

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

R-00943271C0114  
110500

Please Print:

**ORIGINAL**

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95 MAR -2 AM 9:54

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

1. Your Name, Mailing Address and Telephone Number

Name Sandy Gausler  
Street/P.O. Box 2162 Michael Rd. Apt# \_\_\_\_\_  
City Napareth State Pa. Zip 18064  
County Northampton Home Telephone-Area Code (610) 746-0726  
Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

**DOCKETED**

MAR 03 1995

3. What is your complaint?

**DOCUMENT  
FOLDER**

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

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

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

(-over-)

32

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

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

Multiple horizontal lines for writing the response to question 4.

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

5. You must sign and date your complaint.

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

*Sander David*

*2/24/95*

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

Date Signed

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 6, 1995

R-00943271C0114

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

DOCUMENT  
FOLDER

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

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 6, 1995

DOCKETED  
MAR 03 1995

Sandy Gaugler  
Complainant

VS.

Complaint Docket  
No: R-00943271C0114

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

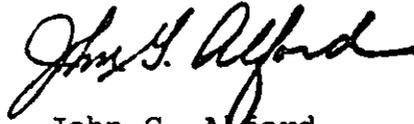
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

March 27, 1995

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



Re: **Sandy Gaugler v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0114

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. Sandy Gaugler  
The Honorable Robert A. Christianson

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MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Sandy Gaugler

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0114

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CERTIFICATION OF SERVICE

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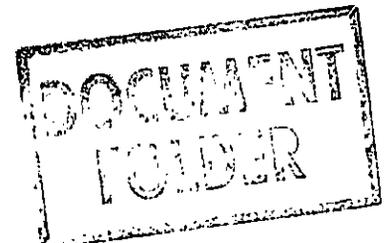
I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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

Ms. Sandy Gaugler  
2162 Michael Road  
Nazareth, Pennsylvania 18064

Dated this 27th day of March, 1995.

**DOCKETED**  
MAR 28 1995



  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Sandy Gaugler

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0114

**DOCKETED**  
MAR 28 1995

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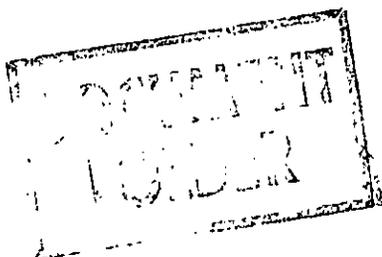
**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

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

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

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



**ORIGINAL**

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

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

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

KJR

R-00943271C0115  
110500

Please Print:

ORIGINAL

RECEIVED  
95 MAR -2 AM 9:54  
PA. P. U. C.  
INFO. CONTROL DIV.

1. Your Name, Mailing Address and Telephone Number

Name Shelley Glosek  
Street/P.O. Box 1613 TILGHMAN ST Apt#   
City ALLENTOWN State PA Zip 18102  
County LEHIGH Home Telephone-Area Code (610) 432-5412  
Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

DOCKETED  
MAR 03 1995

DOCUMENT  
FOLDER

3. What is your complaint?

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

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

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

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

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

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

5. You must sign and date your complaint.

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

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

2/24/95  
Date Signed

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 6, 1995

R-00943271C0115

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

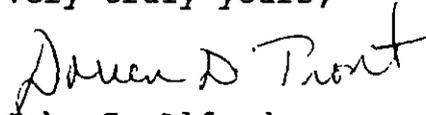
DOCUMENT  
FOLDER

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED  
MAR 03 1995

DATE SERVED: March 6, 1995

Shelley Glosek  
Complainant

VS.

Complaint Docket  
No: R-00943271C0115

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

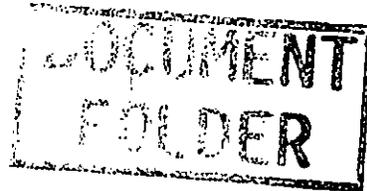
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 27, 1995

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



Re: **Shelley Glosek v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0115**

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. Shelley Glosek  
The Honorable Robert A. Christianson

**RECEIVED**

MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

**ORIGINAL**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Shelley Glosek

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0115

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CERTIFICATION OF SERVICE

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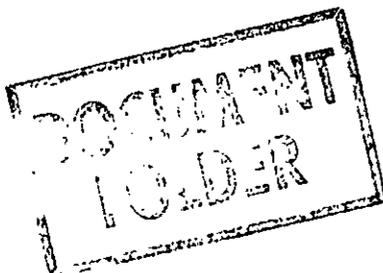
I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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

DOCKETED  
MAR 23 1995

Ms. Shelley Glosek  
1613 Tilghman Street  
Allentown, Pennsylvania 18102

Dated this 27th day of March, 1995.



  
Paul E. Russell

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Shelley Glosek

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0115

**DOCKETED**  
MAR 28 1995

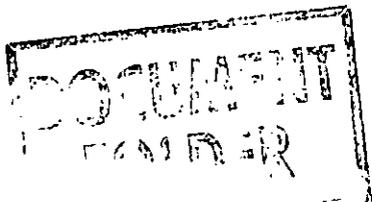
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**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

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

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



**ORIGINAL**

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

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

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



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

R-00943271C0116  
110500

Please Print:

**ORIGINAL**

**RECEIVED**

95 MAR -2 AM 9:54

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

1. Your Name, Mailing Address and Telephone Number

Name Judith a Echhoff  
Street/P.O. Box 19 E Spruce St Apt# \_\_\_\_\_  
City Emmaus State PA Zip 18049  
County Lehigh Home Telephone-Area Code (610) 965-4633  
Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

**DOCKETED**  
MAR 03 1995

3. What is your complaint?

**DOCUMENT  
FOLDER**

I urge you to deny PP&L's proposed 21% rate increase for residential  
customers. Customers who are already being pressed to the financial  
limit by job loss and declining real income will be hard put to handle  
such an exorbitant increase. And, in the end, everyone's taxes will  
rise to help pay the electric utility bills of those who, in increasing  
numbers, will no longer be able to pay on their own.

This is a grossly unfair "passing along" of expenses incurred through  
errors in judgement and/or poor planning. The customer should not be  
obligated to pay for business's mistakes. We, as customers, cannot  
comparison shop for our supplier of electricity nor can we pass along  
the cost of our mistakes to an unsuspecting "customer base." Business's  
continued resort to excuse-making and disregard for the customer will  
is greedy and sleazy. The customer doesn't deserve this latest outrage.

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



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

DATE SERVED: March 6, 1995

R-00943271C0116

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

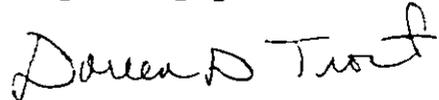
DOCUMENT  
FOLDER

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

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

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

Very truly yours,

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

for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 6, 1995

Judith A. Echhoff  
Complainant

VS.

Pa Power & Light Co  
Respondent

Complaint Docket  
No: R-00943271C0116

DOCKETED  
MAR 03 1995

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

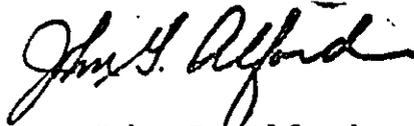
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

KJR

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

FAX: 610/774-6726

March 27, 1995

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



Re: **Judith A. Eckhoff v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0116

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. Judith A. Eckhoff  
The Honorable Robert A. Christianson

RECEIVED

MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Judith A. Eckhoff

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0116

**DOCKETED**  
MAR 28 1995

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**CERTIFICATION OF SERVICE**

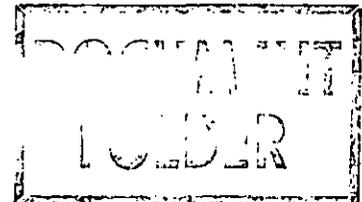
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I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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

Ms. Judith A. Eckhoff  
19 East Spruce Street  
Emmaus, Pennsylvania 18049

Dated this 27th day of March, 1995.



  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Judith A. Eckhoff

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0116

**DOCKETED**  
MAR 28 1995

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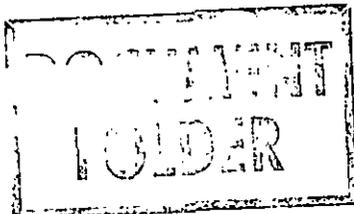
**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

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

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

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



**ORIGINAL**

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

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

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

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

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

ORIGINAL

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



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

R-00943271C0117  
110500

Please Print:

**ORIGINAL**

**RECEIVED**

95 MAR -2 AM 9:54

1. Your Name, Mailing Address and Telephone Number

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

Name John M Eckhoff

Street/P.O. Box 19 E. SPRUCE ST. Apt#

City EMMAUS State PA Zip 18049

County Lehigh Home Telephone-Area Code (610) 965-4633

Work Telephone-Area Code (610) 965-4633  
OUT OF WORK

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

**INDEXED DOCUMENT**  
**FOLDER**  
MAR 03 1995

3. What is your complaint?

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



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

DATE SERVED: March 6, 1995

R-00943271C0117

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

Dear Mr. Russell:

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

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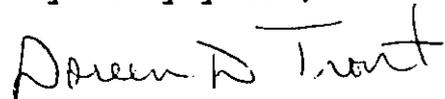
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Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 6, 1995

John M. Eckhoff  
Complainant

DOCKETED  
MAR 03 1995

VS.

Complaint Docket  
No: R-00943271C0117

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

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

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

DOCUMENT  
FOLDER

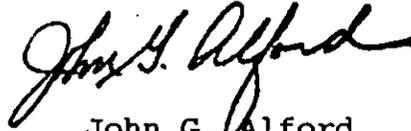
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4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held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

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John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

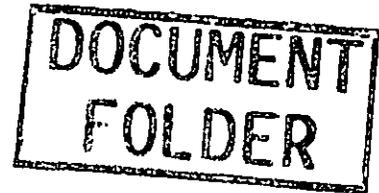
Paul E. Russell  
Associate General Counsel  
610/774-4254

FAX: 610/774-6726

KJR

March 27, 1995

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



Re: **John M. Eckhoff v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0117**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. John M. Eckhoff  
The Honorable Robert A. Christianson

**RECEIVED**

MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

**ORIGINAL**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

John M. Eckhoff

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0117

---

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):

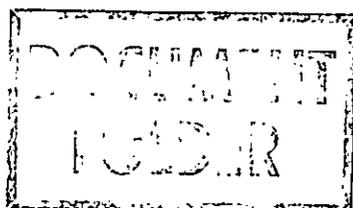
The Honorable Robert A. Christianson  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Mr. John M. Eckhoff  
19 East Spruce Street  
Emmaus, Pennsylvania 18049

Dated this 27th day of March, 1995.

