Monthly Charge	\$10.95	\$15.00
Billing Demand (In Excess of 2 KW On-Peak)	\$ 5.80 per KW	\$ 6.50 per KW
Cost Per Kilowatt-Hour	\$ .0284 per KWH	\$ .045 per KWH

The effect of these proposed changes on your electric bill will depend on your monthly kilowatt-hour (KWH) use and on-peak billing demand. For example, an RTS customer with a 6 kilowatt (KW) monthly billing demand who uses 25,000 KWH a year could expect their electric bill to increase about \$20.00 a month or 16%.

You and other Residential Thermal Storage customers are important to PP&L and we appreciate your business. If you have any questions concerning this rate increase, please call us toll-free at 1-800-DIAL-PPL (1-800-342-5775).

Sincerely,

Gerald S. Farber  
Manager-Sales & Account Management

3. What is your Complaint?

On March 28, 1995 I received a letter from PP&L (enclosed) with specific information on how their proposed increase would affect customers like me who use the Residential Thermal Storage (RTS) rate. They state that they are proposing changes to the three main components as follows (I added the percentage and dollar increase amounts):

COMPONENT	CURRENT	PROPOSED	% INCREASE	\$ INCREASE*
Monthly Charge	\$10.95	\$15.00	36.95%	\$ 4.05
Billing Demand	5.80	6.50	12.07%	2.80
Cost Per KW	.0284	.045	<u>58.45%</u>	<u>34.58</u>
			44.40%	\$ 41.43

\*Based on an RTS customer with a 6 KW demand who uses 25,000 KWH a year (25,000/12 months = 2,083.33 a month), which was example used by PP&L.

The next paragraph of PP&L's letter reads "For example, an RTS customer with a 6WK monthly billing demand who uses 25,000 KWH a year could expect their electric bill to increase about \$20.00 a month or 16%." As you can see, that's about one-half of what it actually computes to.

On March 31, I spoke with Paul Burks of PP&L and he explained that since the energy charge (another line item on the bill) will be going down from +.010698/KWH to -.000138/KWH, the RTS customers' bill will only increase approximately \$20 or 16%, as the letter stated.

My concern is that the majority of consumers do not take the time to perform the above calculation, and consequently, take PP&L at their written word that their average bill will only increase by \$20 or 16%. They do not realize that PP&L has requested a per KWH increase of over 58% and that the energy charge fluctuates each year depending on fuel costs, etc. I feel that PP&L has been less than straightforward in the information which they have provided to their customers.

In summary, my concerns are:

- 1) PP&L has requested a rate increase of 58%, which is absurd.
- 2) They have not been truthful about their requested rate of increase in their written communications with their customers.

- 4). What do you want the PUC to do about your complaint?
- 1) Require PP&L to adequately disclose increase to all of its customers.
  - 2) Deny PP&L their request for a 58% increase per Kilowatt-Hour.

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

DATE SERVED: April 17, 1995

R-00943271C0139

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

DOCUMENT  
FOLDFR

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Terri Morrow. 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.

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,

*Nicole Wilkerson*

for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: April 17, 1995

DOCKETED  
APR 18 1995

Terri Morrow  
Complainant

VS.

Complaint Docket  
No: R-00943271C0139

Pennsylvania Power & Light  
Company  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

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. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

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

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested

**ORIGINAL**

**PP&L**

**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

May 8, 1995

**RECEIVED**  
MAY 08 1995

**SECRETARY'S OFFICE**  
**Public Utility Commission**

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

Re: **Terri Morrow v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0139**

**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: Terri Morrow  
The Honorable Robert A. Christianson

139

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCUMENT  
FOLDER

Terri Morrow

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0139

---

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

Terri Morrow  
50 Woodview Drive  
Elizabethtown, Pennsylvania 17022

Dated this 8th day of May, 1995.



Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**DOCKETED**  
MAY 12 1996

Terri Morrow

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0139

---

**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 denies that it has requested a 58% rate increase.

As discussed below, the average overall increase is 11.7%; the impact on individual customers may vary by type and pattern of use. PP&L further denies that it has not been truthful about the requested increase in its written communications to customers. The March 27, 1995 letter referenced in the Complaint is truthful and, with the

additional explanation provided by PP&L to Complainant, is sufficient to accurately calculate the impact of the proposed increase upon Complainant's bill.

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:



Paul E. Russell  
Its Attorney

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

Dated: May 8, 1995  
at Allentown, Pennsylvania



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

R-00943271C 0140

W/00131271C  
APR 20 1995

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name ROBIN L. MCCOMSEY  
Street/P.O. Box 5849 PINE ST. Apt# \_\_\_\_\_  
City EAST PETERSBURG State PA Zip 17520  
County LANCASTER Home Telephone-Area Code (717) 560-5762  
Work Telephone-Area Code (717) 560-5762

DOCUMENT  
FOLDED

2. Which company does your complaint concern?

Name of Company PPEL

RECEIVED  
95 APR 11 AM 9:03  
PA. P. U. C.  
INFO. CONTROL DIV.

3. What is your complaint?

THE PROPOSED RATE INCREASE!  
I DO NOT FEEL IT IS RIGHT TO PROPOSE SUCH  
A HIGH RATE INCREASE. I WAS INFORMED THAT  
-UNDER MY PERSONAL SITUATION- MY MONTHLY  
BILL WILL BE INCREASED BY APPROX. \$15.00!  
THAT TO ME IS AN OUTRAGE!!! I AM A VERY  
CONSCIENTIOUS PERSON- RUNNING AROUND THE  
HOUSE, TURNING OFF LIGHTS AND APPLIANCES,  
ETC., NOT BEING USED. I FEEL I AM BEING  
PENALIZED FOR MY CONSERVATIVE EFFORTS SO  
PPEL CAN PUT MONEY IN THEIR- AS WELL AS THEIR  
EMPLOYEES- POCKETS!! WHY NOT JUST INCREASE  
(ACROSS THE BOARD) \$2.00 PER MONTH INSTEAD OF  
TARGETING THE GUY THEY DON'T EARN AS MUCH  
MONEY FROM!

