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DOCUMENT

SECRETARY'S BUREAU

2004 JUN -1 PM 4: 08

RECEIVED

June 1, 2004

James J. McNulty
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
PO Box 3265
Harrisburg, PA 17105-3265

**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-00049255**


Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the Objections of PPL Electric Utilities Corporation to the Notice of Deposition from the Public Lighting Users Group in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on all parties of record.

If you have any questions concerning these matters, please contact me at the addresses or telephone numbers provided above.

Respectfully submitted,


John H. Isom

JHI/jl

Enclosure

c: Certificate of Service

ORIGINAL

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SECRETARY'S BUREAU

2004 JUN -1 PM 4: 09

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Pennsylvania Public Utility Commission :
v. :
PPL Electric Utilities Corporation :

Docket No. R-00049255

**OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION TO THE
NOTICE OF DEPOSITION FROM THE PUBLIC LIGHTING USERS GROUP**

PPL Electric Utilities Corporation ("PPL Electric") hereby objects, pursuant to 52 Pa. Code § 5.343(f), to the "Notice of Deposition" issued by the Public Lighting Users Group ("PLUG") in the above-captioned proceeding on May 26, 2004. In support of its objection, PPL Electric states the following:

1. On March 29, 2004, PPL Electric filed Supplement No. 38 to Tariff - Electric Pa. P.U.C. No. 201, together with supporting data, proposing, *inter alia*, a general increase in base rates under Section 1308(d) of the Public Utility Code, 66 Pa.C.S. § 1308(d). PLUG served its Petition to Intervene in the proceeding at the prehearing conference on May 19, 2004.

2. Although PLUG participated in the prehearing conference, PLUG did not mention its intent to take depositions. Further, no other party mentioned the possibility of oral depositions. The lack of discussion of oral depositions reflects the fact that oral depositions are not generally used in discovery in base rate proceedings.

3. At the prehearing conference, the presiding Administrative Law Judge, Allison K. Turner ("ALJ"), adopted an expedited schedule for discovery which, among other things, reduced the time for answering interrogatories from fifteen to ten days.

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4. Because no party, including PLUG, raised the possibility of depositions at the prehearing conference, the schedule for expedited discovery was adopted without consideration of the possibility of depositions. Indeed, the expedited discovery schedule does not mention oral depositions. Prehearing Order No. 2, pp. 6-7 (May 20, 2004).

5. Approximately 650 interrogatories have been served upon PPL Electric, and the parties continue to serve interrogatories on PPL Electric. PPL Electric has responded to the vast majority of these interrogatories, but the burden of answering interrogatories has been and continues to be substantial, especially under the expedited discovery schedule.

6. On May 26, 2004, PLUG served upon PPL Electric Notice of Deposition of three of PPL Electric's principal witnesses, Joseph M. Kleha, Oliver G. Kasper and Douglas A. Krall. These three witnesses are responsible for answering a large percentage of the interrogatories that have been propounded to PPL Electric and which continue to be propounded to PPL Electric.

7. Under the circumstances of this proceeding, especially under the expedited discovery schedule, depositions of these three witnesses would be unduly burdensome for PPL Electric and would interfere with the written discovery being conducted by numerous other parties, in this proceeding.

8. *PPL Electric cannot reasonably be expected to both answer hundreds of interrogatories on an accelerated basis and to make three of its principal witnesses available for a deposition.*

9. Depositions can be as time consuming as evidentiary hearings. Preparation for depositions would include substantial review of materials related to issues identified

in the Notice of Deposition. The issues identified in the Notice of Deposition are very broad. They include the cost of service studies, cost allocations, rate structure, street and traffic lighting including quality of service, and demand side management. Certain of these issues are very broad and affect all proposed rates and customers.

10. PPL Electric notes that PLUG apparently did not serve the Notice of Deposition on parties other than PPL Electric. Other parties, however, may have valid objections to the Notice of Deposition because it would delay PPL Electric's answers to other parties' written interrogatories and because the time of the deposition may be inconvenient. Pursuant to 52 Pa. Code § 5.343(f), PPL Electric is serving these objections on all active participants in this proceeding.

11. It is noted also that PLUG has not served upon PPL Electric any written interrogatories. Instead, PLUG apparently intends to rely upon oral depositions to obtain information and bypass the process of discovery through written interrogatories and answers thereto.

12. The deposition itself is of unknown duration, but the depositions have the potential to be extremely long. Not only PLUG but also all other parties would have an opportunity to question the three witnesses on broad issues that are identified in the Notice of Deposition.

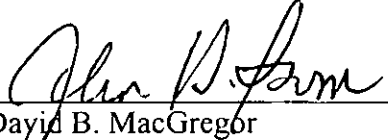
13. These three witnesses would have to defer preparation of answers to written interrogatories in order to prepare for and participate in the depositions. The effect of the depositions would be to delay PPL Electric's answers to written interrogatories from other parties and would unduly burden PPL Electric. Under the circumstances of this proceeding, PLUG should not be permitted to depose Mr. Kleha,

Mr. Kasper or Mr. Krall. Instead, PLUG should be required to use the informal discovery conferences that have been scheduled for June 7 and 8 as well as written discovery as the means of obtaining information from PPL Electric, as have all other parties.

14. Further, as a general matter, oral depositions are not appropriate for base rate cases under most circumstances. Oral depositions disrupt discovery through written interrogatories and answers to the detriment of those parties seeking written discovery. Further, written discovery is preferable for expressions by experts of opinions rather than specific factual disputes, and written discovery has the advantage of making information available to all parties essentially simultaneously. There are good and valid reasons when oral depositions are not generally used in base rate cases.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation objects to the Notice of Deposition from the Public Lighting Users Group dated May 26, 2004.

Respectfully submitted,



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Of Counsel:

Morgan, Lewis & Bockius LLP

Date: June 1, 2004

Attorneys for PPL Electric
Utilities Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Objections of PPL Electric Utilities Corporation to the Notice of Deposition from The Public Lighting Users Group** upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

VIA E-MAIL AND FIRST-CLASS MAIL

Honorable Allison K. Turner
Administrative Law Judge
Pennsylvania Public Utility Commission
Philadelphia State Office Building
1400 West Spring Garden Street
Room 1302
Philadelphia, PA 19130

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James A. Mullins, Esquire
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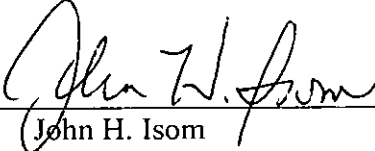
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Date: June 1, 2004



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June 1, 2004

James J. McNulty
Secretary
Pennsylvania Public Utility Commission
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PO Box 3265
Harrisburg, PA 17105-3265

**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-00049255**

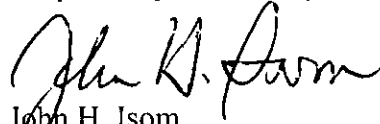
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the Objections of PPL Electric Utilities Corporation to Certain Interrogatories in Eric Epstein's Interrogatories, Set III in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on all parties of record.

If you have any questions concerning these matters, please contact me at the addresses or telephone numbers provided above.

Respectfully submitted,


John H. Isom

JHI/jl

Enclosure

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ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. :
PPL Electric Utilities Corporation :

Docket No. R-00049255

SECRETARY'S BUREAU

2004 JUN - 1 PM 4: 07

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**OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION
TO CERTAIN INTERROGATORIES IN
ERIC EPSTEIN'S INTERROGATORIES, SET III**

PPL Electric Utilities Corporation ("PPL Electric") hereby objects, pursuant to 52 Pa. Code § 5.342, to certain written interrogatories included in Mr. Eric Joseph Epstein's Interrogatories, Set III.

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1. PPL Electric objects to Interrogatory No. 1 in Mr. Epstein's third set of interrogatories, which reads as follows:

"Interrogatory 1: Please identify by name, party and amount, financial contributions made by 'PPL,' to Pennsylvania politicians from 1994 through 2004."

PPL Electric objects to this interrogatory on the grounds that it is unreasonably burdensome in that, through the instructions, the interrogatory calls for information concerning all of PPL Electric's past and present future attorneys, agents, employees, representatives. Thus, in order to respond to the interrogatory, for example, PPL Electric would be required to contact every present and former employee with regard to political contributions made over the last eleven years. By way of further response, however, PPL Electric has made no political contributions during the period in question.

2. PPL Electric objects to Interrogatory No. 2 in Mr. Epstein's third set of interrogatories, which reads as follows:

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“Interrogatory 2: Please identify by name, party and amount, financial contributions made by ‘PPL Electric Utilities Corporation’ to Pennsylvania politicians from 1998 through 2004.”

PPL Electric objects to this interrogatory on the grounds that it is unreasonably burdensome in that, through the instructions, the interrogatory calls for information concerning all of PPL Electric’s past and present future attorneys, agents, employees, representatives. Thus, in order to respond to the interrogatory, for example, PPL Electric would be required to contact every present and former employee with regard to political contributions made over the last seven years. By way of further response, however, PPL Electric has made no political contributions during the period in question.

3. PPL Electric objects to Interrogatory No. 3 in Mr. Epstein’s third set of interrogatories which reads as follows:

“Interrogatory 3: Please identify by parcel, location and value, the Company’s rights-of-ways, easements, and community properties.”