**DOCKETED**  
MAR 28 1995

  
Paul E. Russell



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

John M. Eckhoff

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0117

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ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

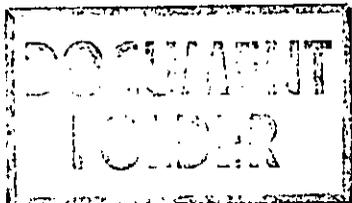
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**DOCKETED**  
**MAR 28 1995**

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

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

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



**ORIGINAL**

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

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

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

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

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

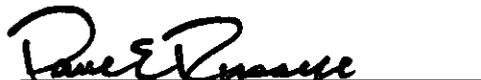
4. This paragraph constitutes a prayer for relief to which no answer is required.

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0118  
110500

Please Print:

ORIGINAL RECEIVED  
95 MAR -2 AM 9:55

1. Your Name, Mailing Address and Telephone Number

Name LORETTA A. EVANS

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

Street/P.O. Box 1511 QUARRY DR Apt# \_\_\_\_\_

City BETHLEHEM State PA Zip 18017

County NORTHAMPTON Home Telephone-Area Code (610) 866-4563

Work Telephone-Area Code (610) 820-4930

DOCKETED

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

MAR 03 1995

DOCUMENT  
FOLDER

3. What is your complaint?

I urge you to deny PP&L's proposed 21% rate increase for residential customers. Customers who are already being pressed to the financial limit by job loss and declining real income will be hard put to handle such an exorbitant increase. And, in the end, everyone's taxes will rise to help pay the electric utility bills of those who, in increasing numbers, will no longer be able to pay on their own.

This is a grossly unfair "passing along" of expenses incurred through errors in judgement and/or poor planning. The customer should not be obligated to pay for business's mistakes. We, as customers, cannot comparison shop for our supplier of electricity nor can we pass along our increased costs to customers we hold captive.

Enough is enough. Let business learn to live within its means.

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

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

Deny PP&L's request for a 21% rate increase on residential service.

Multiple horizontal lines for writing the complaint details.

(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.

*Louetta A. Brown*

*2/23/95*

Signature of complaining person, or officer

Date Signed

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

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 6, 1995

R-00943271C0118

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

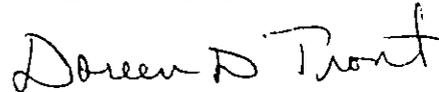
DOCUMENT  
FOLDER

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

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 6, 1995

DOCKETED  
MAR 03 1995

Loretta A. Evans  
Complainant

VS.

Complaint Docket  
No: R-00943271C0118

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

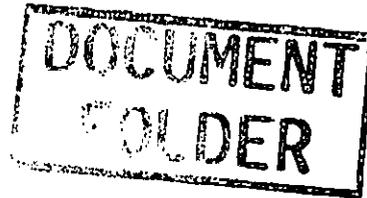
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 27, 1995

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



Re: **Loretta A. Evans v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0118**

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. Loretta A. Evans  
The Honorable Robert A. Christianson

**RECEIVED**

MAR 27 1995

**ORIGINAL**

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Loretta A. Evans

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0118

---

CERTIFICATION OF SERVICE

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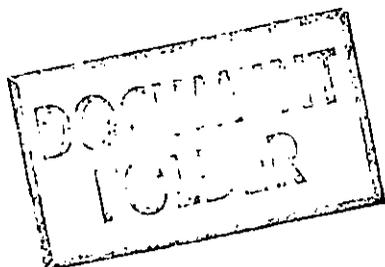
I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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

Ms. Loretta A. Evans  
1511 Quarry Drive  
Bethlehem, Pennsylvania 18017

**DOCKETED**  
**MAR 28 1995**

Dated this 27th day of March, 1995.



  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Loretta A. Evans

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0118

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ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

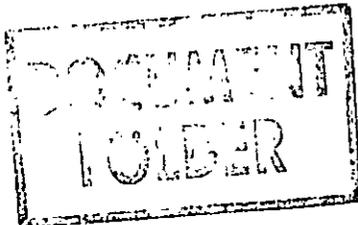
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**DOCKETED**  
MAR 28 1995

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

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

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



**ORIGINAL**

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

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

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

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

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

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

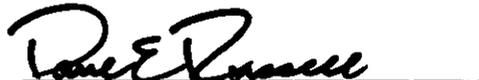
4. This paragraph constitutes a prayer for relief to which no answer is required.

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0119  
110500

Please Print:

ORIGINAL

RECEIVED  
95 MAR -2 AM 9:55  
PA. P. U. C.  
INFO. CONTROL DIV.

1. Your Name, Mailing Address and Telephone Number

Name R. T. CHMIELEWSKI  
Street/P.O. Box 4101 RAVENSWOOD RD Apt#  
City ALLENTOWN State PA Zip  
County LEHIGH Home Telephone-Area Code (610) 433-0697  
Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

DOCKETED  
MAR 03 1995

DOCUMENT  
FOLDER

3. What is your complaint?

I urge you to deny PP&L's proposed 21% rate increase for residential  
customers. Customers who are already being pressed to the financial  
limit by job loss and declining real income will be hard put to handle  
such an exorbitant increase. And, in the end, everyone's taxes will  
rise to help pay the electric utility bills of those who, in increasing  
numbers, will no longer be able to pay on their own.

This is a grossly unfair "passing along" of expenses incurred through  
errors in judgement and/or poor planning. The customer should not be  
obligated to pay for business's mistakes. We, as customers, cannot  
comparison shop for our supplier of electricity nor can we pass along  
our increased costs to customers we hold captive.

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

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

Deny PP&L's request for a 21% rate increase on residential service.

Lined area for writing the complaint details.

(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]*

*2/23/95*

Signature of complaining person, or officer

Date Signed

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

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 6, 1995

R-00943271C0119

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

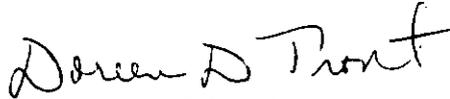
DOCUMENT  
FOLDER

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

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

Very truly yours,

  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 6, 1995

DOCKETED  
MAR 03 1995

R. T. Chmielewski  
Complainant

VS.

Complaint Docket  
No: R-00943271C0119

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

March 27, 1995

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

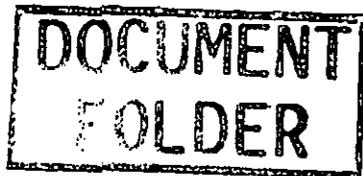
**DOCKETED**  
MAR 28 1995

Re: **R. T. Chmielewski v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0119

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: R. T. Chmielewski  
The Honorable Robert A. Christianson

**RECEIVED**

MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

**ORIGINAL**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

R. T. Chmielewski

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0119

---

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):

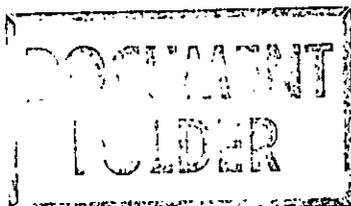
The Honorable Robert A. Christianson  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

DOCKETED  
MAR 28 1995

R. T. Chmielewski  
4101 Ravenswood Road  
Allentown, Pennsylvania 18103

Dated this 27th day of March, 1995.

  
Paul E. Russell



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

R. T. Chmielewski

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0119

---

ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

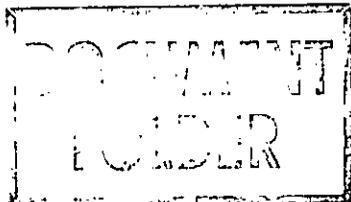
---

DOCKETED  
MAR 28 1995

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

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

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



ORIGINAL

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

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

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0120  
110500

Please Print:

ORIGINAL RECEIVED  
95 MAR -2 AM 9:55

1. Your Name, Mailing Address and Telephone Number

Name John Carey PA. P. U. C.  
INFO. CONTROL DIV.  
Street/P.O. Box 2087 Baker Dr. Apt#  
City Allentown State PA Zip 18103  
County Lehigh Home Telephone-Area Code (610) 791-5734  
Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

DOCKETED  
MAR 03 1995

Name of Company PP&L, ALLENTOWN, PA

3. What is your complaint?

DOCUMENT  
FOLDER

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

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

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

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

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

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

5. You must sign and date your complaint.

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

  
Signature of complaining person, or officer

2/27/95  
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: March 6, 1995

R-00943271C0120

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

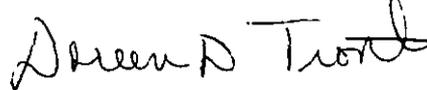
DOCUMENT  
FOLDER

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

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

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

Very truly yours, . . .



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 6, 1995

DOCKETED  
MAR 03 1995

Jolene Carey  
Complainant

VS.

Complaint Docket  
No: R-00943271C0120

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



Pennsylvania Power & Light Company

KJR

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

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

ORIGINAL

FAX: 610/774-6726

March 27, 1995

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

RECEIVED

MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Re: **Jolene Cary v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0120**

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. Jolene Cary  
The Honorable Robert A. Christianson

DOCUMENT  
FOLDER

142



ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED

MAR 31 1995

Jolene Cary

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0120

RECEIVED

ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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

1. Admitted.
2. Admitted.
3. Denied. 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 21% cited in the Complaint.

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

R-00943271C0121  
110500

Please Print:

ORIGINAL

RECEIVED  
95 MAR -2 AM 9:55  
PA. P. U. C.  
INFO. CONTROL DIV.

1. Your Name, Mailing Address and Telephone Number

Name W. J. Nassrff  
Street/P.O. Box 268 Apt# \_\_\_\_\_  
City Allentown State PA Zip 18105-0268  
County Lehigh Home Telephone-Area Code (610) 820-8350  
Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

DOCKETED  
MAR 03 1995

DOCUMENT  
FOLDER

3. What is your complaint?

I urge you to deny PP&L's proposed 21% rate increase for residential customers. Customers who are already being pressed to the financial limit by job loss and declining real income will be hard put to handle such an exorbitant increase. And, in the end, everyone's taxes will rise to help pay the electric utility bills of those who, in increasing numbers, will no longer be able to pay on their own.

This is a grossly unfair "passing along" of expenses incurred through errors in judgement and/or poor planning. The customer should not be obligated to pay for business's mistakes. We, as customers, cannot comparison shop for our supplier of electricity nor can we pass along our increased costs to customers we hold captive.

Enough is enough. Let business learn to live within its means.

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

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

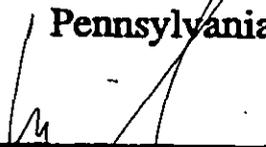
Deny PP&L's request for a 21% rate increase on residential service.

and if they must have the rate increase, it should be followed  
with a reliable service and the rate increase should be  
distributed evenly among the users of the service.