(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?

\*TAKE THE CONCERNS OF THE "LITTLE GUY"  
INTO CONSIDERATION! \* WITH THE COST OF  
LIVING INCREASING - WHO NEEDS AN  
ADDITIONAL MONTHLY BURDEN, \$2.00 PER MONTH  
WOULD BE JUSTIFIABLE - BUT \$15.00! OUTRAGEOUS!

I FEEL THAT OUR SERVICE HAS NOT BEEN  
UPGRADED - SO WHY SHOULD WE PAY  
"SUBSTANTIALLY" MORE FOR THE "SAME OLD THING!"

(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.

Robin L. McComsey  
Signature of complaining person, or officer

4-11-95  
Date Signed

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

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: April 20, 1995

R-00953271C0140

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

~~REPORT~~  
DOCUMENT FOLDED  
FOLDER

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Robin L. McComsey. 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.

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: April 20, 1995

Robin L. McComsey  
Complainant

VS.

Pennsylvania Power & Light  
Company  
Respondent

DOCKETED  
APR 20 1995

Complaint Docket  
No: R-00953271C0140

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FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

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. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

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

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

KJR

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

FAX: 610/774-6726

ORIGINAL

May 8, 1995

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

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

RECEIVED

MAY 8 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Re: **Robin L. McComsey v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0140

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: Robin L. McComsey  
The Honorable Robert A. Christianson

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Robin L. McComsey :  
 :  
 v. : Complaint Docket  
 : No. R-00943271C0140  
 :  
 Pennsylvania Power & Light :  
 Company :  
 :

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**CERTIFICATION OF SERVICE**

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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

Robin L. McComsey  
5849 Pine Street  
East Petersburg, Pennsylvania 17520

Dated this 8th day of May, 1995.

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

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED

MAY 11 1995

Robin L. McComsey

v.

Complaint Docket  
No. R-00943271C0140

Pennsylvania Power & Light  
Company

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MAY 8 1995

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ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

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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 her personal use of electricity.

PP&L denies that Complainant is being penalized for conservation efforts. As discussed below, the rate design proposed in this filing is based upon the results of the Company's cost of service study.

DOCUMENT  
FOLDER

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:



---

Paul E. Russell  
Its Attorney

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

Dated: May 8, 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.

*Ray Suhocki*  
\_\_\_\_\_

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

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

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

FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

Please Print:

ORIGINAL

R-009 43271COMH

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RECEIVED  
95 APR 21 11:11:21  
INFO CONTROL  
PA P.U.C. DIV.

1. Your Name, Mailing Address and Telephone Number

Name Michael Ochs

Street/P.O. Box 1633 Scott St. Apt#

City Williamsport State PA Zip 17701

County Lycoming Home Telephone-Area Code (717) 326-2513

Work Telephone-Area Code ( )

DOCUMENT

FOLDER

2. Which company does your complaint concern?

Name of Company PP&L

DOCKETED  
APR 24 1995

3. What is your complaint?

PP&L should not receive the request rate hike on account  
of the following reasons, elaborated on in the attached public  
input testimony under the headings of

1. ~~IX~~ Insufficient information

2. ~~XII~~ Lack of PP&L Promotion of Energy-efficient appliances,  
compact fluorescent lights (CFLs), no participation in  
EPA "Green Lights" program, and insufficient demand-side  
management

3. ~~XIII~~ PP&L lacks participation in 38 of the 43 rebate offers  
nationally for commercial and industrial sector

4. ~~XIV~~ PP&L lacks cost-effective incentives for residential  
customer conservation of energy use.

5. ~~XV~~ Users should not bear the costs of investor decision to  
promote nuclear power

(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?

See attached public input testimony, in which my specific requests of the PUC are highlighted with a highlighter pen, and elaborated on in sentences that precede and follow the highlighted portion.

My requests are outlined in the accompanying material under sections 1-5. See 1-a to 1-h; 2-a to 2-d; 3-a; 4-a, 4-b; 5-a.

1. More adequate information

2. PP&L should participate in EPA Green Lights program and use Demand-Side Management, promote energy-efficient appliances and Compact Fluorescent Lights (CFLs)

3. Commercial and Industrial Users should be able to use more than 5 of the 43 rebate programs nationally in use.

4 and 5, see attached.

(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.

*[Handwritten Signature]*

*4-20-95*

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

R-00943271 (014)

To: PA PUC Adm. Law Judge, POBox 3265, Harrisburg Pa 17105-3265  
From: M. Cchs, 1533 Scott St., Williamsport Pa 17701  
Re: Complaint vs. PP&L rate hike proposal  
Date: 3 April 1995

1. Insufficient Information

1-a. I ask the PUC to insure that customers will not have to call or write the company to learn the reasons for the requested rate hike increase and its potential effect on one's bill. This information should be part of a mailing to all customers. Since company employees are given an 11x17 inch double-sided sheet of information on the rate hike (PP&L publication entitled "PP&L Today, Special Insert Rate Filing" Dec. 30, 1994), I ask the PUC to assure customers 1-b. they will be given an equal amount of information.

1-c. The March bill insert to PP&L customers ("Connect: The Link to Your Power Source") includes a misleading headline. It says: "We'd Like to Set the Record Straight: PP&L is not requesting a 20 percent rate increase for all residential customers." That headline and the table matrix and article imply that average rate increase is only 12%. Yet a large class of customers, those who, like myself, use less than 500 Kwh/month, will experience a rate hike higher than 20.7% (22.31% for 300 Kwh/mo or 23.84% for 200 Kwh/mo). I use 250 Kwh/mo and estimate my bill will increase by 23%. I should not have to call the company to learn that, but I did. I request the PUC to have the company individualize the anticipated new rate, the monetary change, and the percent increase for each and all customers, and include it when the rate hike proposal is announced to the customer. I further ask the PUC to require the PP&L company to display tables showing the effects on usage below the so-called minimum 500 Kwh/month, just as it shows for increments above 500 Kwh; surely those of us who use less than the 500 Kwh represent a large cohort or class of the more than 1 million PP&L customers and we should be given accurate information on the potential rate hike effects on our bills.