PPL Electric objects to this interrogatory on the grounds that it is unreasonably burdensome in that it calls for detailed information concerning all of PPL Electric’s rights-of-way, easements, and “community properties.” In fact, PPL Electric has property rights in thousands of tracts of land throughout its service territory. Further, the interrogatory would place additional burdens on PPL Electric in that it asks for the “value” of PPL Electric’s interests in each tract of land. Although the interrogatory is vague, it seems to request current market value of each such property. Consequently, the interrogatory would require PPL Electric to obtain an appraisal for each of its thousands of properties. The interrogatory is further improper because the current market value of PPL Electric’s real estate interests has no relevance to this proceeding. Instead, the value of real estate in PPL Electric’s rate base is based upon the original cost of the real estate

when it was first dedicated to public service. The interrogatory is improper for the additional reason that it is unreasonably vague. PPL Electric does not understand the phrase “community properties,” and therefore, PPL Electric cannot respond to that portion of the interrogatory.

4. PPL Electric objects to Interrogatory No. 4 in Mr. Epstein’s third set of interrogatories, which reads as follows:

“Interrogatory 4: Please identify by amount, year and location, taxes paid by ‘PPL’ to school districts and municipalities in Pennsylvania from 1994 through 2004.”

PPL Electric provides service and maintains facilities to provide service in all or portions of twenty-nine counties spanning a service territory which is approximately 10,000 square miles in size. Because PPL Electric provides service in numerous school districts and municipalities, it pays taxes to numerous school districts and municipalities. PPL Electric objects to Interrogatory No. 4 on the grounds that providing detailed information about all taxes paid by PPL Electric to school districts and municipalities over an eleven year period would be unreasonably burdensome. Further, information for periods prior to the test years in this proceeding is irrelevant because such historical data do not form the basis of any claim by PPL Electric in this proceeding. By way of further response, however, PPL Electric is willing to answer Interrogatory No. 4 to the extent that it requests information concerning the historic and future test years.

5. PPL Electric objects to Interrogatory No. 5 in Mr. Epstein’s third set of interrogatories, which reads as follows:

“Interrogatory 5: Please identify by amount and year, taxes by ‘PPL’ to the Commonwealth of Pennsylvania from 1994 through 2004.”

PPL Electric objects to Interrogatory No. 5, to the extent that it requests data prior to the historic and future test years. PPL Electric pays numerous different taxes to the Commonwealth of Pennsylvania. Therefore, answering Interrogatory No. 5 for years prior to the historic test year would be unreasonably burdensome. Further, such information is irrelevant to this proceeding because tax payments to the Commonwealth of Pennsylvania for periods prior to the test years do not form the basis of any claim in this proceeding.

6. PPL Electric objects to Interrogatory No. 6 in Mr. Epstein's third set of interrogatories, which reads as follows:

“Interrogatory 6: Please identify by amount, year and location, taxes paid by ‘PPL Electric Utilities Corporation to school districts and municipalities in Pennsylvania from 1998 through 2004.’”

PPL Electric maintains facilities to provide service in all or portions of twenty-nine counties spanning a service territory which is approximately 10,000 square miles in size. Because PPL Electric provides service in numerous school districts and municipalities, it pays taxes to numerous school districts and municipalities. PPL Electric objects to Interrogatory No. 6 on the grounds that providing detailed information about all taxes paid by PPL Electric to school districts and municipalities over a seven year period would be unreasonably burdensome. Further, information prior to the test years in this proceeding is irrelevant because such historical data do not form the basis of any claim by PPL Electric in this proceeding. By way of further response, however, PPL Electric is willing to answer Interrogatory No. 6 to the extent that it requests information concerning the historic and future test years.

7. PPL Electric objects to Interrogatory No. 7 in Mr. Epstein's third set of interrogatories, which reads as follows:

“Interrogatory 7: Please identify by amount and year, taxes by “PPL” to the Commonwealth of Pennsylvania from 1994 through 2004.”

PPL Electric objects to Interrogatory No. 7, to the extent that it requests data prior to the historic and future test years. PPL Electric pays numerous different taxes to the Commonwealth of Pennsylvania. Therefore, answering Interrogatory No. 7 for years prior to the historic test year would be unreasonably burdensome. Further, such information is irrelevant to this proceeding because tax payments to the Commonwealth of Pennsylvania for periods prior to the test years do not form the basis of any claim in this proceeding.

8. PPL Electric objects to a portion of Interrogatory No. 8 in Mr. Epstein’s third set of interrogatories, which reads as follows;

“Interrogatory 8:

On June 1, 2002, “Public Utilities Fortnightly” published a list of highest paid electric CEO’s. PPL’s William Hecht was ranked 31 at \$1,197,500. Several weeks later, on June 19, 2002, PPL cut its work force by 7%.

- a) Please list PPL Electric Utilities total staffing levels from 1998 – 2004.
- b) Please identify PPL William Hecht compensation packages from 1994 through 2004.”

PPL Electric objects to Interrogatory No. 8, to the extent that it requests data for periods prior to the historic test year. The information called for by the interrogatory for periods prior to the historic test year are irrelevant to this proceeding because such information was not used as a basis for any claim by PPL Electric in this proceeding. PPL Electric, however, is willing to answer Interrogatory No. 8 to the extent that it calls for information for the historic and future test years in this proceeding.

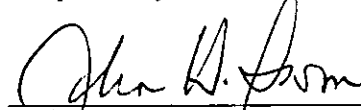
9. PPL Electric objects to Interrogatory No. 9 of Mr. Epstein's third set of interrogatories, which reads as follows:

"Interrogatory 9:

- a) When a PPL employee exercises a stock option, does the Company treat the employee's profit on that option as an expense for tax purposes?
- b) If the answer is yes, when was this policy implemented?
- c) Please document, by year, the number of employee's who fit into this category, and the amount of money expended by the Company."

PPL Electric objects to Interrogatory No. 9, to the extent that it requests data for periods prior to the historic test year. The information called for by the interrogatory for periods prior to the historic test year are irrelevant to this proceeding because such information was not used as a basis for any claim by PPL Electric in this proceeding. PPL Electric, however, is willing to answer Interrogatory No. 9 to the extent that it calls for information for the historic and future test years in this proceeding.

Respectfully submitted,



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Of Counsel:

Morgan, Lewis & Bockius LLP

Date: June 1, 2004

Attorneys for PPL Electric
Utilities Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Objections of PPL Electric Utilities Corporation to Certain Interrogatories in Eric J. Epstein's Interrogatories, Set III** upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

VIA E-MAIL AND FIRST-CLASS MAIL

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Administrative Law Judge
Pennsylvania Public Utility Commission
Philadelphia State Office Building
1400 West Spring Garden Street
Room 1302
Philadelphia, PA 19130

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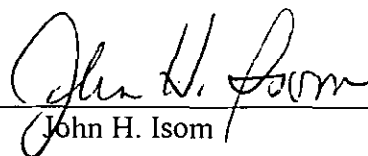
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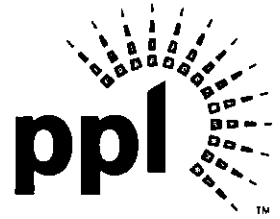
Date: June 1, 2004



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June 1, 2004

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James J. McNulty, Esquire
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Pennsylvania Public Utility Commission
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400 North Street
Harrisburg, Pennsylvania 17120

RECEIVED

JUN - 1 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying responses to interrogatories that PPL Electric Utilities Corporation served today on the active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Allison K. Turner

RECEIVED

JUN - 1 2004

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric : Docket No. R-00049255
Pa. P.U.C. No. 201 :

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of the Office of Consumer Advocate, Set VI, Questions 1 through 48; Set VII, Questions 1 through 14; Set VIII, Questions 1 through 3; Set IX, Questions 1 through 6; and Set X, Questions 1 through 22, upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

VIA FEDERAL EXPRESS

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Dated: June 1, 2004



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June 1, 2004

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James J. McNulty, Esquire
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

JUN - 1 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying responses to interrogatories that PPL Electric Utilities Corporation served today on the active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

A handwritten signature in black ink that reads "Paul E. Russell". The signature is written in a cursive, flowing style.