(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.



2/27/95

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 a telephone number.

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 6, 1995

R-00943271C0121

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

Dear Mr. Russell:

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

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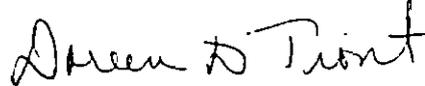
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FOLDER

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKETED  
MAR 03 1995

DATE SERVED: March 6, 1995

W. J. Nassoff  
Complainant

VS.

Complaint Docket  
No: R-00943271C0121

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

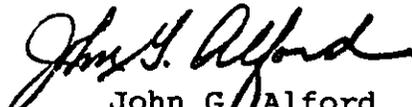
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



Pennsylvania Power & Light Company

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

KJR

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

FAX: 610/774-6726

March 27, 1995

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



Re: **W. J. Nassoff v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0121**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: W. J. Nassoff  
The Honorable Robert A. Christianson

RECEIVED

MAR 27 1995

ORIGINAL PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

W. J. Nassoff

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0121

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CERTIFICATION OF SERVICE

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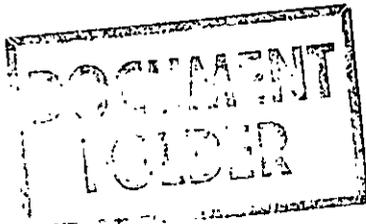
I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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

W. J. Nassoff  
P. O. Box 268  
Allentown, Pennsylvania 18105-0288

Dated this 27th day of March, 1995.

**DOCKETED**  
**MAR 28 1995**



  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

W. J. Nassoff

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0121

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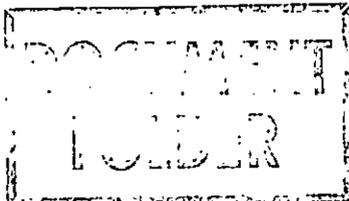
ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

---

**DOCKETED**  
MAR 28 1995

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

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



**ORIGINAL**

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

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

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

Please Print:

R-00943271C0122  
110500

ORIGINAL

KJR

RECEIVED

95 MAR -2 AM 9:55

1. Your Name, Mailing Address and Telephone Number

Name BETTY HENDEL

Street/P.O. Box 9340 TREXLER Apt# PA. P. U. C. INFO. CONTROL DIV.

City BREINIGSVILLE State PA Zip 18031

County LEHIGH Home Telephone-Area Code (610) 398-2965

Work Telephone-Area Code (610) 820-4930

2. Which company does your complaint concern?

Name of Company PP&L, ALLENTOWN, PA

DOCKETED

MAR 03 1995

DOCUMENT  
FOLDER

3. What is your complaint?

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

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

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

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

(-over-)

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

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

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

5. You must sign and date your complaint:

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

*Betty M. Handel*

*2-27-95*

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

Date Signed

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

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

Street \_\_\_\_\_

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

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

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

KJR

DATE SERVED: March 6, 1995

R-00943271C0122

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

Dear Mr. Russell:

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

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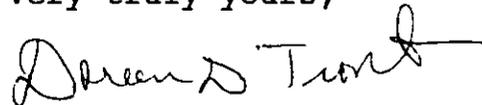
DOCUMENT  
FOLDER

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

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

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "John G. Alford", with a long horizontal flourish extending to the right.

for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 6, 1995

Betty Hendel  
Complainant

VS.

Complaint Docket  
No: R-00943271C0122

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCKETED  
MAR 03 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

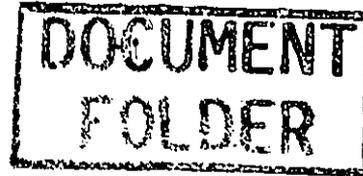
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 27, 1995

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



Re: **Betty Hendel v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0122

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 Hendel  
The Honorable Robert A. Christianson

**RECEIVED**

MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

**ORIGINAL**



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Betty Hendel

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0122

---

ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

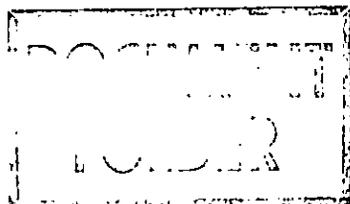
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**DOCKETED**  
MAR 28 1995

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

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

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



**ORIGINAL**

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

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

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



**ORIGINAL**

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

Please Print:

R-943271C0123  
110500

KJR  
RECEIVED  
95 MAR -3 AM 9:52  
INFO. CONTROL DIV.  
PA. P. U. C.

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

Name BARRY BEAN  
Street/P.O. Box PO BOX 53 Apt# \_\_\_\_\_  
City Bethlehem State PA Zip 18016  
County Berks/Northampton Home Telephone-Area Code (610) 683-8164  
Work Telephone-Area Code (610) 758-3678

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

Name of Company PA Power + Light rate increase request

**3. What is your complaint?**

Please see enclosed 2 pages.

DOCUMENT  
FOLDER

**DOCKETED**  
MAR 07 1995

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

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

DISALLOW Those portions of The rate increase based on:

a) Decommissioning Costs

b) Accumulation and Storage of Radioactive Material.

(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.

*Ray Bean*

27 Feb 1995

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

Date Signed

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

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

Street \_\_\_\_\_

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

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

RECEIVED  
95 MAR -3 AM 9:52  
PA. P.U.C.  
INFO. CONTROL DIV.

## DECOMMISSIONING COSTS

In their arguments in favor of construction of the Nuclear plant at Berwick, PP&L officials were adamant that decommissioning costs would be modest, and absolutely not exceed the figures projected. Those figures were previously allowed for inclusion as billable expenses to the ratepayers. It has been obvious for the entire time, and particularly since the costs of cleanup of Three Mile Island have been calculated, that PP&L's estimates of decommissioning have denied reality. However, it was a deliberate, deceptive, and self-serving strategy of the company to insist that the costs would be low. In a variety of contexts, including documents submitted to federal regulatory agencies, the PUC, ratepayers, and shareholders, and replies to direct questions on the subject, the company chose to "stonewall" with the unrealistically low projections for decommissioning costs. Now, it is only appropriate to respect and reaffirm the good faith agreement reached with the public on the basis of those false promises and projections.

Instead, as the plant ages, it serves the purposes of the company to admit to more realistic estimates of decommissioning costs, and to shift the burdens onto the ratepayers. Now, it seems, the company is eager to convince us that the earlier promises and calculations were mistakes. We are supposed to be sympathetic to the earlier denials and deceptions. We are supposed to set aside the agreements and negotiations made in good faith concerning decommissioning costs, and let the ratepayers suffer the consequences.

## RADIOACTIVE MATERIALS

Similarly, from the beginnings, the company has had very specific goals and limitations regarding the total amount of radioactive material to be present at the facility. The physical plans, location, environmental impact, evacuation and risk planning, as well as costs, have all been built on the premises put forward two decades ago. It was promised that waste disposal plans were adequate, and, in any case, would not become a further burden for the ratepayers. Now, it appears that these plans were also "optimistic", and that high-level radioactive wastes are being retained on site in far greater quantities than justified in earlier agreements and authorizations. If additional materials are to be stored on the grounds of the nuclear plant, serious and costly structural additions and changes in storage concepts and strategies are required. Again, the company wishes to change the rules, discard its previous promises and positions of "wisdom", and charge it to the customers. It is clear that earlier policies concerning waste disposal were based on wishful thinking and not particularly on clear analysis. The company assumed that government regulators and policymakers would protect the profitability of operation regardless of the inadequacy of plans for dealing with massive amounts of highly energetic waste material. Authorization for construction, and for accumulation and storage of additional amounts of radioactive material are not justified at this time. There have not been thorough or objective reviews of matters of health and safety, environmental impact, emergency planning, or long-term costs and consequences. Expansion of the total amount of radioactive material at the plant site should not be authorized, and certainly, no costs for such irresponsible plans should be passed along to the ratepayers.

95 MAR -3 AM 9:52  
PA. P. U.S.  
INTELLIGENCE CONTROL DIV.

RECEIVED

KJR

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

Date Served:

March 7, 1995

R-00943271C0123

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

DOCUMENT  
FOLDER

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

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

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

Very truly yours,

for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

March 7, 1995

DOCUMENT  
FOLDER

Barry Bean

Complainant

v.

Pennsylvania Power & Light Co.

Respondent

:  
:  
:  
:  
:  
:

Complaint Docket

No. R-00943271C0123

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pennsylvania Power & Light Co.

DOCKETED  
MAR 07 1995

**TAKE NOTICE:**

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

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

Section 1.56(a).

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

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

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

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

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

John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

March 27, 1995

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



Re: **Barry Bean v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0123**

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. Barry Bean  
The Honorable Robert A. Christianson

**RECEIVED**

MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

**ORIGINAL**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Barry Bean

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0123

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CERTIFICATION OF SERVICE

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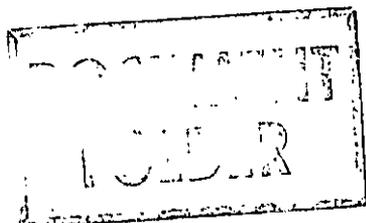
I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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

Mr. Barry Bean  
P. O. Box 53  
Bethlehem, Pennsylvania 18016

Dated this 27th day of March, 1995.

**DOCKETED**  
MAR 28 1995



  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Barry Bean

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0123

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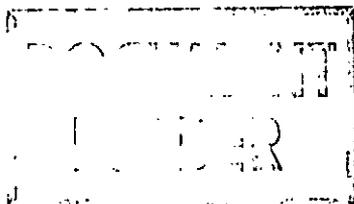
ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

---

**DOCKETED**  
**MAR 28 1995**

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

1. Admitted.
2. Admitted.
3. Denied. It is denied that PP&L's estimates of the cost of decommissioning the Susquehanna plant have "denied reality"; it is further denied that the Company has utilized "unrealistically low projections for decommissioning costs." It is denied that the Company has followed a "deceptive and self-serving" strategy regarding these estimates; it is further denied that PP&L chose to "stonewall" on this issue. By way of further answer, the expense to decommission Susquehanna is an



**ORIGINAL**

allowable cost of doing business that appropriately should be recovered from customers receiving benefits from the plant over its useful life. The level of decommissioning costs claimed in the Company's December 30, 1994 filing is just and reasonable; reflects prudent planning and operation of PP&L's system; and is fully justified by the information and data contained in the Company's December 30, 1994 filing.