1-d. The PUC should require the PP&L 800-hotline customer representative operator to be able to inform callers of the time and place of these public input hearings. My inquiry this past week was left unanswered and I was told to call the PUC instead.

1-e. Absent any Williamsport city PP&L business office, I ask the PUC to have PP&L designate some local place where customers can walk in to receive the Supplement No. 50 to Tariff-Electric PA PUC No. 200. It should also be available at these public input hearings.

1-f. I ask the PUC to inform the PP&L customer about the criteria on which PP&L is being evaluated, and how it performs accordingly. For example, over the ten years or so since the last rate hike approval, what is the company's customer service performance (handling of customer complaints, handling of complaints about shut-offs, handling of collections)? Some state utility commissions require utilities to provide a "Performance Evaluation Plan" (PEP) that features certain performance evaluation indicators (e.g., accuracy in construction cost estimates, customer satisfaction, regional comparisons of residential rates, employee safety record, service reliability, among others); what are the standards in Pennsylvania?

Lastly, as regards my complaint about insufficient information, I note that after the company made a request for a rate hike, it then also asked for a decrease in the energy charge rate. These back-to-back requests on two separate matters, one a significant increase and one a relatively insignificant decrease, only serve to confuse the average customer, and I ask the PUC to require PP&L clarification in writing to customers in their monthly bill inserts, comparing the two and contrasting the two.

## 2. Conservation By Energy-Efficient Appliances, Compact Fluorescent Lights, the EPA Green Lights Program, and Demand-Side Management

To the best of my recollection and knowledge, the last time I saw a map of who the Green Lights participants were in the 29-county area that PP&L serves, there weren't any. And in the last written communication I had from a PP&L official, I was told PP&L was not an ally, nor a partner, nor an endorser, in the EPA Green Lights Program. Yet some 74 utilities nationally are allies.

This program, now in its 5th year, has 1600 participants committed to energy-efficient lighting upgrades in 5% of all US commercial and industrial floorspace, about 4.3 billion feet. This produces an energy cost saving of more than 80 million dollars annually, and annually 1.1 billion kilowatt hours are saved, and a reduction in pollution to the tune of 1.4 billion pounds of carbon dioxide (that is equivalent to removing 132,400 cars from the road---CO<sub>2</sub> is a culprit in that it is a greenhouse effect gas); 11.1 million pounds of sulfur dioxide (SO<sub>2</sub>, an acid rain component); and 5.0 million pounds of nitrogen oxide (NO<sub>x</sub>, a contributor to smog).

2-4. I urge the PUC to seek PP&L's voluntary ally enrollment in the EPA Green Lights Program, and to seek having the commonwealth being enrolled as a Partner. If they do not do this voluntarily, 2-5. I urge the PUC to require the utility and the state to become committed to the EPA Green Lights Program goals and objectives. Participation in a large scale, energy-efficient lighting program not only saves energy, it also significantly reduces pollution (air pollution, acid mine run-off, oil spills, natural gas leakage, toxic and nuclear waste, etc.).

(In the PP&L territory, lighting may represent 25% of the electricity used. If we could reduce electric lighting demand by  $\frac{1}{2}$ , we could reduce the demand for PP&L electricity by 12%. This is achievable!)

Just imagine if each of the one million customers installed one 23 watt CFL. Multiply 1m by \$67.00 to get some appreciation of the energy costs savings; 1m time 67 watts to see the wattage saved; 1m times 7.8 lbs equals the amount of sulfur dioxide emissions that are reduced; 1m time 4.1 lbs results in the amount of nitrogen oxide that is prevented (smog); and 1m times 1,072 lbs equals the amount of significantly less carbon dioxide emitted into the air.

R-00943271C0141

Many utilities are participating in successful lighting programs--- from information and education, financial incentive or market-pull programs, through collective efforts, and by market transformation or technology-push programs. For examples of such, just check those of Hydro Quebec, Pacific Gas and Electric, Central Maine Power Co., Madison Gas and Electric Co., various Northwest utilities, and Southern California Edison, among others. When Central Maine Power teamed up with the local Lions Clubs, who every October sell light bulbs door-to-door, the result was the sale of 90,000 CFLs in one week, enough bulbs to save over 81m kwh, and reduce demand by 5,100 kw. When the utility enabled customers to buy these energy-efficient lamps the following year with rebate coupons through one drug and two supermarket chains, over 171,000 CFLs were sold for less than \$4.00 each, saving the utility 8 megawatts of generating capacity, which over the life of the bulbs is a total energy savings of 88 million kilowatt hours. I use this "Operation Lightswitch" program from Maine just as one example of how utility-sponsored demand-side management (DSM) programs can provide customers with direct financial incentives to promote conservation by energy-efficiency. It reduces electric demand and thus postpones the need for new power plant construction, reduces pollution, and upgrades lighting.

2-c. I therefore ask PP&L to supplement their rate hike proposal with a voluntary enrollment in the EPA Green Lights Program. 2-d. Furthermore, I ask the PUC to postpone action on the proposal until Demand-Side Management strategies have been agreed upon by the Pa. Industrial Energy Coalition, the PUC and the Commonwealth Court.

3. PP&L Commercial and Industrial Utility Rebate Programs

3-a. According to a recent survey of about 150 USA utilities, and their participation in some 43 rebate programs for commercial and industrial users, PP&L is shown to have only 5 of the 43 programs. I ask the PUC to determine whether a rate hike is warranted for commercial and industrial users since PP&L offers so few rebate programs.