Paul E. Russell

Attachment

cc: The Honorable Allison K. Turner

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric :
Pa. P.U.C. No. 201 :

Docket No. R-00049255

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of Eric Epstein, Set II, Questions 1 through 21 upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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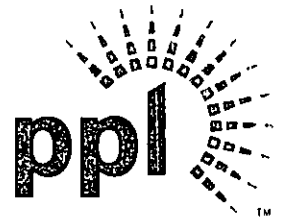
Dated: June 1, 2004



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June 1, 2004

Mr. Eric Epstein
4100 Hillside Road
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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Mr. Epstein:

Enclosed are the responses of PPL Electric Utilities Corporation ("PPL Electric") to Eric Epstein's Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of the Companies' responses have been served on all active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Enclosures

cc: Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric :
Pa. P.U.C. No. 201 :

Docket No. R-00049255

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CERTIFICATION OF SERVICE

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of Eric Epstein, Set II, Questions 1 through 21 upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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Dated: June 1, 2004



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June 1, 2004

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Mr. Mullins:

Enclosed are the responses of PPL Electric Utilities Corporation ("PPL Electric") to the Office of Consumer Advocate's Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of the Companies' responses have been served on all active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Enclosures

cc: Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUN - 1 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric : Docket No. R-00049255
Pa. P.U.C. No. 201 :

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of the Office of Consumer Advocate, Set VI, Questions 1 through 48; Set VII, Questions 1 through 14; Set VIII, Questions 1 through 3; Set IX, Questions 1 through 6; and Set X, Questions 1 through 22, upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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Dated: June 1, 2004



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June 3, 2004

FEDERAL EXPRESS

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**Re: PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying responses to interrogatories that PPL Electric Utilities Corporation served today on the active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Allison K. Turner

RECEIVED

JUN 02 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric : Docket No. R-00049255
Pa. P.U.C. No. 201 :

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of PP&L Industrial Customer Alliance, Set II, Questions 1 through 5, upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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Dated: June 3, 2004



Paul E. Russell

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PA PUBLIC UTILITY COMMISSION
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FEDERAL EXPRESS

June 3, 2004

Mr. Eric Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

**Re: PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Mr. Epstein:

Enclosed are the responses of PPL Electric Utilities Corporation ("PPL Electric") to Eric Epstein's Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of the Companies' responses have been served on all active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Enclosures

cc: Certificate of Service

RECEIVED
JUN 02 2004
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric : Docket No. R-00049255
Pa. P.U.C. No. 201 :

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of Eric Epstein, Set III, Questions 1 through 10 upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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Dated: June 3, 2004



Paul E. Russell

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FEDERAL EXPRESS

June 3, 2004

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**Re: PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Ms. Polacek:

Enclosed are the responses of PPL Electric Utilities Corporation ("PPL Electric") to the PP&L Industrial Customer Alliances' Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of the Companies' responses have been served on all active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Enclosures

cc: Certificate of Service

RECEIVED

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric : Docket No. R-00049255
Pa. P.U.C. No. 201 :

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of PP&L Industrial Customer Alliance, Set II, Questions 1 through 5, upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

VIA FEDERAL EXPRESS

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David M. Kleppinger, Esquire
Pamela Polacek, Esquire
McNees, Wallace & Nurick
100 Pine Street
Harrisburg, PA 17108

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JUN 02 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

David A. McCormick, Esquire
Regulatory Law Office (JALS-RL)
US Army Legal Services Agency
901 North Stuart Street, Room 713
Arlington, VA 22203-1837

Scott Rubin, Esquire
3 Lost Creek Drive
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1460 Wyoming Avenue
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Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
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Thomas Caitlin
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5565 Sterrett Place
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Kevin J. Moody, Esquire
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Roger E. Clark, Esquire
Sustainable Development Fund
718 Arch Street, Suite 300 North
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Stephen J. Baron, President
J. Kennedy and Associates, Inc.
570 Colonial Park Drive
Suite 305
Roswell, GA 30075

Eric Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

Eugene M. Brady
Commission on Economic Opportunity
165 Amber Lane
Wilkes-Barre, PA 18703-1127

Kent Murphy, Esquire
Legal Division
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Philadelphia, PA 19103

Patricia Armstrong
Thomas, Thomas, Armstrong & Niesen
Suite 500
212 Locust Street
Harrisburg, PA 17108

John L. Munsch, Senior Attorney
Allegheny Energy
800 Cabin Hill Drive
Greensburg, PA 15601

Mark C. Morrow, Esquire
UGI Utilities, Inc.
460 North Gulph Road
King of Prussia, PA 19406

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JUN 02 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Michael Fiorentino, Esquire
Joseph Otis Minott
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Philadelphia, PA 19103

Richard S. Herskovitz, Esquire
Duquesne Light
411 Seventh Avenue, 9th Floor
Pittsburgh, PA 15219

Peter Adels, General Counsel
Charley McPhedran, Senior Attorney
PennFuture
Suite 1801, 117 S. 17th Street
Philadelphia, PA 19103

Michael G. Wolfe, Esquire
FirstEnergy Corp.
2800 Pottsville Pike
Reading PA 19612-6001

Dated: June 3, 2004



Paul E. Russell

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JUN 02 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Paul Russell
Associate General Counsel

PPL
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.4254 Fax 610.774.6726
perussell@pplweb.com



June 3, 2004

FEDERAL EXPRESS

DOCUMENT

James J. McNulty, Esquire
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

**Re: PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying responses to interrogatories that PPL Electric Utilities Corporation served today on the active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paul E. Russell". The signature is written in a cursive, flowing style.

Paul E. Russell

Attachment

cc: The Honorable Allison K. Turner

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JUN 02 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric : Docket No. R-00049255
Pa. P.U.C. No. 201 :

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of Eric Epstein, Set III, Questions 1 through 10 upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

VIA FEDERAL EXPRESS

Irwin A. Popowsky, Esquire
James A. Mullins, Esquire
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555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923

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Steven C. Grey, Esquire
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Johnnie Simms, Esquire
Richard A. Kanaskie, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
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David M. Kleppinger, Esquire
Pamela Polacek, Esquire
McNees, Wallace & Nurick
100 Pine Street
Harrisburg, PA 17108

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Commission on Economic Opportunity
165 Amber Lane
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John L. Munsch, Senior Attorney
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Joseph Otis Minott
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Pittsburgh, PA 15219

Peter Adels, General Counsel
Charley McPhedran, Senior Attorney
PennFuture
Suite 1801, 117 S. 17th Street
Philadelphia, PA 19103

Michael G. Wolfe, Esquire
FirstEnergy Corp.
2800 Pottsville Pike
Reading PA 19612-6001

Dated: June 3, 2004



Paul E. Russell

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JUN 02 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

June 4, 2004

VIA E-MAIL AND FIRST CLASS MAIL

David MacGregor, Esquire
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921

**DOCUMENT
FOLDER**

SECRETARY'S BUREAU
04 JUN -7 AM 10:54

Re: Pennsylvania Public Utility Commission, et al. v. PPL Electric Utilities Corporation, Docket No. R-00049255; **INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY PLUG**

Dear Mr. MacGregor:

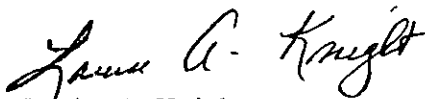
Enclosed with this letter please find two (2) copies of the Public Lighting User Group's (PLUG) Interrogatories and Request for Production of Documents – Set I pursuant to 52 Pa. Code §5.342(d).

When answering each question, please be sure to indicate the name of the person responsible for answering the interrogatory or producing the documents. Also, please attach an affidavit or verification for each person. Answers to interrogatories are due within ten (10) days per the Administrative Law Judge's Order at the Prehearing Conference held May 19, 2004. We would also appreciate answers to be forwarded as soon as they become available.

I am also forwarding a copy of these Interrogatories by e-mail although the due date will be calculated from the date set forth on this letter.

Should you have any questions regarding these Interrogatories or Requests for Production of Documents, please contact me at (717) 238.7655.

Very truly yours,


Louise A. Knight

c: James J. McNulty (cover letter only)
As Per Certificate of Service

June 4, 2004

VIA E-MAIL AND FIRST CLASS MAIL

Patricia Armstrong, Esquire
Thomas T. Niesen, Esquire
Thomas, Thomas, Armstrong & Niesen
212 Locust Street, Suite 500
P.O. Box 9500
Harrisburg, PA 17108-9500

**DOCUMENT
FOLDER**

SECRETARY'S BUREAU

04 JUN -7 AM 10:54

Re: Pennsylvania Public Utility Commission, et al. v. PPL Electric Utilities Corporation, Docket No. R-00049255; **INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY PLUG TO SUSTAINABLE ENERGY FUND OF CENTRAL EASTERN PENNSYLVANIA – SET I**

Dear Ms. Armstrong and Mr. Niesen:

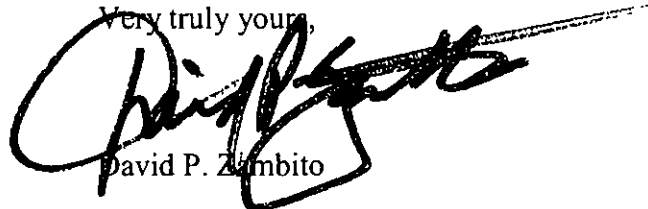
Enclosed with this letter please find two (2) copies of the Public Lighting User Group's (PLUG) Interrogatories and Request for Production of Documents to the Sustainable Energy Fund of Central Eastern Pennsylvania – Set I pursuant to 52 Pa. Code §5.342(d).

When answering each question, please be sure to indicate the name of the person responsible for answering the interrogatory or producing the documents. Also, please attach an affidavit or verification for each person. Answers to interrogatories are due within ten (10) days per the Administrative Law Judge's Order at the Prehearing Conference held May 19, 2004. We would also appreciate answers to be forwarded as soon as they become available.

I am also forwarding a copy of these Interrogatories by e-mail although the due date will be calculated from the date set forth on this letter.

Should you have any questions regarding these Interrogatories or Requests for Production of Documents, please contact me at (717) 238.7655.