It is denied that the Company's estimates regarding nuclear waste disposal were "based on wishful thinking." It is further denied that the Company's planning for nuclear waste storage and disposal was in any way inadequate or irresponsible. By way of further answer, the expense to store and dispose of nuclear waste is an allowable cost of doing business that should be recovered from customers. The level of nuclear waste storage and disposal costs claimed in the Company's December 30, 1994 filing is just and reasonable; reflects prudent planning and operation of PP&L's system; and is fully justified by the information and data contained in the Company's December 30, 1994 filing.

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



---

Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



FORMAL COMPLAINT FORM  
Pennsylvania Public-Utility Commission

ORIGINAL

Please Print:

(Letter)

R-94327/C0124

1. Your Name, Mailing Address and Telephone Number

Name MRS BETTY J. HUGHES

Street/P.O. Box 697 YELLOW HILL ROAD Apt#

City NARVON State PA Zip 17555

County LANCASTER Home Telephone-Area Code (717) 445-5227

Work Telephone-Area Code ( )

2. Which company does your complaint concern?

Name of Company P. P. & L.

RECEIVED  
95 MAR -7 AM 8:36  
PA. P. U. C.  
INFO. CONTROL DIV.

3. What is your complaint?

I feel a 10% average increase in my electric  
bill every month is a hardship, since I am on  
limited income (social security)

DOCUMENT  
FOLDER

MAR 7 1995

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

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

Please, do not ~~make~~ let P.P. & L  
increase so much!

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

3-4-95  
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  
PO BOX 3265, HARRISBURG, PA 17105-3265  
March 7, 1995

R-943271C0124

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

Dear Sir:

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

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

**CUSTOMER OF A UTILITY**

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

**COMPANY/UTILITY**

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

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

DOCUMENT  
FOLDER

DOCKETED

MAR 7 1995

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

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

Very truly yours,

for John G. Alford, Secretary

fao  
Attachment

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
March 7, 1995

---

MRS. BETTY J. HUGHES

---

Complaint Docket  
No. R-943271C0124

v.

PENNSYLVANIA POWER & LIGHT COMPANY

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: PENNSYLVANIA POWER & LIGHT COMPANY

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

DOCKETED  
MAR 7 1995

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

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

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

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

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

John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

March 27, 1995

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



Re: **Betty J. Hughes v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0124**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mrs. Betty J. Hughes  
The Honorable Robert A. Christianson

**RECEIVED**

**MAR 27 1995**

**PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU**

**ORIGINAL**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Betty J. Hughes

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0124

---

CERTIFICATION OF SERVICE

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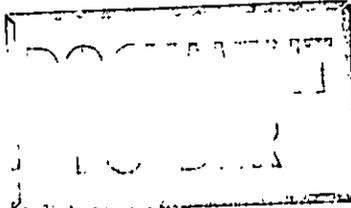
I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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

Mrs. Betty J. Hughes  
697 Yellow Hill Road  
Narvon, Pennsylvania 17555

Dated this 27th day of March, 1995.

**DOCKETED**  
MAR 28 1995



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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Betty J. Hughes

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0124

**DOCKETED**  
MAR 28 1995

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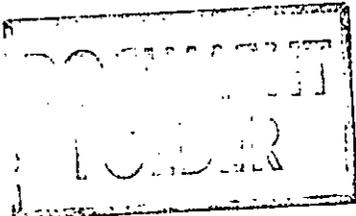
**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

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

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

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



**ORIGINAL**

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

Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



3-3-95

KJR

# Commission on Economic Opportunity

R-00943271C0125  
110500

211 SOUTH MAIN STREET  
WILKES-BARRE, PA 18701-1596  
(717) 826-0510  
1-(800) 822-0359  
FAX No.: (717) 829-1665

# ORIGINAL

February 28, 1995

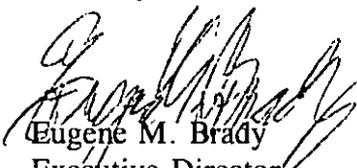
RECEIVED  
65 MAR - 9 AM 9:59  
PA. P.U.C. DIV.  
INFO. CONTROL DIV.

Judge Michael Schnierle  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Dear Judge Schnierle:

Attached, please find the original and 10 copies of the Formal Complaint Form filed by the Commission on Economic Opportunity RE: Docket #R-943271 via FAX February 28, 1995.

Sincerely,

  
Eugene M. Brady  
Executive Director

# DOCUMENT FOLDER

FORMAL COMPLAINT FORM

Pennsylvania Public Utility Commission

R-00943271C0125  
110500

ORIGINAL

RECEIVED  
95 MAR -6 AM 9:59  
PA. P.U.C. DIV.  
INFO. CONTROL DN.

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name COMMISSION ON ECONOMIC OPPORTUNITY

Street/P.O. Box 211 S. MAIN STREET Apt#

City WILKES-BARRE State PA Zip 18701

County LUZERNE Home Telephone-Area Code ( 717 ) 826-0510

Work Telephone-Area Code ( ) SAME

2. Which company does your complaint concern?

Name of Company PENNSYLVANIA POWER AND LIGHT COMPANY

3. What is your complaint?

The recently filed rate increase by the Pennsylvania Power and Light Company does  
not appear to be in the public interest, and in particular in the best interest of  
low income customers, as a result of the substantial and significant rate increase  
proposed.

DOCKETED DOCUMENT  
MAR 07 1995 FOLDER

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

(-over-)

95

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

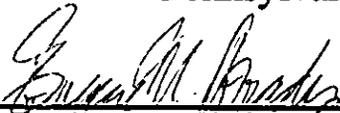
We request that the public interest, and in particular the interest of low income customers of PP&L, requires examination of the underlying justifications for the proposed rate increase to determine if it provides adequate assurance that the interests of low income customers will be protected.

Our organization would like the opportunity to take part in any and all hearings involving this rate increase as a formal complainant.

(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.



EUGENE M. BRADY, ASSISTANT SECRETARY

February 28, 1995

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

Date Signed

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

Lawyer's Name CHARLES PETRILLO, ESQUIRE

LEGAL SERVICES OF NORTHEAST PA., INC.  
410 BICENTENNIAL BLDG.

Street

City WILKES BARRE,

State PA

Zip 18701

Telephone Number-Area Code (717 ) 825-8567

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

DATE SERVED: March 8, 1995

R-00943271C0125

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

DOCUMENT  
FOLDER

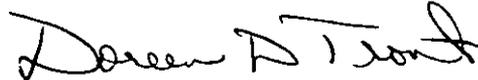
R-00943271C0125

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

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 8, 1995

Charles Petrillo, Esquire  
for Commission on  
Economic Opportunity  
Complainant

VS.

Pa Power & Light Co  
Respondent

Complaint Docket  
No: R-00943271C0125

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCKETED  
MAR 07 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

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

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

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

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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

KJR

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

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

FAX: 610/774-6726

March 27, 1995

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



**Re: Commission on Economic  
Opportunity v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0125**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Charles Petrillo, Esquire  
The Honorable Robert A. Christianson

**RECEIVED**

MAR 27 1995

**ORIGINAL** PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Commission on Economic Opportunity

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0125

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ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

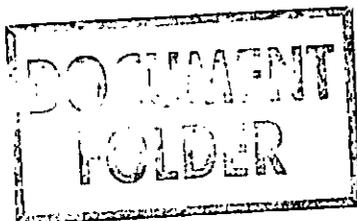
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DOCKETED  
MAR 28 1995

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

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

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



ORIGINAL

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

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

Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



# FORMAL COMPLAINT FORM

## Pennsylvania Public Utility Commission

R-00943271C0126  
110500

Please Print:

ORIGINAL

RECEIVED  
95 MAR - 0 AM 11:48  
PA. P. U. C.  
INFO. CONTROL DIV.

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

Name WILLIAM NEMETH  
Street/P.O. Box 2750 DAHL RD. Apt#  
City QUAKERTOWN State PA Zip 18951  
County BUCKS Home Telephone-Area Code (215) 536-3141  
Work Telephone-Area Code ( )

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

Name of Company P.P. & L.

### 3. What is your complaint?

A number of years ago the electric company gave us many reasons to go all electric in our home. The most convincing reason was special rates. This meant removal of gas stove and hot water heater. Then came the time they took this special rate away and now they want to add insult to injury by again increasing our rates. On top of that, we, the residential customers, will have a bigger increase than commercial customers.

DOCKETED  
MAR 07 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 PUC did nothing at the time when the special rates were done away with for total electric homes, therefore, eliminate the proposed increase for total electric homes or at least raise rate no more than for commercial users.

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

5. You must sign and date your complaint.

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

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

2-23-95  
Date Signed

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 8, 1995

R-00943271C0126

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

DOCUMENT  
FOLDER

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

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 8, 1995

William Nemeth  
Complainant

DOCKETED  
MAR 07 1995

VS.

Complaint Docket  
No: R-00943271C0126

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

TAKE NOTICE:

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DOCUMENT  
FOLDER

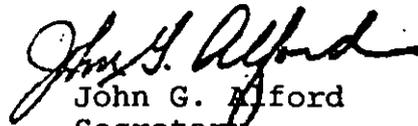
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

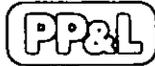
5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

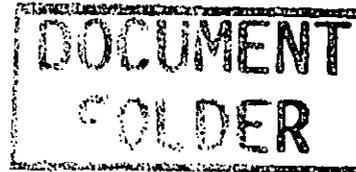
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 27, 1995

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



Re: **William Nemeth v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0126**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. William Nemeth  
The Honorable Robert A. Christianson

RECEIVED

MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

ORIGINAL



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

William Nemeth

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0126

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ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

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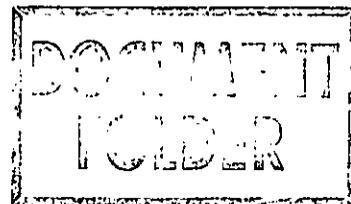
DOCKETED  
MAR 28 1995

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

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

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

ORIGINAL -1-



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

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

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

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

By way of further answer, from 1961 through January 30, 1981, PP&L offered a special rate, designated Rate RH, to qualifying all-electric homes.

On May 12, 1971, the Commission issued a Secretarial Letter at Docket No. C-19244 approving the Company's request to limit the application of

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

---

Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



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

KJR  
204

R-00943271C0127  
110500

RECEIVED  
95 FEB 27 AM 11:04

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

Please Print:

**ORIGINAL**

1. Your Name, Mailing Address and Telephone Number

Name ROBERT C KLEINTOP  
Street/P.O. Box RI Box 1220 Apt#  
City PALMERTON State Pa Zip 18071  
County CARBON Home Telephone-Area Code (610) 852 2797

**DOCKETED**  
MAR 07 1995

**DOCUMENT FOLDER**  
Work Telephone-Area Code ( )

RECEIVED  
95 MAR -3 AM 9:52  
PA. P. U. C.  
INFO. CONTROL DIV.