PP&L offers no lighting rebates, nor any for motors and drives, nor building envelopes. I will not read the 38 types of rebate programs PP&L does not offer, but refer you to the article which I attach to this testimony, the Energy Users News Matrix Guide to Commercial and Industrial Utility Rebate Programs, from the periodical Energy Users News, vol. 19, no. 8, August 1994, pp.38-39.

4. Residential Customer Conservation

4-a. I return to this theme, pointing out my request that the PUC rectify a situation wherein a PP&L customer is penalized with a higher rate increase if she/he tries to conserve energy and reduces their usage to below 500 kwh/month. There is also the apparant anomaly of being charged 8.30 cents per kwh for the first 200 kwh, and only 6.36 cents per kwh for each kwh over 200. Why can't it be the other way around (to encourage more conservation), or a flat fee per kwh, and what is the proposed change, and where is the financial incentive for the customer to conserve? I've reduced my consumption by about 1 kwh per week in 1994 compared with 1993, kept my consumption about 250 kwh/month, or less than 3000 kwh/year. I could do more but a savings of only \$3.30 a year is a slow pay-

4-b. back on an investment in an energy-efficient lamp I paid more than \$4.00 for. So I return to the issue mentioned earlier, asking the PUC to have PP&L provide incentives to customers to purchase CFLs, and disallow any residential rate hike until this is achieved.

#### 5. Nuclear Power Issue within PP&L

5-a. In round figures, PP&L has underestimated the cost of decommissioning its nuclear plant by 50 million dollars per year since 1985. In 1985 it was to be about 250 m, now ten years later it is about 750 m, a difference of about 500 m over 10 years. If these cost estimates continue to be underestimated, adding 50 m per year over the next 30 years to the year 2025, it will cost 2½ billion dollars to just demolish that plant. Nuclear power, we all remember from the 1950s, was to be electricity that was to be too cheap to meter. Many in the audience are old enough to recall that advertisement. And many of us are here tonight who are young enough to recall the opposition to the Susquehanna Nuclear Plant. We did not want it then, and we would have voted "No!" against it if we were given the chance to democratically decide. We still don't want it, and I ask the PUC not to pass on the cost of its decommissioning to the customers.

Thank you for your attention to my requests, and I look forward to hearing your response.

#### BIBLIOGRAPHY

- "Green Lights' Fourth Anniversary: Over 1600 Reasons to Celebrate." Green Lights Update, March 1995. 401 M St., SW, Wash DC 20460.
- "The Mississippi Rate-Making War." Public Utilities Fortnightly, April 13, 1989, pp. 49-52.
- "Utilities: Steps to Successful Lighting Programs." By Gary B. Fernstrom, in Home Energy: The Magazine of Residential Energy Conservation. Vol. 11, no. 6, Nov/Dec 1994, pp. 27-33.
- "Energy User News' Matrix Guide to Commercial and Industrial Utility Rebate Programs." Energy User News, vol. 19, no. 8, Aug. 1994, pp. 38-39.
- "Outlaw Lighting." By Harvey Bryan. In P/A Progressive Architecture, December 1994, pp. 78-81.





R-0094327/60141

4 Apr 95

104th Year, No. 94

Williamsport, Pa. 17701



PUBLIC UTILITY COMMISSION STAFF MEMBERS LISTEN TO AREA RESIDENTS' TESTIMONY during Pennsylvania Power and Light Co.'s rate hike request hearing Monday night

At South Side PUC Hearing

PP&L Rate Hike Blasted

By JAMES P. BARR Sun-Gazette Staff

"I don't know where the extra money is going to come from."

Those few words, uttered repeatedly, sum up the majority of testimony at a public hearing on the Pennsylvania Power and Light Co.'s proposed electricity rate increase Monday night at the First Ward Fire Co. hall in South Williamsport.

About 50 area residents turned out for the session, the fifth of nine the state Public Utility Commission is holding to get public comments on the rate-hike request.

PP&L has asked the PUC to approve an overall 11.7-percent increase in rates charged its 1.2 million customers in eastern and central Pennsylvania. The hike — the first the company has sought since 1985 — would generate \$261 million in revenue annually.

The company projects home electric bills would increase between \$9 and \$17 a month on average. Industrial and commercial rates also would rise.

Many who testified were retirees on fixed incomes. They told Robert Christianson, the PUC administrative law judge who presided, that they could be forced to choose between buying groceries and paying their electric bills.

Others said the proposed



DEMONSTRATING HIS POINT, Michael Ochs of Williamsport holds an energy-saving, compact fluorescent light during testimony at a public hearing on Pennsylvania Power and Light Co.'s rate hike request. Ochs complained PP&L should not receive a rate hike unless it does more to promote energy conservation.

rates would hit poor people the hardest, because the less power used, the bigger the percentage of increase. That also discourages energy conservation, it was pointed out.

About half of those attending raised their hands when a PUC official asked how many were

members of the American Association of Retired Persons.

"Seniors on fixed incomes can't afford this increase," said James Stroup, president of the local AARP chapter. "It's really going to strap me to come up

(Continued on Page 8, Col. 1)

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OVER

# Area Residents Blast Rate Increase During Hearing

(From Page One)  
with that increase."

"I thought I was doing pretty good on Social Security," Mrs. Josephine Monno of Montoursville told PUC officials, "but with this increase. . . I don't know where the money is going to come from."

Stanley Gramko, president of Hope Enterprises Inc., said the rate hike would be doubly hard on his organization's mentally retarded and physically handicapped clients.

First, it would greatly increase costs of operating the agency's workshop and 26 group homes, Gramko said. State funding for the organization has increased only 2 percent a year for the past 10 years, he noted.

In addition, "99 percent" of Hope clients are low-income, meaning those who live independently would have a difficult time paying higher electric bills, he said.

On a personal level, Gramko complained that he paid extra to install off-peak storage electric heat in his home to save money. Now, PP&L wants to raise the off-peak rate 38 percent, he said.