Very truly yours,



David P. Zambito

c: James J. McNulty (cover letter only)
As Per Certificate of Service

Paul E. Russell
Associate General Counsel

PPL
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.4254 Fax 610.774.6726
perussell@pplweb.com



June 4, 2004

**DOCUMENT
FOLDER**

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JUN 04 2004

James J. McNulty, Esquire
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying responses to interrogatories that PPL Electric Utilities Corporation served today on the active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Allison K. Turner

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric :
Pa. P.U.C. No. 201 :

Docket No. R-00049255

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JUN 04 2004

CERTIFICATION OF SERVICE

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of the Office of Consumer Advocate, Set XI, Questions 1 and 2, upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

VIA FEDERAL EXPRESS

Irwin A. Popowsky, Esquire
James A. Mullins, Esquire
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555 Walnut Street
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Richard A. Kanaskie, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
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Industrial Economics Incorporated
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Commission on Economic Opportunity
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Charley McPhedran, Senior Attorney
PennFuture
Suite 1801, 117 S. 17th Street
Philadelphia, PA 19103

Michael G. Wolfe, Esquire
FirstEnergy Corp.
2800 Pottsville Pike
Reading PA 19612-6001

Dated: June 4, 2004

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

Paul E. Russell

ORIGINAL

WolfBlock

212 Locust Street, Suite 300, Harrisburg, Pennsylvania 17101
Tel: (717) 237-7160 □ Fax: (717) 237-7161 □ www.WolfBlock.com

Direct Dial: (717) 237-7187
Direct Fax: (717) 237-2767
E-mail: kmoody@wolfblock.com

June 4, 2004

James McNulty, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg., 2nd
Floor, 400 North Street P.O. Box 3265
Harrisburg, PA 17105-3265

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2004 JUN -4 PM 3:54
SECRETARY'S BUREAU
P.U.C.

Re: Pa. PUC, et al. v. PPL Electric Utilities Corporation;
Docket No. R-00049255, et al.

Dear Secretary McNulty

Enclosed for filing are the original and three copies of Strategic Energy L.L.C.'s Petition to Intervene in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM/jls
Enclosures

cc: Certificate of Service (w/enc)

DOCUMENT
FOLDER

DSH:41293.1/MID051-158776

Cherry Hill, NJ ■ Harrisburg, PA ■ New York, NY ■ Norristown, PA ■ Philadelphia, PA ■ Roseland, NJ ■ Wilmington, DE

WolfBlock Government Relations: Harrisburg, PA and Washington, DC

Wolf, Block, Schorr and Solis-Cohen LLP, a Pennsylvania Limited Liability Partnership

55

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION :

V. :

PPL ELECTRIC UTILITIES CORP. :

DOCKET NO. R-00049255

SECRETARY'S BUREAU

2004 JUN -14 PM 3:55

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PETITION TO INTERVENE
OF STRATEGIC ENERGY L.L.C.

Pursuant to 52 Pa. Code §§ 5.71-5.75, Strategic Energy L.L.C. ("Strategic") hereby petitions to intervene in the above-captioned proceeding and, in support hereof, states as follows:

1. Strategic is a Pennsylvania licensed electric generation supplier ("EGS") authorized to provide competitive electric supply and related services throughout Pennsylvania. Strategic is actively serving commercial load and actively marketing in the service territory of PPL Electric Utilities Corporation ("PPL").

2. PPL's request for an increase in distribution rates to become effective on January 1, 2005, after the cap on PPL's distribution rates established by its Restructuring Settlement expires, is the first distribution rate increase sought by a major Pennsylvania electric distribution company ("EDC") since the Electric Choice Act became effective in 1997.

3. Under 52 Pa. Code § 5.72(a), a person is eligible for intervention who has "an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." Strategic has an obvious and direct interest in the outcome of this proceeding, and Strategic will be bound by the Commission's action. Strategic serves customers in PPL's service territory, and Strategic's ability to compete with PPL's POLR service will be specifically and substantially affected by the outcome of this proceeding. The primary issue in this proceeding of

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JUN 1 1 2004

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importance to Strategic is whether PPL's proposed distribution rates include only PPL's distribution costs, or whether they also include generation related costs, because Strategic's energy supply prices include generation related costs. The limited shopping in PPL's service territory indicates that the Commission should take whatever actions are available to promote the development of the competitive retail generation market in PPL's territory.

4. Although Strategic is a member of the Mid-Atlantic Power Supply Association ("MAPSA"), which has intervened in this proceeding, Strategic's interests in this proceeding are unique from and may not be adequately represented by MAPSA. In addition, none of the other parties that have intervened are competitive suppliers or marketers of electric generation.

5. Strategic understands that it is bound by the procedural schedule and rules already established by the Presiding Officer.

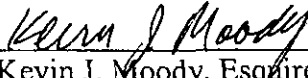
6. While PPL does not necessarily agree with Strategic's statements in this petition, PPL has advised Strategic that it does not oppose Strategic's intervention and participation in this proceeding.

7. Strategic will be represented in this proceeding by the following counsel:

Daniel Clearfield, Esquire
Kevin J. Moody, Esquire
Wolf, Block, Schorr & Solis-Cohen LLP
212 Locust Street, Suite 300
Harrisburg, PA 17036
(717) 237-7160
DClearfield@wolfblock.com
KMoody@wolfblock.com

WHEREFORE, Strategic Energy L.L.C. respectfully requests the Presiding Officer to grant this Petition to Intervene.

Respectfully submitted,



Kevin J. Moody, Esquire
Wolf, Block, Schorr & Solis-Cohen LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

Attorneys for Strategic Energy L.L.C.

Date: June 4, 2004

1BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION :
V. :
PPL ELECTRIC UTILITIES CORP. :

DOCKET NO. R-00049255

SECRETARY'S BUREAU

2004 JUN -4 PH 3: 54

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CERTIFICATE OF SERVICE

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

VIA EMAIL & FIRST CLASS MAIL

Hon. Allison K. Turner
Administrative Law Judge
PA Public Utility Commission
1302 Philadelphia State Office Bldg.
Broad & Spring Garden Streets
Philadelphia, PA 19130

Paul E. Russell, Assoc. General Counsel
PPL
Two North Ninth Street
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Louise Knight, Esquire
Joseph Malatesta, Esquire
PPL Public Lighting User Group
Saul Ewing LLP
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Peter Adels, Esquire
Penn Future
117 South 17th Street, Suite 1801
Philadelphia, PA 19103

Richard Rathvon, President
MAPSA
c/o Reliant Energy Solutions
379 Thornall Street, 5th Floor
Edison (Metro Park), NJ 08837

Tracy McCormick
Executive Director
MAPSA
PO Box 6089
Harrisburg, PA 17112

Richard A. Kanaksie, Esquire
Office of Trial Staff
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

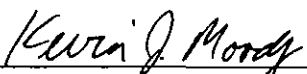
Mark C. Morrow, Esquire
UGI Utilities Inc.
460 North Gulph Road
King of Prussia, PA 19406

John L. Munsch, Esquire
Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601

Michael G. Wolfe, Esquire
Penn Power/Met-Ed/Pennelec
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

Thomas Niesen, Esquire
Patricia Armstrong, Esquire
Thomas Thomas Armstrong & Niesen
212 Locust Street, Suite 500
P.O. Box 9500
Harrisburg, PA 17108

Eric J. Epstein, Esquire
4100 Hilldale Road
Harrisburg, PA 17112



Kevin J. Moody, Esquire

Date: June 4, 2004



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Office of Administrative Law Judge

1302 Philadelphia State Office Building, 1400 W. Spring Garden St., Philadelphia, PA 19130

Telephone: (215) 560-2105

June 7, 2004

IN REPLY PLEASE
REFER TO OUR FILE

Jena Y. East
The GloRuss Group, LLC
P.O. Box 2424
Harrisburg, PA 17105-2424

PLEASE DOCKET

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-00049255

Dear Ms. East:

Thank you for formally requesting that notification of the public hearings regarding PPL and its proposed rate increase be given to your self and several other individuals. The Commission's regulations provide for two categories of participants known as active and inactive parties. Attached to this letter is a description of these two categories. Based on your request, I will include you and the others in the list of inactive parties. You will receive notices, including notices of the public input hearings. Those to be included are:

Jena Y. East, CEO
The GloRuss Group, LLC
P.O. Box 2424
Harrisburg, PA 17105-2424

Robert M. Jackson, Founder and CEO
African American Chamber of Commerce
1735 State Street
Harrisburg, PA 17103

Clare Jones, President
Harrisburg Area Branch of NAACP
P.O. Box 2757
Harrisburg, PA 17105-2757

Reverend Jimmy Allen Thomas
Wesley Union AME Zion
P.O. Box 5124
Harrisburg, PA 17110

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JUN 17 2004

**DOCUMENT
FOLDER**

Councilwoman Thompson has already been included based on her own individual letter of request.

Page Two
June 7, 2004

If you have any procedural questions or comments, please contact my office.

Very truly yours,

A handwritten signature in cursive script that reads "Allison K. Turner".

Allison K. Turner
Administrative Law Judge

AKT/mg
Attachment

Pc: Susan Licon, Scheduling Officer
Secretary's Bureau
Susan Colwell, Administrative Law Judge
Ember Jandebour, Administrative Law Judge

IMPORTANT INFORMATION FOR ALL PARTICIPANTS

Generally (All Participants)

Please note that under the PUC's regulations there are two classes of parties in this type of proceeding: "active" parties (those who wish to participate in such activities as cross-examination of witnesses and in submitting briefs and legal pleadings) and "inactive" parties (those who have an interest in being heard generally). All parties receive notices of hearings issued by the Commission and the administrative law judge assigned to the case. Only active parties, however, must be served with copies of the testimony, briefs, and other papers filed by the other parties in the proceeding. Parties are those persons who appear formally in the proceeding and have a direct interest in the subject matter.