2. Which company does your complaint concern?

Name of Company PENNSYLVANIA POWER AND LIGHT

3. What is your complaint?

MY COMPLAINT IS PPL'S PROPOSED RATE INCREASE WHICH WAS FILED WITH THE PA. PUBLIC UTILITY COMMISSION. THE INFORMATION I RECEIVED FROM PPL PROPOSES A 20.7 PERCENT INCREASE FOR A RESIDENTIAL CUSTOMER USING 500 KILOWATT-HOURS PER MONTH WHILE A COMMERCIAL CUSTOMER USING 1500 KILOWATT-HOURS WOULD BE LOOKING AT A 2.4 PERCENT INCREASE. THE PROPOSED INCREASE FOR AN INDUSTRIAL CUSTOMER USING 400,000 KILO-WATT HOURS WOULD BE 9.1 PERCENT. I BELIEVE IT IS UNFAIR TO THE RESIDENTIAL CUSTOMER TO BE EXPECTED TO PAY A 20.7 PERCENT PER MONTH INCREASE WHILE LARGE CONSUMERS OF ELECTRICITY LOOK AT A MUCH SMALLER INCREASE PERCENTAGE-WISE. I HAVE ALSO ENCLOSED COPIES OF 2 LOCAL NEWSPAPER ARTICLES SHOWING A PPL DONATION OF \$10,000.00 TO GOO RIDGE'S INAUGURAL COMMITTEE. I BELIEVE IT IS UNFAIR THAT THE CONSUMER IS EXPECTED TO PAY SUCH A

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

SUBSTANTIAL INCREASE FOR ELECTRICITY WHILE PPL USES THE PROFITS TO CONTRIBUTE TO POLITICAL PARTIES. LET PPL SHAREHOLDERS WHO BENEFIT FROM DIVIDENDS PAID BY PPL DONATE THEIR MONEY FOR POLITICAL PURPOSES, NOT THE RESIDENTIAL CUSTOMER.

15

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

FIRST OF ALL, IF PPL DOES NEED AN INCREASE IN ELECTRIC RATES THE PUC SHOULD FIND OUT HOW MUCH PPL HAS DONATED TO POLITICAL PARTIES WHILE PLEADING FOR INCREASES FROM ITS CUSTOMERS AND WHAT EFFECT THIS HAS ON PPL REQUEST FOR AN INCREASE.

SECONDLY - I BELIEVE THE PUC SHOULD HOLD HEARINGS TO DETERMINE IF PPL REALLY NEEDS THIS LARGE INCREASE IN RATES, THEY HAVE RECENTLY CUT THEIR WORKFORCE IN ORDER TO BRING COSTS DOWN AND NOW CLAIM THEY NEED MORE MONEY.

THIRD - IF THE PUC DETERMINES THAT PPL DOES NEED A RATE INCREASE I DO NOT BELIEVE THE RESIDENTIAL CUSTOMER SHOULD RECEIVE THE LARGEST INCREASE. SHARE THE COST EQUALLY BETWEEN ALL CONSUMERS - LARGE AND SMALL

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

5. You must sign and date your complaint.

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

Robert C. Klumpp 3/1/95

Robert C. Klumpp

2-23-95

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

Date Signed

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

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

Street \_\_\_\_\_

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

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

# Classified/1

## Donations for Ridge's inaugural easily exceed fund raising goal

HARRISBURG (AP) —

Gov.-elect Tom Ridge's inaugural committee has easily exceeded its fund-raising goal and collected more than \$1.5 million, including contributions from many well-known companies.

Corporate and individual sponsors, kicked in \$980,200 and sales of tickets to inaugural events produced an additional \$570,000, said spokesman Steve Miskin. The goal had been \$1.25 million.

An inaugural finance committee handled the fund-raising and in many cases contributors contacted it unsolicited, Miskin said.

"There is a lot of enthusiasm and support for a new governor," he added. "People want to get involved."

Any surplus will be given to charity, Miskin said.

Ridge will be sworn in as Pennsylvania's governor on Tuesday.

The top corporate donor was D & L Realty, which gave \$50,000. The Ridge inaugural list did not say where the company was located, and no one was at the committee Tuesday night to answer questions.

The \$25,000 contributors included AFSCME, the largest of the state employees unions; Air Products; Allegheny Ludlum; American Water Works; AT&T; Blue Cross of Western Pennsylvania; General Electric; Rite Aid; U.S. Healthcare; and Waste Management Inc.

Other contributors: Republican National Committeeman Herb Barness of Bucks County, \$10,000; Gaming World Inter-

national; \$10,000; the Boeing Co., \$15,000; Cigna, \$10,000; Corestates Bank, \$10,000; Erie Insurance, \$10,000; Fulton Bank, \$2,500; Harsco, \$13,200; Hershey Foods, \$10,000; Hospital Association of Pennsylvania, \$10,000; Hospital Services Association, \$10,000; Independence Blue Cross, \$10,000; International Paper, \$10,000; Mellon Bank, \$10,000; Metropolitan Edison, \$10,000; Metropolitan Life Insurance, \$5,000; and National Fuel, \$5,000.

Also Dr. Julius Newman, husband of Commonwealth Court Judge Sandra Shultz Newman, \$10,000; Pennsylvania Cable Television Association, \$10,000; Pennsylvania Medical Society, \$10,000; Penn-

sylvania Power and Light Co., \$10,000; PECCO, \$10,000; Penn American Water Works, \$10,000; Penn Fuel Gas, \$10,000; Penn Mutual Life, \$12,500; Price Waterhouse, \$5,000; Rochester & Pittsburgh Coal, \$10,000; Rodale Press Inc., \$5,000; State Farm Insurance, \$5,000; Susquehanna Pfaltzgraff, \$10,000; Travelers, \$2,500; Union Pacific, \$10,000; United Food and Commercial Workers, \$10,000; Weaber Hardwoods, \$10,000; and West Penn Power Co., \$7,000.

The inaugural committee was not required to release the list but did so voluntarily.

The contributors are being given tickets to the inaugural functions, and, in some cases, special seating at the swearing-in and a private reception with Ridge and Lt. Gov.-elect Mark Schweiker.

# NOTICE OF PROPOSED RATE CHANGES

To Our Customers:

Pennsylvania Power & Light Co. is filing a request with the Pennsylvania Public Utility Commission (PUC) to increase your electric rates as of Feb. 28, 1995. This notice describes the company's rate request, the PUC's role and what actions you can take.

PP&L has requested an overall rate increase of \$261 million per year. If the company's entire request is approved, the total bill for a residential customer using 500 kilowatt-hours would increase from \$44.82 to \$54.12 per month, or by 20.7 percent.

The total bill for a commercial customer using 1,500 kilowatt-hours would increase from \$177.02 to \$181.32 per month, or by 2.4 percent.

Rates for an industrial customer using 400,000 kilowatt-hours would increase from \$27,116.27 to \$29,592.59 per month, or by 9.1 percent.

To find out your customer class or how the requested increase may affect your electric bill, contact PP&L toll-free at 1-800-342-5775 (1-800-DIAL PPL). The rates requested by the company may be found in Supplement No. 50 to Tariff-Electric Pa. PUC No. 200. You may examine the material filed with the PUC, which explains the requested increase and the reasons for it. A copy of this material is kept at your local PP&L business office. Upon request, PP&L will send you the Statement of Reasons for Supplement No. 50, explaining why the rate increase has been requested.

The state agency which approves rates for public utilities is the PUC. The PUC will examine the requested rate increase and can prevent existing rates from changing until it investigates and/or holds hearings on the request. The company must prove that the requested rates are reasonable. After examining the evidence, the PUC may grant all, some or none of the request, or may reduce existing rates.

THE MORNING CALL, SUNDAY, JANUARY 22, 1995

### D & L donates to party

Pennsylvania Power & Light Co. has the state Public Utility Commission approve a \$261 million rate hike. At the same time, PP&L found an extra \$50 million to donate to Ridge's inaugural celebration. Rep. Lisa Boscola, D-135th District, is troubled by this. "PP&L is being irresponsible by donating to the [inaugural] committee while at the same time attempting to justify the rate increase to the public," she said. "Many working families have had to tighten their belts to make it through the recession. PP&L should do the same."

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

DATE SERVED: March 8, 1995

R-00943271C0127

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

DOCUMENT  
FOLDER

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

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

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

Very truly yours,

  
for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 8, 1995

Robert C. Kleintop  
Complainant

VS.

Complaint Docket  
No: R-00943271C0127

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCKETED  
MAR 07 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

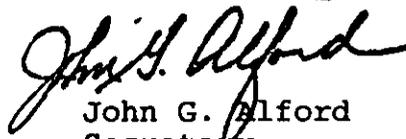
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

KJR

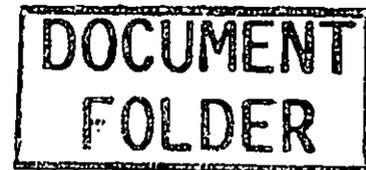
Paul E. Russell  
Associate General Counsel  
610/774-4254

FAX: 610/774-6726

**ORIGINAL**

March 27, 1995

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



Re: **Robert C. Kleintop v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0127

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

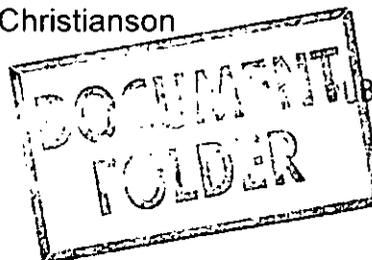
Enclosures

cc: Mr. Robert C. Kleintop  
The Honorable Robert A. Christianson

**RECEIVED**

MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Robert C. Kleintop

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0127

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CERTIFICATION OF SERVICE

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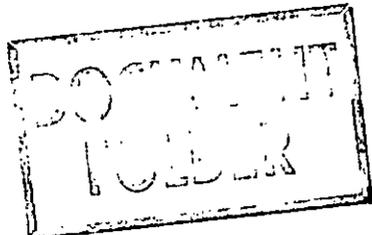
I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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

Mr. Robert C. Kleintop  
R1, Box 1220  
Palmerton, Pennsylvania 18071

**DOCKETED**  
**MAR 28 1995**

Dated this 27th day of March, 1995.