Working people will find it difficult to fit a large increase in electric costs into their budgets, too, several people testified.

"I'd like the folks at PP&L to tell me where I'm going to get this extra 20 percent," said James G. Thomas of South Williamsport, referring to the fact that the increase would be about 20.7 percent for those who use fewer than 500 kilowatt-hours of electricity per month.

Thomas, who is self-em-

ployed, said he cut cable television service, reduced lighting in his house and trimmed every other expense to get his business up and running. Now, he said, PP&L wants to charge him more for using less.

"Those of us who try to conserve are getting hit with the highest rate," he complained.

PP&L officials did not testify at the hearing. But documents issued by the company say the rate-hike request is based on what it costs to deliver power to various classes of customers.

It costs more to provide power to a home that uses 500 kwh per month than to another home with electric heat using 2,500, the company explained.

Michael Ochs of Williamsport, a local environmentalist, said the rate hike would not just be hard economically, it is bad environmental policy as well.

Brandishing a compact fluorescent light bulb, which generates the same amount of light as a standard incandescent bulb for less than a third of the energy, Ochs claimed PP&L is not doing enough to encourage customers to save electricity and reduce pollution from coal-burning power plants.

He said the utility offers only five of 43 possible rebate programs available nationwide to encourage energy conservation. He asked the PUC not to approve the company's rate increase until it expands its range of energy-saving offerings.

In addition, Ochs said, the commission should not approve the increase until PP&L and the

state government enroll in the U.S. Environmental Protection Agency's "Green Light" program, which helps high-volume users convert to fluorescent lighting and other electricity-saving systems.

He also complained that PP&L's proposal would force ratepayers to pay an additional \$50 million a year into a fund for decommissioning the company's Susquehanna nuclear power plant at Berwick. Stockholders should bear the burden of closing the plant after its useful life is over, he said.

Donald McKee of Williamsport argued that PP&L's stockholders would be the biggest beneficiaries of the rate increase. The \$261 million in annual revenue the hike would produce is exactly the amount that PP&L paid in dividends on its common stock last year, he said.

While PP&L's profits have declined over recent years, its dividend payments have continued to increase, McKee said.

Christianson said the PUC will take everyone's testimony into account. It will examine the amount of the requested increase, the way it is structured for different customer categories and whether the expenses calculated into it should be passed on to ratepayers.

He said the agency probably will issue its decision in late summer, and that decision is likely to be appealed by PP&L or some other party before the rate hike is implemented.

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

DATE SERVED: April 24, 1995

R-00943271C0141

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

DOCUMENT  
FOLDER

Dear Mr. Russell:

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

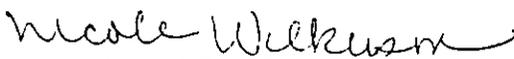
An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

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: April 24, 1995

Michael Ochs  
Complainant

DOCKETED  
APR 24 1995

VS.

Complaint Docket  
No: R-00943271C0141

Pennsylvania Power & Light  
Company  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

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. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

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

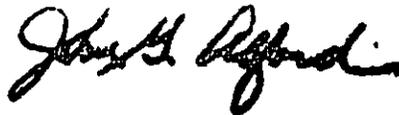
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested

**ORIGINAL**



**Pennsylvania Power & Light Company**

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

DOCUMENT  
FOLDER

May 15, 1995

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

RECEIVED  
MAY 15 1995

SECRETARY'S OFFICE  
Public Utility Commission

Re: **Michael Ochs v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0141

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. Michael Ochs  
The Honorable Robert A. Christianson

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCUMENT  
FOLDER

Michael Ochs

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0141

**DOCKETED**  
MAY 18 1995

**RECEIVED**  
MAY 15 1995  
SECRETARY'S OFFICE  
Public Utility Commission

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

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

1. Admitted.
2. Admitted.
3. Denied. The information provided by PP&L regarding the

December 30, 1994 filing was more than sufficient and was in full compliance with all regulations of the Pennsylvania Public Utility Commission ("PUC" or the "Commission"). Complainant's proposals are not required by the Commission's regulations; are not necessary; and would be unreasonably expensive to implement.

By way of further answer, PP&L's Demand-Side Management (DSM) programs are consistent with all of the Commission's DSM policies and orders; are cost-effective; and are appropriate for its present system conditions. PP&L reviews, on an on-going basis, participation in additional DSM programs, including many of the programs cited by Complainant.

It is denied that a PP&L customer who conserves energy is "penalized" with a higher rate increase. The design of Rate Schedule RS proposed by the Company in this filing reflects the results of PP&L's cost allocation study and is fully supported by the information submitted in the December 30, 1994 filing. Moreover, in absolute dollars, the proposed increase for residential customers at low consumption levels is less than the proposed increase for residential customers at higher consumption levels.

By way of further answer, the cost to decommission the Susquehanna plant is fully supported by the decommissioning cost study submitted as a part of the Company's filing; is a necessary, prudent and proper cost of doing business; and should be allowed, in its entirety, by the Commission.

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:



---

Paul E. Russell  
Its Attorney

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

Dated: May 15, 1995  
at Allentown, Pennsylvania





FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

RECEIVED  
95 APR 24 AM 9:50  
PA. P. U. C. DIV.  
INFO. CONTROL

Please Print: ORIGINAL R-00943271C0142  
110500

1. Your Name, Mailing Address and Telephone Number

Name Betty J Schermery

Street/P.O. Box 1111 Chestnut Street Apt#

City Montoursville State Pennsylvania Zip 17754

County Lycum Home Telephone-Area Code (717) 368-8849

Work Telephone-Area Code ( ) Gettysburg

2. Which company does your complaint concern?

Name of Company Pennsylvania Power and Light

3. What is your complaint? (ANOTHER PEN)

These great power plants - P.P.+L. lied about how they were suppose to generate so ooo much power. They are going to sell us out to bigger cities who can afford to pay them big bucks. The neighbors should go to gether and generate our own sophisticated power systems and tell P.P.+L. to go to —. The power plants are deteriorating and need alot of repair. P.P.+L. thinks the public is stupid. 11.7% increases are they crazy nobody gets an increase of that magnitude.