If you wish to be considered an active party, you must either attend the prehearing conference, which in this case has already been held, or notify the presiding administrative law judge in writing prior to the prehearing conference that you would like to be included on the service list of active parties. If you miss the prehearing conference deadline, you may later seek active status by filing a Petition, but it will only be granted at the administrative law judge's discretion.

Those persons who are interested, but not formal participants, will be considered inactive parties, and will receive notices but no other documents. They may attend any public hearing but not participate, except at public input hearings where they may be heard.



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Office of Administrative Law Judge

1302 Philadelphia State Office Building, 1400 W. Spring Garden St., Philadelphia, PA 19130
Telephone: (215) 560-2105

IN REPLY PLEASE
REFER TO OUR FILE

June 7, 2004

PLEASE DOCKET

Honorable Linda D. Thompson, Vice President
Harrisburg City Council
M. L. King City Government Center
Suite 1
Harrisburg, PA 17101-1681

DOCKETED
JUN 17 2004

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-00049255

**DOCUMENT
FOLDER**

Dear Honorable Thompson:

Thank you for your letter formally requesting to be given notification of the hearings regarding PPL and its proposed rate increase. The Commission's regulations provide for two categories of participants known as active and inactive parties. Attached to this letter is a description of these two categories. Based on your request, I will include you in the list of inactive parties. You will receive notices, including notices of the public input hearings.

If you have any procedural questions or comments, please contact my office.

Very truly yours,

Allison K. Turner
Administrative Law Judge

AKT/mg
Attachment

Pc: Susan Licon, Scheduling Officer
Secretary's Bureau
Susan Colwell, Administrative Law Judge
Ember Jandebaur, Administrative Law Judge

IMPORTANT INFORMATION FOR ALL PARTICIPANTS

Generally (All Participants)

Please note that under the PUC's regulations there are two classes of parties in this type of proceeding: "active" parties (those who wish to participate in such activities as cross-examination of witnesses and in submitting briefs and legal pleadings) and "inactive" parties (those who have an interest in being heard generally). All parties receive notices of hearings issued by the Commission and the administrative law judge assigned to the case. Only active parties, however, must be served with copies of the testimony, briefs, and other papers filed by the other parties in the proceeding. Parties are those persons who appear formally in the proceeding and have a direct interest in the subject matter.

If you wish to be considered an active party, you must either attend the prehearing conference, which in this case has already been held, or notify the presiding administrative law judge in writing prior to the prehearing conference that you would like to be included on the service list of active parties. If you miss the prehearing conference deadline, you may later seek active status by filing a Petition, but it will only be granted at the administrative law judge's discretion.

Those persons who are interested, but not formal participants, will be considered inactive parties, and will receive notices but no other documents. They may attend any public hearing but not participate, except at public input hearings where they may be heard.



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

IN REPLY PLEASE
REFER TO OUR FILE

June 7, 2004

In Re: R-00049255
R-00049255C0001-C0005

(See attached list)

**DOCUMENT
FOLDER**

Pennsylvania Public Utility Commission (R-00049255)
U.S. Department of Defense & Federal Executive Agencies (C0001)
PPL Industrial Customer Alliance (C0002)
Office of Small Business Advocate (C0003)
Office of Consumer Advocate (C0004)
Eric Joseph Epstein (C0005)
v.
PPL Electric Utilities Corporation

PUBLIC INPUT HEARING NOTICE

This is to inform you that Public Input Hearings on the above-captioned case will be held as follows:

Date: Lancaster
Monday, June 28, 2004
Time: 2:00 p.m.
Location: Lancaster City Hall
City Council Chambers
100 South Queen Street
Lancaster, PA 17608

DOCKETED
JUN 11 2004

Presiding: Administrative Law Judge Susan D. Colwell will preside for this Public Input Hearing ONLY

Harrisburg

Date: Monday, June 28, 2004
Time: 7:00 p.m.
Location: Hearing Room 2
Plaza Level
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Presiding: Administrative Law Judge Susan D. Colwell will
preside for this Public Input Hearing ONLY

Bethlehem

Date: Tuesday, June 29, 2004
Time: 2:00 p.m.
Location: Town Hall
City Center Rotunda
10 East Church Street
Bethlehem, PA 18018

Presiding: Administrative Law Judge Allison K. Turner

Allentown

Date: Tuesday, June 29, 2004
Time: 7:00 p.m.
Location: Allentown City Hall
City Council Chambers
435 Hamilton Street
Allentown, PA 18101

Presiding: Administrative Law Judge Allison K. Turner

Scranton

Date: Wednesday, June 30, 2004
Time: 2:00 p.m.
Location: Scranton State Office Building
100 Lackawanna Avenue
Basement, B-3
Scranton, PA 18503

Presiding: Administrative Law Judge Ember S. Jandebaur will
preside for this Public Input Hearing ONLY

Wilkes-Barre

Date: Wednesday, June 30, 2004
Time: 7:00 p.m.
Location: Kings College
McGowan Hall
Corner of North River & West Union Streets
Wilkes-Barre, PA 18711
(Parking at Courthouse next door)

Presiding: Administrative Law Judge Ember S. Jandebaur will
preside for this Public Input Hearing ONLY

Presiding over entire case:

Administrative Law Judge Allison K. Turner
1302 Philadelphia State Office Building
1400 West Spring Garden Street
Philadelphia, PA 19130
Telephone: (215) 560-2105
Fax: (215) 560-3133

If you intend to file exhibits, 2 copies of all hearing exhibits to be presented into evidence must be submitted to the reporter. An additional copy must be furnished to the Presiding Officer. A copy must also be provided to each party of record.

Individuals representing themselves do not need to be represented by an attorney. All others (corporation, partnership, association, trust or governmental agency or subdivision) must be represented by an attorney. An attorney representing you should file a Notice of Appearance before the scheduled hearing date.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call the scheduling office at the Public Utility Commission:

- Scheduling Office: (717) 787-1399.
- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

pc: Chairman Fitzpatrick
Vice Chairman Bloom
Commissioner Thomas
Commissioner Pizzingrilli
Commissioner Holland
Judge Turner
Judge Colwell
Judge Jandebour
June Perry - LA, Keystone 3NW
Eric Levis - BPL, Keystone 3NE
Office of Trial Staff (2)
Consumer Advocate
Small Business Advocate
Susan Licon
Beth Plantz
Docket Section
Calendar File

R-00049255, R-00049255C0001-00005 Pennsylvania Public Utility Commission (R-00049255), U.S. Department of Defense & Federal Executive Agencies (C0001), PPL Industrial Customer Alliance (C0002), Office of Small Business Advocate (C0003), Office of Consumer Advocate (C0004), Eric Joseph Epstein (C0005) v. PPL Electric Utilities Corporation

✓ SCOTT J RUBIN ESQUIRE
THREE LOST CREEK DRIVE
SELINGROVE PA 17870

✓ PAUL E RUSSELL ESQUIRE
PPL
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

3 DAVID MACGREGOR ESQUIRE
MORGAN LEWIS & BOCKIUS LLP
ONE COMMERCE SQUARE
417 WALNUT STREET
PHILADELPHIA PA 19103-2921

✓ MICHAEL W GANG ESQUIRE
MORGAN LEWIS & BOCKIUS LLP
ONE COMMERCE SQUARE
417 WALNUT STREET
HARRISBURG PA 17101-1904

✓ JOHN H ISOM ESQUIRE
MORGAN LEWIS & BOCKIUS LLP
ONE COMMERCE SQUARE
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HARRISBURG PA 17101-1904

✓ JOSEPH L VULLO ESQUIRE
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FORTY FORT PA 18704-4237

✓ KENT D MURPHY ESQUIRE
EXELON BUSINESS SERVICES CO
2301 MARKET STREET S23-1
PO BOX 8699
PHILADELPHIA PA 19101-8699

✓ DAVID A MCCORMICK ESQUIRE
U S ARMY LEGAL SVCS AGENCY
901 NORTH STUART ST ROOM 713
ARLINGTON VA 22203-1837

✓ PAMELA C POLACEK
MCNEES WALLACE & NURICK LLC
100 PINE STREET
PO BOX 1166
HARRISBURG PA 17108-1166

✓ DAVID M KLEPPINGER ESQUIRE
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✓ STEVEN C GRAY ESQUIRE
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ADVOCATE
COMMERCE BUILDING SUITE 1102
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HARRISBURG PA 17101

✓ WILLIAM R LLOYD JR ESQUIRE
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✓ TANYA MCCLOSKEY ESQUIRE
OFFICE OF CONSUMER ADVOCATE
555 WALNUT STREET
5TH FLOOR FORUM PLACE
HARRISBURG PA 17101-1923

✓ JAMES A MULLINS ESQUIRE
OFFICE OF CONSUMER ADVOCATE
555 WALNUT STREET
5TH FLOOR FORUM LACE
HARRISBURG PA 17101-1923

✓ RICHARD A KANASKIE ESQUIRE
PA PUBLIC UTILITY COMMISSION
OFFICE OF TRIAL STAFF
PO BOX 3265
HARRISBURG PA 17105-3265

✓ RICHARD S HERSKOVITZ ESQUIRE
DUQUESNE LIGHT COMPANY
411 SEVENTH AVENUE
8TH FLOOR
PITTSBURGH PA 15219

✓ KAREN S MILLER ESQUIRE
MCNEES WALLACE & NURICK LLC
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HARRISBURG PA 17108-1166