*Paul E. Russell*  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Robert C. Kleintop

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0127

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ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

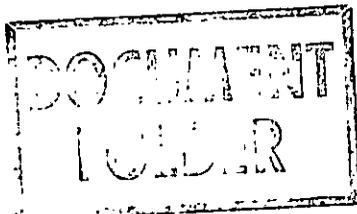
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**DOCKETED**  
**MAR 28 1995**

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

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

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



**ORIGINAL**

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

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

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

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

By way of further answer, all of the costs that PP&L incurs for political activities are paid by its shareowners; none of those costs are reflected in customer rates.

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

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

Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



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

**ORIGINAL**  
KJR

Please Print:

R-00943271C0128

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

Name STEVEN J. LONGOBARDI  
Street/P.O. Box 924 DOGWOOD LANE Apt# \_\_\_\_\_  
City CANADENSIS State PA Zip 18325  
County MONROE Home Telephone-Area Code (717) 595-0600  
Work Telephone-Area Code (516) 242-0330

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

Name of Company PP&L

**3. What is your complaint?**

THE 20.7% PROPOSED RATE INCREASE TO  
RESIDENTIAL USERS.

RECEIVED  
95 MAR -8 AM 9:29  
P.A. P.U.C.  
INFO. CONTROL DIV.

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

DOCUMENT  
FOLDER

(-over-)

**DOCKETED**

MAR 8 1995

3-6  
34

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

EXAMINE THE WAY THIS COMPANY DOES ITS BUSINESS TO  
DETERMINE WHY A 20.7% INCREASE IS NECESSARY.

ARE THEY MANAGING COST PROPERLY?

DO THEY HAVE EXCESSIVE NON-VALUE ADDED MANAGEMENT?

HOW MUCH MONEY GOES TO SHAREHOLDERS?

WHAT EFFORTS HAVE BEEN MADE TO CUT OPERATING COSTS?

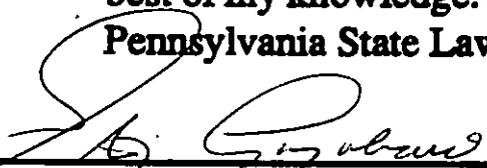
THESE ARE JUST SOME OF THE ISSUES THAT PPUC SHOULD  
ADDRESS BEFORE EVEN CONSIDERING SUCH AN INCREASE.

SEE LTR FROM S. LONGOBARDI DATED 2/9/95

(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.



3-6-95

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

R-00943271C0128

Steven J. Longobardi  
Rural Route 212A  
The Hamlet  
Canadensis, PA 18325  
February 9, 1995

Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

RECEIVED  
95 MAR - 8 AM 9:30  
PA. P. U. C.  
REG. CONTROL DIV.

Subject: Proposed rate increase by PP & L to raise residential service rates  
by 20.7 %

Dear Commissioner,

I am appalled that PP&L would be asking for a 261 million dollar increase, resulting in a cost impact of +20.7% to the residential user. I certainly hope that PPUC is not foolish enough to grant this increase, without careful *consideration on the financial impact to the average family.*

The enclosed card from PP&L down plays the impact by illustrating an example using 500 kilowatt- hours, resulting in a + \$9.32 increase. ( A typical residential house uses 500 kilowatt hours/ month just to run the refrigerator and outdoor night lights.)

When viewed at realistically, this cost increase will cripple the average homeowner, considering that many people in the state of Pennsylvania use electric power to heat their homes.

We are in hard economic times, with global competition forcing many companies to downsize and streamline the operation, along with freezing wages for their employees. A 20.7% increase to the average family will be intolerable from an economic standpoint. ( i.e "Capability to Pay" )

Utility companies like PP & L are not dealing with REAL competition found in the private sector, and therefore do not manage their operation in a manner which fosters improved performance at reduced costs.

Their intention to increase the Residential customer more than the Commercial customer, implies the larger user gets a break in the rate they pay. However, we are not dealing with a commodity in which people have a choice to buy bulk, such as "Price club" or other warehouses. We are dealing with a necessity !!!

Therefore, I officially take exception to this increase and request a hearing before a judge so that I can participate in evaluating how PP&L runs their business.

I currently run an Aerospace business, and consider myself a very prudent manager knowing how to perform in a highly competitive market. I am confident that cost reduction initiatives can be implemented at PP&L to prevent a 20.7 % increase to the residential user.

Please notify me with regard to the aforementioned.

Sincerely,



Steven J. Longobardi

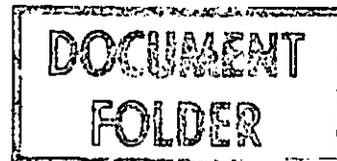
COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

Date Served:

March 8, 1995

R-00943271C0128

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



Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by **STEPHEN J. LONGOBARDI**. 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

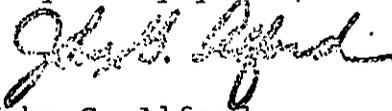
AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

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

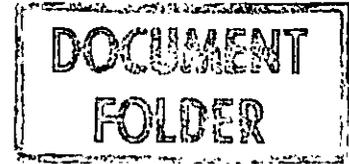
Very truly yours,

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

John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

March 8, 1995



STEPHEN J. LONGOBARDI  
Complainant

v.

PENNSYLVANIA POWER & LIGHT COMPANY  
Respondent

:  
:  
:  
:  
:

Complaint Docket  
No. R-00943271C0128

**DOCKETED**

MAR 8 1995

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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**

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

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

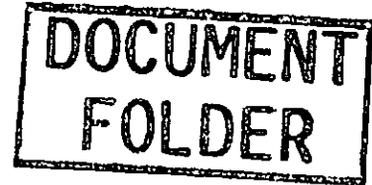
FAX: 610/774-6726

05 MAR 29 PM 12: 27

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

March 27, 1995

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



Re: **Stephen J. Longobardi v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0128

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. Stephen J. Longobardi  
The Honorable Robert A. Christianson

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Stephen J. Longobardi

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0128

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CERTIFICATION OF SERVICE

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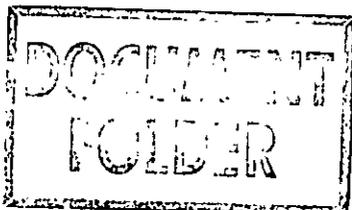
I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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

Mr. Stephen J. Longobardi  
924 Dogwood Lane  
Canadensis, Pennsylvania 18325

Dated this 27th day of March, 1995.

DOCKETED  
MAR 28 1995



  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Stephen J. Longobardi

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0128

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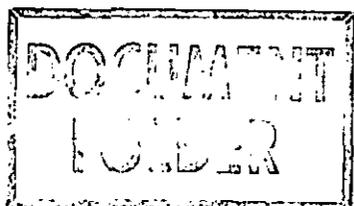
ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

---

**DOCKETED**  
MAR 28 1995

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

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



**ORIGINAL**

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

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

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

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

By way of further answer, PP&L has undertaken many initiatives to control its costs, including administrative costs. Those initiatives have helped the Company to maintain retail base rate stability for the last ten years. Moreover, one

such initiative, the Voluntary Early Retirement Program, has reduced the retail revenue requirements reflected in the Company's filing by approximately \$12 million.

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



**ORMAL COMPLAINT FOR**  
**Pennsylvania Public Utility Commission**

R-00943271C0129

RECEIVED  
95 MAR -9 AM 9:21  
PA. P. U. C. DIV.  
INFO. CONTROL DIV.

**ORIGINAL**

Please Print:

1. Your Name, Mailing Address and Telephone Number

Name Barbara McCrea  
Street/P.O. Box 1724 S. HALL ST Apt# 2  
City Allentown State PA Zip 18103  
County Lehigh Home Telephone-Area Code (610) 797-4170  
Work Telephone-Area Code ( ) same

2. Which company does your complaint concern?

Name of Company Consumer Complaint for  
PP&L Electric

3. What is your complaint?

I feel that the PUC should  
regulate the rate hike of 20%  
proposed by PP&L. I don't feel as  
if I can afford that steep of a hike for  
the coming year.

**DOCKETED**

MAR 10 1995

**DOCUMENT**  
**FOLDER**

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

(-over-)

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

I would like the P.U.C. to investigate why P&L must raise their rates - what are they trying to accomplish? Why must everyone pay for their problems?

(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.

Barbara McCrea  
Signature of complaining person, or officer

2/24/95  
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: March 10, 1995

R-00943271C0129

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

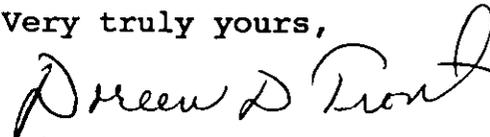
DOCUMENT  
FOLDER

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

Very truly yours,

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

for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 10, 1995

Barbara McCrea  
Complainant

VS.

Complaint Docket  
No: R-00943271C0129

Pa Power & Light Co  
Respondent

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

**DOCKETED**  
MAR 10 1995

TAKE NOTICE:

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

DOCUMENT  
FOLDER

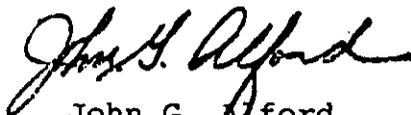
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John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

KJR

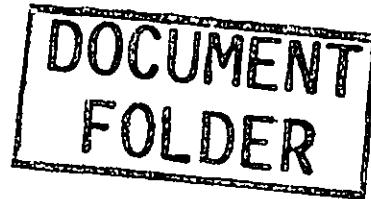
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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

FAX: 610/774-6726

March 27, 1995

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



Re: **Barbara McCrea v.**  
**Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0129**

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. Barbara McCrea  
The Honorable Robert A. Christianson

RECEIVED

MAR 27 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Barbara McCrea

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0129

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CERTIFICATION OF SERVICE

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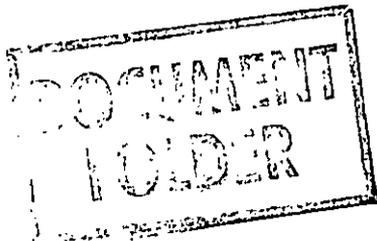
I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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

Ms. Barbara McCrea  
1724 South Hall Street, C2  
Allentown, Pennsylvania 18103

Dated this 27th day of March, 1995.