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

DOCUMENT FOLDER  
(-over-)

APR 25 1995

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

DON'T ALLOW THEM TO RAISE  
THE PRICE OF ELECTRICITY PERIOD

(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.

Betty J. Schenck

4-21-95

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: April 25, 1995

R-00943271C0142

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

DOCUMENT  
FOLDER

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Betty J. Schemery. 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.

R-00943271C0142

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,

*Nicole Wilkerson*  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: April 25, 1995

Betty J. Schemery  
Complainant

VS.

Complaint Docket  
No: R-00943271C0142

Pennsylvania Power & Light  
Company  
Respondent

DOCUMENT FILED  
APR 25 1995

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pennsylvania Power & Light Company

DOCUMENT  
FOLDER

**TAKE NOTICE:**

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

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

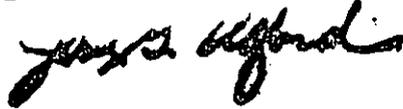
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

**ORIGINAL**

May 15, 1995

**DOCUMENT  
FOLDER**

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

**RECEIVED**

**MAY 15 1995**

**PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU**

**Re: Betty J. Schemery v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0142**

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. Betty J. Schemery  
The Honorable Robert A. Christianson

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**DOCKETED**

MAY 18 1995

Betty J. Schemery

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0142

**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. All of PP&L's generating plants perform extremely well.

Moreover, the revenue that PP&L receives for the sale of energy to other utilities is reflected as a credit to customers through the Company's Energy Cost Rate (ECR).

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: May 15, 1995  
at Allentown, Pennsylvania





FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0143

KJR

Please Print:

RECEIVED  
95 MAY 11 AM 8:52  
PA. P. U. C. DIV.  
INFO. CONTROL DIV.

1. Your Name, Mailing Address and Telephone Number

Name George E. Grossmann  
Street/P.O. Box 5 Fawn Ct. Apt# \_\_\_\_\_  
City Mountaintop State Pa Zip 18707  
County Luzerne Home Telephone-Area Code (717) 474-6818  
Work Telephone-Area Code (717) 831-0100

DOCKETED

MAY 15 1995

2. Which company does your complaint concern?

Name of Company PP+L (Pennsylvania Power & Light)

3. What is your complaint?

DOCUMENT

FOLDER

The rate increase by PP+L discriminates against customers with a Residential Thermal Storage rate. In March 27 letter from PP+L shows RTS customers will get a 58% rate increase for kWh charges vs only a 6-10% rate increase for traditional customers. RTS customers were convinced originally by PP+L to put the RTS system in by a substantially lower elect charge. By now however, RTS rates substantially more, the justification for the RTS has deteriorated. This is grossly unfair, as the RTS system costs over \$10,000 extra in a typical house (over use more). Rate increases should be the same for both, so 10%.

(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?

Decrease the R T S rate ~~increase~~ increase to  
be more than the rest of elect residential  
customers are getting.

(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.

George E. Grossmann

April 6, 1995

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name n.a.

Street \_\_\_\_\_

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

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

R-0094 327100143

PUC

800 692-7380

AP 5 - RECEIVED  
BILL  
MAY 11 AM 8:52  
PA. P. U. C. DIV.  
CONTROL DIV.



# Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5155

April 4  
Scrant. / UB

✓  
Les Williams  
will call

March 27, 1995

April 5  
Hartford

Dear Customer:

You have probably heard that PP&L has proposed to raise base electric rates for the first time in 10 years. I would like to take this opportunity to provide you with some background on the reasons for requesting this increase and to show how it might affect you.

On December 30, 1994, PP&L filed a request for an electric rate increase with the Pennsylvania Public Utility Commission (PUC). The decision to request this increase was a difficult one, but after 10 years of rising costs, it was a decision PP&L could no longer avoid. Any increase granted would take effect in October.

Over the past decade we have worked hard to keep electricity prices stable. During this 10-year period, electricity bills have lagged far behind the rate of inflation. The cost of living, as measured by the Consumer Price Index, has increased 30% in this period. We have taken many steps to avoid rate increases including refinancing high-cost securities, staff reductions, early retirements and other aggressive cost-cutting measures. However, this has not been enough to completely offset the increasing cost of providing you with high quality electric service.

We would like to assure you that, in filing this request, we have made every effort to allocate costs fairly to all classes of customers. We carefully considered the rates charged to our various classes of customers and made every effort to make sure those rates matched our cost of serving those customers.

We would also like you to know that we have stepped up our efforts to help customers on fixed incomes and those who are having a hard time paying their bills.

Regarding the Residential Thermal Storage (RTS) rate which affects you, we are proposing changes to the three main components as follows:

COMPONENT	CURRENT	PROPOSED
Monthly Charge	\$10.95	\$15.00
Billing Demand (In Excess of 2 KW On-Peak)	\$ 5.80 per KW	\$ 6.50 per KW
Cost Per Kilowatt-Hour	\$ .0284 per KWH	\$ .045 per KWH

37%  
12%  
58% ! .00

The effect of these proposed changes on your electric bill will depend on your monthly kilowatt-hour (KWH) use and on-peak billing demand. For example, an RTS customer with a 6 kilowatt (KW) monthly billing demand who uses 25,000 KWH a year could expect their electric bill to increase about \$20.00 a month or 16%.

$710 - 1125 = 415 / 12 = \$35 / mo$

You and other Residential Thermal Storage customers are important to PP&L and we appreciate your business. If you have any questions concerning this rate increase, please call us toll-free at 1-800-DIAL-PPL (1-800-342-5775).