✓ HON PHYLLIS MUNDY CHAIR
NORTHEAST DELEGATION
HOUSE BOX 202020
HARRISBURG PA 17120-2020

✓ ERIC JOSEPH EPSTEIN
4100 HILLSDALE ROAD
HARRISBURG PA 17112

✓ MICHAEL FIORENTINO ESQUIRE
CLEAN AIR COUNCIL
135 S 19TH STREET
SUITE 300
PHILADELPHIA PA 19103

✓ JOHN L MUNSCH ESQUIRE
ALLEGHENY POWER
800 CABIN HILL DRIVE
GREENSBURG PA 15601

✓ KEVIN J MOODY ESQUIRE
WOLF BLOCK SCHORR &
SOLIS-COHEN LLP
212 LOCUST STREET SUITE 300
HARRISBURG PA 17101

✓ MARK C MORROW ESQUIRE
UGI UTILITIES INC
460 NORTH GULPH ROAD
KING OF PRUSSIA PA 19406

Paul E. Russell
Associate General Counsel

PPL
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.4254 Fax 610.774.6726
perussell@pplweb.com



June 9, 2004

FEDERAL EXPRESS

DOCUMENT

James J. McNulty, Esquire
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

RECEIVED
JUN 09 2004
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying responses to interrogatories that PPL Electric Utilities Corporation served today on the active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Allison K. Turner

RECEIVED

JUN 09 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric :
Pa. P.U.C. No. 201 :

Docket No. R-00049255

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of the Office of Consumer Advocate, Set XII, Questions 1 through 10, upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

VIA FEDERAL EXPRESS

Irwin A. Popowsky, Esquire
James A. Mullins, Esquire
Office Of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923

William Lloyd, Esquire
Steven C. Grey, Esquire
Office Of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Johnnie Simms, Esquire
Richard A. Kanaskie, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 3rd Floor West
Harrisburg, PA 17120

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Pamela Polacek, Esquire
McNees, Wallace & Nurick
100 Pine Street
Harrisburg, PA 17108

David A. McCormick, Esquire
Regulatory Law Office (JALS-RL)
US Army Legal Services Agency
901 North Stuart Street, Room 713
Arlington, VA 22203-1837

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Selinsgrove, PA 17870-9357

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Attorney At Law
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Forty Fort, PA 18704-4237

Mr. Robert D. Knecht
Industrial Economics Incorporated
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Cambridge, MA 02140

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Exeter Associates
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Sustainable Development Fund
718 Arch Street, Suite 300 North
Philadelphia, PA 19106-1591

Stephen J. Baron, President
J. Kennedy and Associates, Inc.
570 Colonial Park Drive
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Eric Epstein
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Harrisburg, PA 17112

Eugene M. Brady
Commission on Economic Opportunity
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Wilkes-Barre, PA 18703-1127

Kent Murphy, Esquire
Legal Division
Exelon Business Services Company
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King of Prussia, PA 19406

Michael Fiorentino, Esquire
Joseph Otis Minott
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Richard S. Herskovitz, Esquire
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Peter Adels, General Counsel
Charley McPhedran, Senior Attorney
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2800 Pottsville Pike
Reading PA 19612-6001

Louise A. Knight, Esquire
Saul Ewing LLP
Penn National Insurance Tower
2 North Second Street, 7th Floor
Harrisburg, PA 17101

Dated: June 9, 2004



Paul E. Russell

Morgan, Lewis & Bockius LLP
One Commerce Square
417 Walnut Street
Harrisburg, PA 17101-1904
Tel: 717.237.4000
Fax: 717.237.4001
www.morganlewis.com

ORIGINAL

Morgan Lewis
COUNSELORS AT LAW

John H. Isom
717.237.4022
jisom@morganlewis.com

June 9, 2004

DOCUMENT
FOLDER

SECRETARY'S BUREAU

2004 JUN -9 PM 3:51

RECEIVED

VIA HAND DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-00049255**

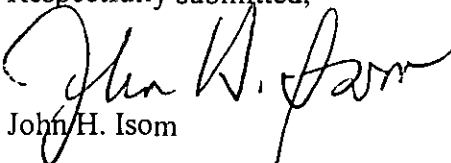
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the Objections of PPL Electric Utilities Corporation to Certain Interrogatories in Eric Epstein's Interrogatories, Set IV in the above-reference proceeding.

As indicated on the certificate of service, copies have been served on all parties of record.

If you have any questions concerning these matters, please contact me at the addresses or telephone numbers provided above.

Respectfully submitted,


John H. Isom

JHI/kms

Enclosures

cc: Certificate of Service

ORIGINAL

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

DOCKETED

JUL 26 2004

Pennsylvania Public Utility Commission

v.

PPL Electric Utilities Corporation

:
:
:
:
:

Docket No. R-00049255

**DOCUMENT
FOLDER**

**OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION
TO CERTAIN INTERROGATORIES IN
ERIC EPSTEIN'S INTERROGATORIES, SET IV**

PPL Electric Utilities Corporation ("PPL Electric") hereby objects, pursuant to 52 Pa. Code § 5.342, to certain written interrogatories included in Mr. Eric Joseph Epstein's Interrogatories, Set IV.

1. PPL Electric objects to Interrogatory No. 3 in Mr. Epstein's fourth set of interrogatories, which reads as follows:

"Interrogatory 3: Re: OTS: 47 & 49. (PPL, J.M. Kleha) Response to Interrogatories, Set 4, OTS, April 16, 2004). Please provide updated PURTA 'under payment' assessments to reflect:

"a) The Agreement (May, 2003) between Penn Manor and PPL Corp. over the Safe Harbor Water Power Co. worth \$500,000 in back taxes and about \$1 million more in property taxes over the next four years.

"b) The Agreement (December 5, 2003) between Northeastern School District and PPL Corp. on a property assessment of \$15 million for the Brunner Island power plant.

"c) The April 6 , 2004, decision from the Pike County Appeals court that saved PPL \$2.2 million dollars on interest and property taxes owed on taxes in arrears since 2000."

SECRETARY'S BUREAU

2004 JUN -9 PM 3: 51

RECEIVED

PPL Electric objects to this interrogatory on the grounds that it is irrelevant to this proceeding because it deals with various matters related to property taxes on facilities for

generation of electricity which are not owned by PPL Electric and which are not a subject of this proceeding. Because PPL Electric does not own the facilities mentioned in Interrogatory No. 3 of Mr. Epstein's fourth set of interrogatories, PPL Electric does not pay property taxes for such facilities and has made no claim for recovery of the property taxes on such facilities in this proceeding.

2. PPL Electric objects to Interrogatory No. 5 in Mr. Epstein's fourth set of interrogatories, which reads as follows:

"Interrogatory 5: Re-OCA 41. (PPL, J.R. Schadt, Response to Interrogatories, Set III, April 27, 2004)

"Please list by number and percentage, union and nonunion contractors identified in the 'Work by Other' category."

PPL Electric objects to this interrogatory on the grounds that it is irrelevant to the proceeding. PPL Electric chooses contractors based on price and reliability, not whether certain groups of the contractor's employees are unionized. Questions about whether PPL Electric's contractors' employees are unionized are simply beyond the scope of this proceeding. In addition to the foregoing, Interrogatory No. 5 of Mr. Epstein's fourth set of interrogatories is too vague and ambiguous to be answered in a meaningful manner. PPL Electric does not understand the percentage which Mr. Epstein is requesting in the interrogatory and PPL Electric does not understand the request for PPL Electric "list by number."

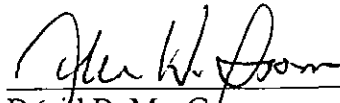
3. PPL Electric objects to Interrogatory No. 9 in Mr. Epstein's fourth set of interrogatories which reads as follows:

"Interrogatory 9: Re-OTS-124 , (J.R. Schadt, D.A. Krall, Response to Interrogatories, Set 12, May 4, 2004).

“Please revise the figures under PPL Corporation 2005, 2006, 2007 and 2008 Capital Budget, PPL Corporation 2004-2008 Capital Budget Service Group, PPL Corporation (including nuclear fuel) to reflect the costs savings achieved due to the March 8, 2004 contract with ANP to purchase six fuel batches with longer cycles and higher ‘burn up rates’.” (Footnote omitted.)

PPL Electric objects to this interrogatory on the grounds that it is irrelevant to this proceeding. The interrogatory asks for information that does not relate to PPL Electric’s rate proceeding. Instead, the interrogatory relates to future capital budgets of the holding company of PPL Electric and information related to purchases of nuclear fuel for generation of electricity at the Susquehanna Steam Electric Station. PPL Electric does not own or operate the Susquehanna Steam Electric Station its operating expenses in this proceeding.