**DOCKETED**  
**MAR 28 1995**



  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Barbara McCrea

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0129

**DOCKETED**  
**MAR 28 1995**

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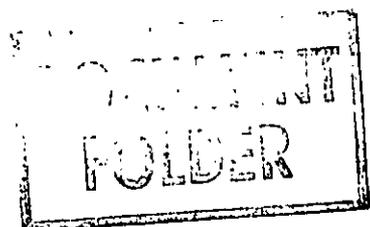
**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

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

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

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



**ORIGINAL**

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

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

Paul E. Russell  
Its Attorney

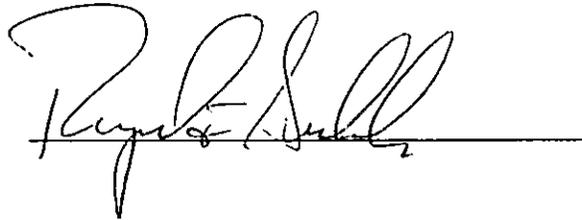
Of Counsel:  
David B. MacGregor, Esquire  
Morgan, Lewis & Bockius  
2000 One Logan Square  
Philadelphia, Pennsylvania 19103

Dated: March 27, 1995  
at Allentown, Pennsylvania

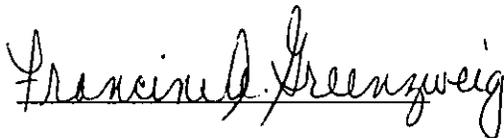
AFFIDAVIT

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 March, 1995.



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

FORMAL COMPLAINT FOR  
Pennsylvania Public Utility Commission

R-00943271C0130

Please Print:

ORIGINAL

RECEIVED  
95 MAR -9  
PA. DIV. OF  
INFO. CONSUM. DIV.  
MAR 10 1995

1. Your Name, Mailing Address and Telephone Number

Name John Decker  
Street/P.O. Box 1724 S. Hall St. Apt# \_\_\_\_\_  
City Allentown State Pa. Zip 18103  
County Lehigh Home Telephone-Area Code (610) 797-4170  
Work Telephone-Area Code (610) 797-4170

2. Which company does your complaint concern?

Name of Company Pennsylvania Power + Light

3. What is your complaint?

they do not have a product that customers  
can afford a 20% increase all at once.  
When Tesla discovered alternating current it  
was meant to be a help to mankind not  
a burden that people had to worry  
about.

DOCKETED  
MAR 10 1995

DOCUMENT  
FOLDER

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

(-over-)

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

I would like the P.U.C. to  
look into this problem & see just why  
20% is necessary.

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

5. You must sign and date your complaint.

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

John Decker Jr.

02/24/95

Signature of complaining person, or officer

Date Signed

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

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 10, 1995

R-00943271C0130

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

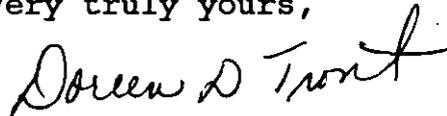
DOCUMENT  
FOLDER

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

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 10, 1995

John Decker  
Complainant

VS.

Pa Power & Light Co  
Respondent

Complaint Docket  
No: R-00943271C0130

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

**DOCKETED**  
MAR 10 1995

TO: Pa Power & Light Co

**TAKE NOTICE:**

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

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

DOCUMENT  
FOLDER

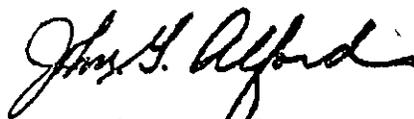
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

KJR

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

FAX: 610/774-6726

March 27, 1995

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



Re: **John Decker v.  
Pennsylvania Power & Light Company**  
**Docket No. R-00943271C0130**

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. John Decker  
The Honorable Robert A. Christianson

**RECEIVED**

**MAR 27 1995**

**PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU**

**ORIGINAL**

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

John Decker

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0130

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CERTIFICATION OF SERVICE

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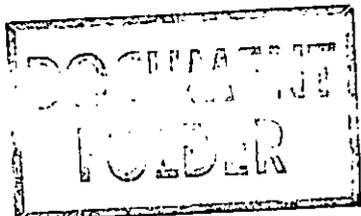
I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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

Mr. John Decker  
1724 S. Hall Street  
Allentown, Pennsylvania 18103

Dated this 27th day of March, 1995.

DOCKETED  
MAR 28 1995



  
Paul E. Russell

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

John Decker

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0130

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ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY

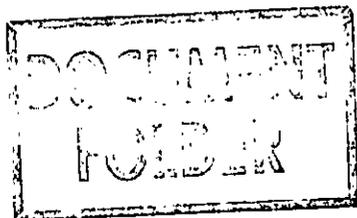
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DOCKETED  
MAR 28 1995

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

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

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



ORIGINAL

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:

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

Paul E. Russell  
Its Attorney

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

Dated: March 27, 1995  
at Allentown, Pennsylvania



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

R-00943271C0131  
110500

**ORIGINAL**

RECEIVED  
95 MAR 15 AM 10:31  
INFO. CONTROLS DIV.  
P.A. P.U.C. DIV.

Please Print:

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

Name Diane R. Francis  
Street/P.O. Box RD 3 Box 3183 Apt# \_\_\_\_\_  
City Stroudsburg State Pa. Zip 18360  
County Monroe Home Telephone-Area Code (717) 629-4194  
Work Telephone-Area Code ( ) \_\_\_\_\_

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

Name of Company Pennsylvania Power & Light

**3. What is your complaint?**

When I purchased my home in 1980 it had electric baseboard heat. An incentive was the lower per kilowatt cost for homes with this type of heat. Eventually that lower cost was abolished. I then relied on my woodstove for heat and eventually switched to a coal stove. Approximately 4 years ago I put in a complete new heating system. It is an off peak thermal storage system that was highly promoted by P.P.&L - cost \$6500.00!! The off peak is sometimes an inconvenience but the incentive, of course, is the lower usage cost. With the rate increase proposed by P.P.&L I will pay a disproportionate amount <sup>of the increase</sup> of these expensive systems which use a large amount of kilowatts will no longer be the highly regarded systems pushed by P.P.&L. In fact my electric bill will probably increase \$60-\$100 PER MONTH!!

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

**DOCKETED**  
MAR 20 1995

(-over-)

**DOCUMENT  
FOLDER**

45

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

I want the PUC to Deny P.P.K. a Rate Increase.  
If the PUC feels an Increase is justified  
I Request that it Be in proportion & no unfair  
Burden Be Placed on those of us who fell for  
P.P.K's Bill of goods.

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

5. You must sign and date your complaint.

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

Denise B. Francis

3/13/95

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

Date Signed

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

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

Street \_\_\_\_\_

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

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

930107

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

KJR

DATE SERVED: March 20, 1995

R-00943271C0131

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

DOCUMENT  
FOLDER

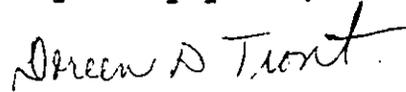
R-00943271C0131

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

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

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

Very truly yours,



for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 20, 1995

Diane R. Francis  
Complainant

VS.

Complaint Docket  
No: R-00943271C0131

Pa Power & Light Co  
Respondent

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

**DOCKETED**  
MAR 20 1995

TO: Pa Power & Light Co

TAKE NOTICE:

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

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

DOCUMENT  
FOLDER

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

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

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

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

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



John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

KJR

**ORIGINAL**

April 10, 1995

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

RECEIVED  
95/FER 12 /M 9:24  
PA. P.U.C.  
INFO. CONTROL DIV.

Re: **Diane R. Francis v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0131**

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: Ms. Diane R. Francis  
The Honorable Robert A. Christianson

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Diane R. Francis

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0131

---

**CERTIFICATION OF SERVICE**

---

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

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

Ms. Diane R. Francis  
RD 3, Box 3183  
Stroudsburg, Pennsylvania 18360

Dated this 10th day of April, 1995.

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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Diane R. Francis

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0131

**DOCKETED**  
APR 14 1995

**DOCUMENT  
FOLDER**

---

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

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

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

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

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

PP&L does not have information or knowledge sufficient to respond to Complainant's statements regarding her personal finances, her experience with an off-peak thermal storage system or her experience with Rate RTS.

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 10, 1995  
at Allentown, Pennsylvania



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

R-00943271C0132  
110500

Please Print:

**ORIGINAL**

RECEIVED  
95 MAR 16 AM 9:37  
PA. P. U. C.  
INFO. CONTROL DIV

1. Your Name, Mailing Address and Telephone Number

Name JOHN B. PYLE

Street/P.O. Box 32&3 PLEASANT VIEW DR. Apt#

City MANHEIM State PA Zip 17545

County LANCASTER Home Telephone-Area Code (717) 653-2411

**DOCKETED**  
MAR 27 1995

Work Telephone-Area Code (717) 790-7876

**DOCUMENT**

2. Which company does your complaint concern?

Name of Company PA. POWER & LIGHT (P&L) FOLDER

3. What is your complaint? Ans: P&L's pending rate request is unfair, unjust & outrageous!!!

1. Unfair because it is weighted disproportionately against the residential vs industrial or business users.

Unjust in that PPL, via their Supplement 50, has not justified this cost increase in a reasonable fashion.

Outrageous, because unlike every other Employer (involving cost cutting & downgrading techniques) this "greedy monopoly" proposes to pass along all cost increases to "Mr. Consumer."

2. Presently we are struggling to meet & pay current bills which run \$3000.00 yearly - \$250.00 monthly. Another \$500/month will cause us financial hardship.

3. We are approaching retirement now. These kind of cost increases will force us to try to move out - but then who would want to buy a house with such higher utility costs? -

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

"A White Elephant"

(-over-)

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

1. Request PUC deny PPL this rate increase request especially the residential portion.

2. Request PUC have PPL lower its current rates to a more reasonable level

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

5. You must sign and date your complaint.

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

John B. Boyle

3/13/95

Signature of complaining person, or officer

Date Signed

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

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

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

Street \_\_\_\_\_

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

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

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

DATE SERVED: March 27, 1995

R-00943271C0132

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

Dear Mr. Russell:

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

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

CUSTOMER OF A UTILITY

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

COMPANY/UTILITY

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

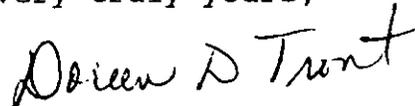
DOCUMENT  
FOLDER

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

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

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

Very truly yours,

A handwritten signature in cursive script that reads "Doreen D. Trout".

for John G. Alford  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 27, 1995

John B. Pyle  
Complainant

VS.

Pa Power & Light Co  
Respondent

Complaint Docket  
No: R-00943271C0132

**DOCKETED**  
MAR 27 1995

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

TO: Pa Power & Light Co

**TAKE NOTICE:**

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

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

DOCUMENT  
FOLDER

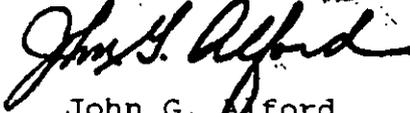
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.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

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

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

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

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

  
John G. Alford  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



**Pennsylvania Power & Light Company**

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

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

FAX: 610/774-6726

ORIGINAL

April 13, 1995

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

RECEIVED  
APR 13 1995  
PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

Re: **John B. Pyle v.  
Pennsylvania Power & Light Company**  
Docket No. R-00943271C0132

Dear Secretary Alford:

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

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Mr. John B. Pyle  
The Honorable Robert A. Christianson

DOCUMENT  
FOLDER

9/11

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

John B. Pyle

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0132

RECEIVED  
APR 13 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 B. Pyle  
3283 Pleasant View Drive  
Manheim, Pennsylvania 17545

Dated this 13th day of April, 1995.