43,000 KWH/yr  
\$1221 1995  
 $\Delta = \frac{714}{12} = \$60 / mo$

Sincerely,  
  
Gerald S. Farber  
Manager-Sales & Account Management

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

DATE SERVED: May 15, 1995.

R-00943271C0143

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

DOCUMENT  
FOLDER

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by George E. Grossmann. 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.

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,

*Nicole Wikerson*  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: May 15, 1995

DOCUMENT RECEIVED  
MAY 15 1995

George E. Grossmann  
Complainant

VS.

Complaint Docket  
No: R-00943271C0143

Pennsylvania Power & Light  
Company  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

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. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

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

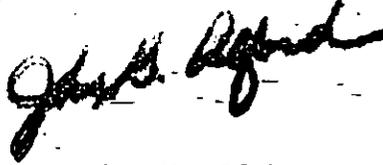
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

KJR

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

FAX: 610/774-6726

**ORIGINAL**

June 5, 1995

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

RECEIVED

JUN 06 1995

PUBLIC UTILITY COMMISSION  
SECRETARYS BUREAU

Re: **George E. Grossmann v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0143**

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. George E. Grossmann  
The Honorable Robert A. Christianson

**DOCUMENT  
FOLDER**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

George E. Grossmann

v.

Pennsylvania Power & Light  
Company

:  
:  
: Complaint Docket  
: No. R-00943271C0143  
:  
:  
:

---

**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

George E. Grossmann  
5 Fawn Court  
Mountaintop, Pennsylvania 18707

Dated this 5th day of June, 1995.

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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

George E. Grossmann

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0143

RECEIVED  
95 JUN -6 AM 8:29  
PA. P. U. C.  
INFO. CONTROL DIV.

---

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. The rate increase proposed by PP&L does not discriminate against customers receiving service under Rate Schedule RTS. The Company is proposing an average overall increase for Rate Schedule RTS of approximately 16.7%, not the 58% cited in the Complaint. The March 27, 1995 letter provides information regarding only proposed changes to base rates; it does not reflect pro-

DOCUMENT DOCKETED  
JUN 06 1995  
FOLDER  
- 1 -

posed changes to the Energy Cost Rate (ECR), the State Tax Adjustment Surcharge (STAS) or the Special Base Rate Credit Adjustment (SBRCA).

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.

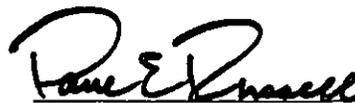
4. This paragraph constitutes a prayer for relief to which no answer is required.

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:



Paul E. Russell  
Its Attorney

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

Dated: June 5, 1995  
at Allentown, Pennsylvania



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

R-00943271C0144

Please Print:

ORIGINAL

RECEIVED  
95 MAY 12 AM 10:11  
PA. P. U. C. DIV.  
INFO. CONTROL

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

Name City of Harrisburg - Mayor Stephen R. Reed

Street/P.O. Box City Government Center Apt#

City Harrisburg State Pennsylvania Zip 17101

County Dauphin Home Telephone-Area Code (      )

Work Telephone-Area Code ( 717 ) 255-3065

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

Name of Company Pennsylvania Power & Light

Docket No. R-94-3271  
Judge assigned: ALJ Christianson

**3. What is your complaint?**

The proposed rate hikes by Pennsylvania Power  
& Light will have a substantial and detrimental affect upon  
the electric bills incurred by the City and the rate hikes  
are unlawful in that they are unjust and unreasonable in  
contravention of the Public Utility Code.

DOCUMENT  
FOLDER

DOCKETED  
MAY 18 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?

The City of Harrisburg hereby requests

on behalf of itself and all other municipalities

similarly situated as an affected class of user

the ability to intervene in the ongoing proceeding

Docketed at R-94-3271 and for the PUC to investigate and refuse the rate requests of 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.

*[Handwritten Signature]*

5-11-95

Signature of complaining person, or officer

Date Signed

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

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

Lawyer's Name Andrew J. Giorgione, Deputy City Solicitor

Street City Government Center, 10 N. Second Street, Suite 402

City Harrisburg State PA Zip 17101

Telephone Number-Area Code ( 717 ) 255-3065

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

DATE SERVED: May 18, 1995

R-00943271C0144

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

DOCUMENT  
FOLDER

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Mayor Stephen R. Reed - City of Harrisburg. 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.

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,

*Nicole Wilkinson*  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: May 18, 1995

Mayor Stephen R. Reed - City  
of Harrisburg  
Complainant

VS.

Pennsylvania Power & Light  
Company  
Respondent

Complaint Docket  
No: R-00943271C0144

MAY 18 1995

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

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. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

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

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

KJR

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

FAX: 610/774-6726

**ORIGINAL**

June 5, 1995

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

**RECEIVED**  
95 JUN - 6 AM 8:28  
INFO. CONTROL DIV.  
PA. P.U.C. DIV.

**Re: City of Harrisburg -  
Mayor Stephen R. Reed v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0144**

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: Andrew J. Giorgione, Deputy City Solicitor  
The Honorable Robert A. Christianson

**DOCUMENT  
FOLDER**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

City of Harrisburg -  
Mayor Stephen R. Reed

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0144

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CERTIFICATION OF SERVICE

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RECEIVED  
95 JUN -6 AM 8:29  
PA. P. U. C.  
INFO. CONTROL DIV.

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

Andrew J. Giorgione, Deputy City Solicitor  
City of Harrisburg  
City Government Center  
10 North Second Street, Suite 401  
Harrisburg, Pennsylvania 17101

Dated this 5th day of June, 1995.



Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

City of Harrisburg -  
Mayor Stephen R. Reed

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0144

RECEIVED  
95 JUN -6 AM 8:30  
PA. P. U. C.  
INFO. CONTROL DIV.

---

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

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

1. Admitted.
2. Admitted.
3. Denied. PP&L does not have information or knowledge sufficient to respond to statements regarding the impact of the proposed rate increase upon Complainant.