Respectfully submitted,



David B. MacGregor
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jisom@morganlewis.com

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: June 9, 2004

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Associate General Counsel
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Office of General Counsel
Two North Ninth Street
Allentown, PA 18101-1179
Voice: 610.774.4254
Fax: 610.774.6726
E-mail: perussell@pplweb.com

Attorneys for PPL Electric
Utilities Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Objections of PPL Electric Utilities Corporation to Certain Interrogatories in Eric J. Epstein's Interrogatories, Set IV** upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

VIA E-MAIL AND FIRST-CLASS MAIL

Honorable Allison K. Turner
Administrative Law Judge
Pennsylvania Public Utility Commission
Philadelphia State Office Building
1400 West Spring Garden Street
Room 1302
Philadelphia, PA 19130

Tanya J. McCloskey, Esquire
James A. Mullins, Esquire
Lori A. Herman, Esquire
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Selinsgrove, PA 17870-9357

Eric Joseph Epstein
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Harrisburg, PA 17112

SECRETARY'S BUREAU

2004 JUN -9 PM 3:51

RECEIVED

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Commission on Economic Opportunity
165 Amber Lane
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Pittsburgh, PA 15219

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Charley McPhedran, Senior Attorney
Penn Future
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Robert D. Knecht
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Cambridge, MA 02140

Date: June 9, 2004



John H. Isom

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Morgan Lewis
C O U N S E L O R S A T L A W

ORIGINAL

John H. Isom
717.237.4022
jisom@morganlewis.com

June 11, 2004

VIA HAND DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RECEIVED
2004 JUN 11 PM 3:50
SECRETARY'S BUREAU

**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-00049255**

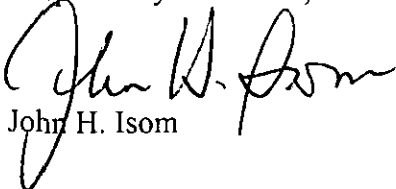
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the "Petition to Intervene of Strategic Energy L.L.C." in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on all parties of record.

If you have any questions concerning these matters, please contact me at the addresses or telephone numbers provided above.

Respectfully submitted,


John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

DOCUMENT
FOLDER

84

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

Pennsylvania Public Utility Commission, et al. :
 :
v. :
 :
PPL Electric Utilities Corporation :

Docket No. R-00049255

RECEIVED
2001 JUN 11 PM 3:51
SECRETARY'S BUREAU

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION
TO THE "PETITION TO INTERVENE OF STRATEGIC ENERGY L.L.C."**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the "Petition to Intervene of the Strategic Energy L.L.C." ("Petition").

1. Information concerning Strategic Energy, L.L.C. ("Strategic Energy") is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 1 of the Petition are therefore denied.

2. The averments of Paragraph No. 2 of the Petition are admitted.

3. The initial averments of Paragraph No. 3 of the Petition quote a portion of the Pennsylvania Public Utility Commission's ("Commission") regulation at 52 Pa. Code § 5.72(a). PPL Electric admits that Strategic Energy has quoted correctly a portion of the Commission's regulation. Other averments in Paragraph No. 3 of the Petition are conclusions of law to which no response is required. The remaining averments of Paragraph No. 3 of the Petition are speculative statements regarding the possible outcome of this proceeding, which PPL Electric cannot verify. Therefore, such averments are denied.

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4. Information concerning the membership of the Mid-Atlantic Power Supply Association is not reasonably available to PPL Electric, and therefore, such averments are denied. It is admitted that the Mid-Atlantic Power Supply Association has intervened in this proceeding. Information concerning the interests of Strategic Energy and the Mid-Atlantic Power Supply Association is not reasonably available to PPL Electric, and therefore, such averments are denied. Information concerning the business operations and interests of the several Intervenors in this proceeding is not reasonably available to PPL Electric, and therefore, such averments are denied.

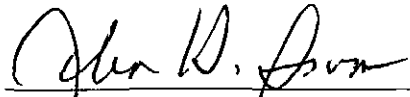
5. The averments of Paragraph No. 5 of the Petition are admitted.

6. The response to Paragraph No. 6 of the Petition, PPL does not object to intervention by Strategic Energy in this proceeding.

7. The averments of Paragraph No. 7 are admitted.

The remaining averments of the Petition are requests for relief to which no response is required. By way of further response, however, PPL Electric Utilities Corporation does not oppose the Petition of Strategic Energy L.L.C. to intervene in this proceeding.

Respectfully submitted,



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Of Counsel:

Morgan, Lewis & Bockius LLP

Date: June 11, 2004

Attorneys for PPL Electric
Utilities Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Answer of PPL Electric Utilities Corporation to the "Petition to Intervene of Strategic Energy L.L.C."** upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

VIA FIRST-CLASS MAIL

Honorable Allison K. Turner
Administrative Law Judge
Pennsylvania Public Utility Commission
Philadelphia State Office Building
1400 West Spring Garden Street
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Philadelphia, PA 19130

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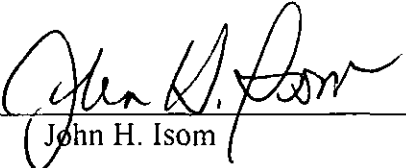
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Date: June 11, 2004



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June 11, 2004

VIA HAND DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-00049255**

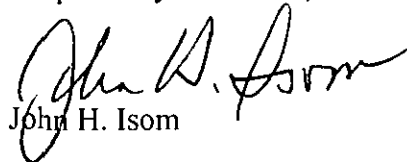
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the "Petition To Intervene Of Citizens For Pennsylvania Future Char Magaro, and Edward M. McGovern" in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on all parties of record.

If you have any questions concerning these matters, please contact me at the addresses or telephone numbers provided above.

Respectfully submitted,


John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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SECRETARY'S BUREAU

Pennsylvania Public Utility Commission, et al. :
:
v. :
:
PPL Electric Utilities Corporation :

Docket No. R-00049255

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO THE
"PETITION TO INTERVENE OF CITIZENS FOR PENNSYLVANIA'S
FUTURE, CHAR MAGARO, AND EDWARD M. McGOVERN"**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the "Petition to Intervene of Citizens For Pennsylvania's Future, Char Magaro, and Edward M. McGovern" ("Petition") as follows:

1. The averments of Paragraph No. 1 of the Petition are denied as stated. On March 29, 2004, PPL Electric filed Supplement No. 38 to Tariff – Electric Pa. P.U.C. No. 201 together with supporting data. Therein, PPL Electric proposed a general increase in base rates under Section 1308(d) of the Public Utility Code, 66 Pa.C.S. § 1308(d), together with other tariff changes, to become effective on January 1, 2005. The purposes of the filing are set forth in the "Statement of Reasons" that is contained in Exhibit Future 1, which is incorporated herein by reference.

2. The averments of Paragraph No. 2 of the Petition are denied as stated. Supplement No. 38 was suspended by operation of law until January 1, 2005. On May 7, 2004, the Pennsylvania Public Utility Commission ("Commission") initiated an investigation of PPL Electric's present and proposed rates.

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3. Information concerning Petitioner, Citizens for Pennsylvania's Future, d/b/a/ PennFuture, ("PennFuture") is not reasonably available to PPL Electric, and therefore, such averments are denied.

4. Information concerning PennFuture's membership is not reasonably available to PPL Electric, and therefore, such averments are denied.

5. The averments of Paragraph No. 5 of the Petition are admitted.

6. In Paragraph No. 6 of the Petition, PennFuture quotes a portion of the Commission's regulation at 52 Pa. Code § 5.72(a). PPL Electric admits that PennFuture has correctly quoted a portion of the Commission's regulation.

7. The averments of Paragraph No. 7 of the Petition are conclusions of law and argument to which no response is required. If it is determined that a response is required, such averments are denied. By way of further response, however, PPL Electric does not oppose intervention by PennFuture in this proceeding.

8. The averments of Paragraph No. 8 of the Petition are speculative statements concerning PennFuture's intended issues in this proceeding. As such, these statements are not verifiable by PPL Electric, and therefore, such averments are denied.

9. In Paragraph No. 9 of the Petition, PennFuture purports to reserve certain rights. PennFuture's rights, however, are determined pursuant to principles of law and the General Rules of Administrative Practice and Procedure. PennFuture's purported reservation of rights has no legal effect.

The remaining averments of the Petition are requests for relief to which no response is required. By way of further response, however, PPL Electric does not oppose intervention by PennFuture in this proceeding.

Respectfully submitted,



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Of Counsel:

Morgan, Lewis & Bockius LLP

Date: June 11, 2004

Attorneys for PPL Electric
Utilities Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Answer of PPL Electric Utilities Corporation to the "Petition to Intervene of Citizens For Pennsylvania's Future, Char Magaro, and Edward M. McGovern"** upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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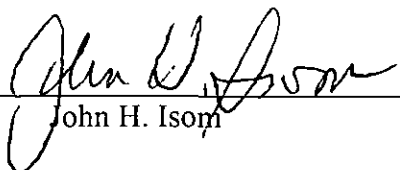
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Date: June 11, 2004



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June 11, 2004

VIA HAND DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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2004 JUN 11 PM 3:51
SECRETARY'S BUREAU

**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-00049255**

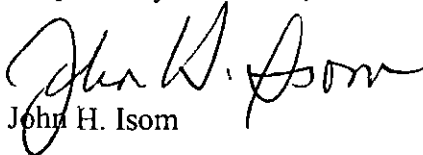
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the "Petition to Intervene of Pennsylvania Power Company, Metropolitan Edison Company, Pennsylvania Electric Company and American Transmission Systems, Incorporated" in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on all parties of record.

If you have any questions concerning these matters, please contact me at the addresses or telephone numbers provided above.