---

Paul E. Russell

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**DOCKETED**  
**APR 18 1995**

John B. Pyle

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0132

**RECEIVED**  
**APR 13 1995**  
PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

---

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY**

---

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

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

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

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

**DOCUMENT  
FOLDER**

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

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

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

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

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

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

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

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: April 13, 1995  
at Allentown, Pennsylvania



LAW OFFICES OF  
**STEVENS & LEE**  
A PROFESSIONAL CORPORATION

PLEASE RESPOND TO HARRISBURG

R-00943271 C0133  
110500

ORIGINAL

March 27, 1995

RECEIVED  
95 MAR 27 PM 10:13  
P.A. CONTROL DIV.

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

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

Dear Secretary Alford:

Enclosed please find an original and two copies of a Formal Complaint for filing in regard to the above captioned proceeding. As indicated by the attached certificate of service, all parties of record have been served a copy hereof.

Should you have any questions or comments, please do not hesitate to contact my office.

Sincerely,

STEVENS & LEE

*Kenneth Zielonis*  
Kenneth Zielonis

KZ/aku

**DOCKETED**  
MAR 29 1995

DOCUMENT  
FOLDER

ORIGINAL

DOCKETED

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MAR 29 1995

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION, ET. AL.

v.

PENNSYLVANIA POWER AND LIGHT  
COMPANY

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DOCKET NO. R-00943271C 0133

RECEIVED  
95 MAR 27 PM 10:43  
PA. P. U. S. DIV.  
INFO. CONTROL DIV.

---

FORMAL COMPLAINT

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AND NOW COMES, Crown American Realty Trust, ("Crown American"), by and through its attorneys, and files, pursuant to Section 701 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §701 and §5.21, et. seq. of the Pennsylvania Public Utility Commission's ("Commission") Rules of Practice and Procedure, 52 Pa. Code §5.21, this Formal Complaint, and in support thereof, avers the following:

1. The Complainant is:

Crown American Realty Trust  
Pasquerilla Plaza  
Johnstown, Pennsylvania 15907.

DOCUMENT  
FOLDER

2. The name and address of Complainant's counsel are:

Kenneth Zielonis, Esquire  
Stevens & Lee  
208 North 3rd Street, Suite 310  
Harrisburg, PA 17101  
(717) 234-1250

(717) 234-1939 (Facsimile).

3. The Respondent is Pennsylvania Power and Light Company. Pennsylvania Power and Light Company ("PP&L") is a regulated jurisdictional public utility rendering electrical service throughout portions of central and eastern Pennsylvania. It renders service to customers under its currently effective tariff.

4. Crown American, through various subsidiaries, owns and operates shopping malls located throughout PP&L's service territory. Specifically, it owns and operates shopping malls located in Wilkes-Barre, Scranton, Camp Hill, Williamsport and Frackville, Pennsylvania. As a customer of PP&L, Crown American's shopping malls take service from PP&L under its existing rate schedules LP-4 and LP-5 and various riders and related tariffs.

5. On or about December 30, 1994 PP&L filed Supplement No. 50 to Tariff-Electric Pa. P.U.C. No. 200. Supplement No. 50 represents a general rate increase under Section 1308(d) of the Code. 66 Pa. C.S. § 1308(d). The Commission has suspended the effective date of Supplement No. 50 for the full statutory period permitted by the Code.

6. The cost of electrical service is a significant component in Crown American's cost of business operations. The proposed rate increase and related tariff changes will have an adverse effect on Crown American's business operations at its facilities noted above. As a result, Crown American is substantially and directly impacted by PP&L's proposed rate increase and related tariff changes.

7. Crown American believes and therefore avers that the

information and data filed in support of the proposed rate increase and tariff changes in Supplement No. 50 are insufficient to establish that the rates are just, reasonable and undiscriminatory as required by Section 1301 and 1304 of the Code. 66 Pa. C.S. §1301 and 1304.

8. Crown American believes and therefore avers that the proposed distribution of the rate increase among PP&L's customers classes is not just and reasonable. Crown American also believes and therefore avers the cost of service study methodology utilized by PP&L may not be appropriate for determination of the allocation of costs incurred on the system. And finally, PP&L's proposed rate structure and rate design changes to rate schedules LP-4 and LP-5 are not just and reasonable. Crown American reserves the right to raise additional issues when it has an opportunity to complete discovery and testimony in more detail.

9. Crown American realizes that this matter is subject to an existing procedural schedule. Crown American is willing to accept the procedural schedule and the evidentiary record as it now stands.

WHEREFORE, for all the foregoing reasons, Crown American Realty Trust respectfully requests the following:

- a. Entertain this Formal Complaint;
- b. Hold full evidentiary hearings thereon;
- c. Reject Pennsylvania Power and Light Company's Supplement No. 50 to Tariff-Electric Pa. P.U.C. No. 200;
- d. Consolidate this Formal Complaint with any Commission

instituted investigation of Supplement No. 50 to Tariff-  
Electric Pa. P.U.C.;

- e. Grant such other relief as the Commission deems necessary  
and proper.

Respectfully submitted,

  
Kenneth Zielonis, Esquire  
STEVENS & LEE  
208 N. 3rd Street, Suite 310  
Harrisburg, PA 17101

Dated: March 27, 1995

Counsel for Crown American  
Realty Trust

AFFIDAVIT

I, Kenneth Zielonis, counsel for Crown American Realty Trust, being duly sworn according to law, deposes and says that the facts set forth in the Formal Complaint are true and correct to the best of his knowledge, information and belief and it intends to prove the same at any trial hereof.

Kenneth Zielonis

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

Amy K. Underkoffler  
(My Commission Expires)

Notarial Seal  
Amy K. Underkoffler, Notary Public  
Harrisburg, Dauphin County  
My Commission Expires Oct. 27, 1997  
Member, Pennsylvania Association of Notaries

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION, ET. AL.

v.

PENNSYLVANIA POWER & LIGHT  
COMPANY

\*  
\*  
\*  
\* DOCKET NO. R-00943271  
\*  
\*  
\*

CERTIFICATE OF SERVICE

I hereby certify that I have this 27th day of March, 1995, served a copy of the attached Formal Complaint upon the participants listed below by First Class Mail, postage prepaid or by hand-delivery (unless service is otherwise indicated), in accordance with 52 Pa. Code Section 1.54:

Honorable Robert A. Christianson  
Administrative Law Judge  
PA Public Utility Commission  
North Office Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Bernard A. Ryan, Jr., Esquire  
Small Business Advocate  
Office of Small Bus. Advocate  
Suite 1102, Commerce Bldg.  
300 North Second Street  
Harrisburg, PA 17101

David E. MacGregor, Esquire  
Thomas Gadsden, Esquire  
Morgan, Lewis and Bockius  
2000 One Logan Square  
Philadelphia, PA 19103-6993

Johnnie E. Simms, Esquire  
Office of Trial Staff  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Paul E. Russell, Esquire  
Pennsylvania Power & Light  
2 North Ninth Street  
Allentown, PA 18101

D. Jane Drennan, Esquire  
Sarah E. Tomalty, Esquire  
Drennan & Associates  
1216 16th Street, N.W.  
Washington, D.C. 20036

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

David A. McCormick, Esquire  
Department of the Army  
Office of the Judge Advocate  
General  
901 North Stuart Street  
Arlington, VA 22203-1837

Irwin A. Popowsky, Esquire  
Consumer Advocate  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Robert P. Haynes, Esquire  
Mette, Evans & Woodside  
3401 North Front Street  
Harrisburg, PA 17110

Daniel P. Delaney, Esquire  
James P. Melia, Esquire  
Kirkpatrick & Lockhart  
240 North Third Street  
Harrisburg, PA 17101

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

*Kenneth Zielonis*  
\_\_\_\_\_  
Kenneth Zielonis  
STEVENS & LEE  
208 North 3rd Street, Suite 310  
P.O. Box 12090  
Harrisburg, PA 17108-2090

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

DATE SERVED: March 29, 1995

R-00943271C0133

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 Kenneth Zielonis for Crown American Realty Trust. 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: March 29, 1995

Kenneth Zielonis for Crown  
American Realty Trust  
Complainant

VS.

Pennsylvania Power and Light  
Company  
Respondent

Complaint Docket  
No: R-00943271C0133

DOCKETED  
MAR 29 1995

---

FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

---

DOCUMENT  
FOLDER

TO: Pennsylvania Power and 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

April 13, 1995

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

RECEIVED

APR 13 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

**Re: Crown American Realty Trust v.  
Pennsylvania Power & Light Company  
Docket No. R-00943271C0133**

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: Kenneth Zielonis, Esquire  
The Honorable Robert A. Christianson

DOCUMENT  
FOLDER

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Crown American Realty Trust

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0133

RECEIVED

APR 13 1995

PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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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

Kenneth Zielonis, Esquire  
Stevens & Lee  
208 North Third Street, Suite 310  
P. O. Box 12090  
Harrisburg, Pennsylvania 17108-2090

Dated this 13th day of April, 1995.

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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**DOCKETED**

**APR 20 1995**

Crown American Realty Trust

v.

Pennsylvania Power & Light  
Company

Complaint Docket  
No. R-00943271C0133

**RECEIVED**

APR 13 1995

**ANSWER OF  
PENNSYLVANIA POWER & LIGHT COMPANY** PUBLIC UTILITY COMMISSION  
SECRETARY BUREAU

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

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. PP&L is without information or knowledge sufficient to respond to Complainant's statements regarding its business operations.

5. Admitted.

**DOCUMENT  
FOLDER**

6. Denied. PP&L is without information or knowledge sufficient to respond to Complainant's statements regarding its business operations and the alleged impact of PP&L's rate filing upon those operations.

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

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

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

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

8. Denied. See PP&L's answer to paragraph 7, above.

9. No answer required.

The WHEREFORE paragraph constitutes a prayer for relief to which no answer is required.

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

Respectfully submitted,

PENNSYLVANIA POWER & LIGHT  
COMPANY

By:



Paul E. Russell  
Its Attorney

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

Dated: April 13, 1995  
at Allentown, Pennsylvania