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

DOCUMENT  
- 1 - FOLDER

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JUN 06 1995

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:



Paul E. Russell  
Its Attorney

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

Dated: June 5, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

ORIGINAL

Please Print:

R-0094-32710145

ORIGINAL

1. Your Name, Mailing Address and Telephone Number

Name Axel Johnson Metals, Inc. Represented by William C. Acton, President and Joseph A. Knecht, Director - Melting Operations

Street/P.O. Box 900 Hemlock Road, Morg. Bus. Park Apt# N/A

City Morgantown State PA Zip 19543

County Berks Home Telephone-Area Code (717) J.A. Knecht 336-6242

Work Telephone-Area Code (610) 386-6100

2. Which company does your complaint concern?

Name of Company Pennsylvania Power and Light (PP&L)

RECEIVED  
P.U.C. DIV.  
CONTROL  
-6 AM 8:27

3. What is your complaint?

The attached letter describes our concerns regarding PP&L's proposal to increase base electricity rates.

In summary, we believe the rate increase puts Axel Johnson Metals and other Pennsylvania manufacturers at an unfair disadvantage when competing against out - of - state and overseas competitors. We believe most manufacturers are under pressure to reduce their production costs and prices for their products. Axel Johnson Metals does not have the ability to simply "pass on" the increased costs associated with PP&L's proposed rate increase.

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?

- 1. Deny or severely limit PP&L's request to increase electricity rates.
- 2. Eliminate the automatic "pass on" of energy costs. Force PP&L to effectively control these costs by working with their suppliers or making significant changes in the way they generate electricity or source/obtain raw materials.
- 3. Indefinetly extend the "Economic Develop Initiatives Rider" or roll savings into base rates. This will keep Pennsylvania manufacturers competitive and encourage additional growth in Pennsylvania manufacturing jobs.

(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.

x. William C. Acton x [Signature]

x 5/22/95 / 5/22/95

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 TBD

Street \_\_\_\_\_

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

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



# AXEL JOHNSON METALS, INC.

R-00943271C0145

May 19, 1995

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

RECEIVED  
95 JUN - 6 AM 8:27  
PA. P. U. C.  
INFO. CONTROL DIV.

Dear Sir:

Axel Johnson Metals, Inc. would like to go on record as opposing the magnitude of Pennsylvania Power & Light Company's proposed rate increase. Axel Johnson owns and operates a high technology titanium manufacturing facility in Morgantown, Pa. We believe that the request is excessive when you consider that electric utilities already have a method for "passing on" cost increases by the "energy" charge that is in addition to their approved rate structure.

Very few businesses have the privilege of "automatically" passing on cost increases to their customers without challenge. In fact, in our industry, prices and profit margins have been declining for several years due to market pressures and increased off-shore competition.

Our company has managed to successfully compete in this environment and actually grow our business by focusing on continuous productivity and quality improvements. We have also been able to reduce costs by improving efficiencies and not by cutting or freezing wages and reducing our workforce. We have been able to reduce our electrical usage and costs per pound of product produced by using techniques such as "process mapping" and "re-engineering". These same management tools can and should be applied at public utility companies to become more competitive and actually reduce electricity costs.

Electricity represents a large portion of our production costs. The proposed rate increase will cost our company \$10,000 per month! Today, we are competing in a global economy. Axel Johnson Metals and other Pennsylvania manufacturers export several million dollars worth of products each year. We also face stiff competition from off-shore manufacturers. Rate increases anywhere near the proposed magnitude give our off-shore and out-of-state competition a competitive advantage.

10

R-00943271 C0145

Please also be aware that an important vehicle for helping Axel Johnson Metals and other manufacturers in PP&L's territory grow their businesses (and add high paying manufacturing jobs to the local economy) is the "Economic Development Initiatives Rider". If this rider were to go away, our electricity costs would increase by \$20,000 per month! We urge the commission to oppose any efforts to eliminate these riders. When economic development riders begin phasing out, we recommend that the current savings be rolled into the base rates. These types of initiatives have helped add manufacturing jobs to Pennsylvania's economy.

Thank you for considering our recommendations and taking time to understand our concerns. Please take action to keep Pennsylvania manufacturers competitive by significantly limiting PP&L's rate increase.

Respectfully,



William C. Acton  
President

cc: JAK, HRH, LAF

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

DATE SERVED: June 9, 1995

R-00953471C0145

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

DOCUMENT  
FOLDER

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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,

*Michelle Wilkerson*  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: June 9, 1995

Axel Johnson Metals, Inc.  
Complainant

VS.

Complaint Docket  
No: R-00953471C0145

Pennsylvania Power & Light  
Company  
Respondent

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FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

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. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

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

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

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

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

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

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



John G. Alford  
Secretary

(SEAL) -

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

OFFICIAL

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

KJ

FAX: 610/774-6726

June 29, 1995

RECEIVED

JUN 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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

RECEIVED

JUN 29 1995

**Re: Axel Johnson Metals, Inc. v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0145**

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

DOCUMENT  
FOLDER

Enclosures

cc: William C. Acton, President  
Joseph A. Knecht, Director-Melting Operations  
The Honorable Robert A. Christianson

RECEIVED

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Axel Johnson Metals, Inc.

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0145

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JUN 29 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 Robert A. Christianson  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

William C. Acton, President  
Joseph A. Knecht, Director - Melting Operations  
Axel Johnson Metals, Inc.  
900 Hemlock Road, Morgan Business Park  
Morgantown, Pennsylvania 19543

Dated this 29th day of June, 1995.



Paul E. Russell

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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JUN 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Axel Johnson Metals, Inc.

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0145

RECEIVED

JUN 29 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

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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 the details of its business operations, cost, financial performance or competitive position. 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

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FOLDER

DOCKETED  
JUN 30 1995

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: June 29, 1995  
at Allentown, Pennsylvania