Respectfully submitted,


John H. Isom

JHI/jl
Enclosures
cc: Certificate of Service

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85

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

Pennsylvania Public Utility Commission, et al. :
:
v. :
:
PPL Electric Utilities Corporation :

Docket No. R-00049255

SECRETARY'S BUREAU
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**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION
TO THE "PETITION TO INTERVENE OF
PENNSYLVANIA POWER COMPANY,
METROPOLITAN EDISON COMPANY,
PENNSYLVANIA ELECTRIC COMPANY AND
AMERICAN TRANSMISSION SYSTEMS, INCORPORATED"**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the "Petition to Intervene of Pennsylvania Power Company, Metropolitan Edison Company, Pennsylvania Electric Company and American Transmission Systems, Incorporated" ("Petition") as follows:

1. The averments of Paragraph No. 1 of the Petition are denied as stated. It is admitted that on March 29, 2004, PPL Electric filed with the Pennsylvania Public Utility Commission ("Commission"), Supplement No. 38 to Tariff – Electric Pa. P.U.C. No. 201, together with supporting data, proposing, among other things, a distribution rate increase designed to produce approximately \$164.4 million in additional annual operating revenues, a Distribution System Improvement Charge and a pass-through of approximately \$57.2 million of increased transmission service expenses. It is admitted further that this proceeding is the first base rate proceeding filed by a major electric

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distribution company since the Electricity Generation Customer Choice and Competition Act, 66 Pa.C.S. Ch. 28, was enacted into law on December 3, 1996.

2. Information concerning FirstEnergy Corp. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 2 of the Petition are denied.

3. The averments of Paragraph No. 3 of the Petition are speculative statements regarding the possible interests of Pennsylvania Power Company, Metropolitan Edison Company and Pennsylvania Electric Company in this proceeding. PPL Electric, however, cannot verify these interests, and therefore, the averments of Paragraph No. 3 of the Petition are denied.

4. The averments of Paragraph No. 4 of the Petition are speculative statements regarding the possible outcome of this proceeding which PPL Electric cannot verify, and therefore, the averments of Paragraph No. 4 of the Petition are denied.

5. Information concerning Pennsylvania Power Company is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 5 of the Petition are denied.

6. Information concerning Metropolitan Edison Company is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 6 of the Petition are denied.

7. Information concerning Pennsylvania Electric Company is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 7 of the Petition are denied.

8. The averments of Paragraph No. 8 of the Petition are speculative statements regarding the possible outcome of this proceeding and its possible effect upon

petitioners. As such, PPL Electric cannot verify these statements, and therefore, the averments of Paragraph No. 8 of the Petition are denied.

9. The averments of Paragraph No. 9 of the Petition are admitted.

10. The averments of Paragraph No. 10 of the Petition are conclusions of law to which no response is required.

11. The averments of Paragraph No. 11 of the Petition are merely an *introduction to Paragraphs 12 through 14 of the Petition*. As such, the averments of Paragraph No. 11 are denied, and the averments of Paragraph Nos. 12 through 14 of this Answer are incorporated herein by reference.

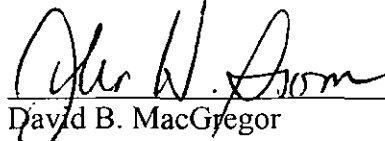
12. The averments of Paragraph No. 12 of the Petition are speculative statements regarding the possible outcome of this proceeding which PPL Electric cannot verify, and therefore, the averments of Paragraph No. 12 of the Petition are denied. By way of further response, however, PPL Electric does not object to intervention by Pennsylvania Power Company, Metropolitan Edison Company and Pennsylvania Electric Company in this proceeding.

13. The averments of Paragraph No. 13 of the Petition are argument, which PPL Electric cannot verify, and therefore, the averments of Paragraph No. 13 of the Petition are denied. By way of further response, however, PPL Electric does not object to intervention by Pennsylvania Power Company, Metropolitan Edison Company and Pennsylvania Electric Company in this proceeding.

14. The averments of Paragraph No. 14 of the Petition are requests for relief to which no response is required. By way of further response, however, PPL Electric does not object to intervention by Pennsylvania Power Company, Metropolitan Edison

Company and Pennsylvania Electric Company in this proceeding.

Respectfully submitted,



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Of Counsel:

Morgan, Lewis & Bockius LLP

Date: June 11, 2004

Attorneys for PPL Electric
Utilities Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Answer of PPL Electric Utilities Corporation to the "Petition to Intervene of Pennsylvania Power Company, Metropolitan Edison Company, Pennsylvania Electric Company and American Transmission Systems, Incorporated"** upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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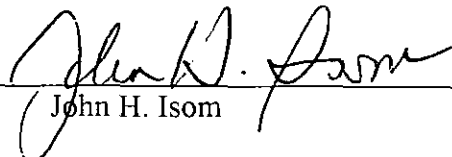
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Date: June 11, 2004



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June 11, 2004

VIA HAND DELIVERY

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SECRETARY'S BUREAU

2004 JUN 11 PM 3:49

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**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-00049255**

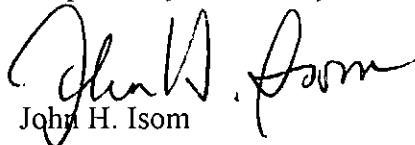
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the "Petition to Intervene of the PPL Public Lighting User Group" in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on all parties of record.

If you have any questions concerning these matters, please contact me at the addresses or telephone numbers provided above.

Respectfully submitted,


John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

DOCUMENT
FOLDER

83

ORIGINAL
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SECRETARY'S BUREAU

2004 JUN 11 PM 3:49

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Pennsylvania Public Utility Commission, et al. :
v. :
PPL Electric Utilities Corporation :

Docket No. R-00049255

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION
TO THE "PETITION TO INTERVENE OF
PPL PUBLIC LIGHTING USER GROUP"**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the "Petition to Intervene of the PPL Public Lighting User Group" ("Petition") as follows:

1. Information concerning the membership of the PPL Public Lighting User Group ("PLUG") is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 1 of the Petition are denied.

2. The averments of Paragraph No. 2 of the Petition are denied as stated. On March 29, 2004, PPL Electric filed Supplement No. 38 to Tariff – Electric Pa. P.U.C. No. 201, together with supporting data. There, PPL Electric proposed a general increase in base rates under Section 1308(d) of the Public Utility Code, 66 Pa.C.S. § 1308(d). PPL Electric's proposed increase in base rates is designed to produce \$164.4 million in additional annual operating revenues for distribution service. In addition, Supplement No. 38 is designed to pass-through charges that PPL Electric pays for transmission services it purchases under tariffs regulated by the Federal Energy Regulatory Commission. PPL Electric estimates that \$57.2 million of increased transmission service expenses will be passed through to customers under Supplement No. 38.

**DOCUMENT
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DOCKETED
JUN 17 2004

Supplement No. 38 was suspended by operation of law until January 1, 2005. On May 7, 2004, the Pennsylvania Public Utility Commission (“Commission”) instituted an investigation of PPL Electric’s present and proposed rates.

3. In response to Paragraph No. 3 of the Petition, it is admitted that PPL Electric proposes to increase rates for street lighting by approximately 9.9%, which is approximately the same percentage increase which PPL Electric has proposed for numerous other rate classes.

4. The averments of Paragraph No. 4 of the Petition are conclusions of law to which no response is required. By way of further response, however, PPL Electric does not oppose intervention by PLUG in this proceeding.

5. The averments of Paragraph No. 5 of the Petition are denied. To the contrary, all of PPL Electric’s proposed rates are just and reasonable and comply with all of the applicable provisions of the Public Utility Code.

6. The averments of Paragraph No. 6 of the Petition are denied. To the contrary, PPL Electric’s services meet all of the applicable requirements of the Public Utility Code and the Commission’s regulations.

7. The averments of Paragraph No. 7 of the Petition are denied. To the contrary, PPL Electric’s proposed rates are just and reasonable and comply with all applicable provisions of the Public Utility Code and the Commission’s regulations.

The remaining averments of the Petition are requests for relief to which no response is required. By way of further response, however, PPL Electric does not oppose intervention by PLUG.

Respectfully submitted,



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E-mail: perussell@pplweb.com

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: June 11, 2004

Attorneys for PPL Electric
Utilities Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Answer of PPL Electric Utilities Corporation to the "Petition to Intervene of PPL Public Lighting User Group"** upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

VIA FIRST-CLASS MAIL

Honorable Allison K. Turner
Administrative Law Judge
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Philadelphia State Office Building
1400 West Spring Garden Street
Room 1302
Philadelphia, PA 19130

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Lori A. Herman, Esquire
Aron J. Beatty, Esquire
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SECRETARY'S BUREAU

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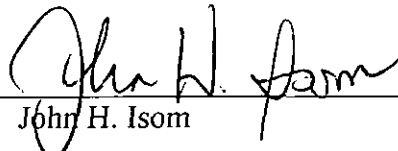
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✓ Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
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Date: June 11, 2004



John H. Isom



McNees Wallace & Nurick LLC
attorneys at law

**DOCUMENT
FOLDER**

PAMELA C. POLACEK
DIRECT DIAL: (717) 237-5368
E-MAIL ADDRESS: PPOLACEK@MWN.COM

June 11, 2004

VIA E-MAIL AND FIRST CLASS MAIL

Paul E. Russell, Esquire
Associate General Counsel
PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101-1179

**RE: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation;
Docket No. R-00049255**

Dear Mr. Russell:

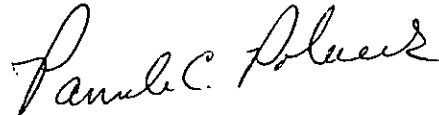
Please find enclosed two (2) copies of PP&L Industrial Customer Alliances' ("PPLICA") Interrogatories, Set III, to PPL Electric Utilities Corporation in the above-referenced proceeding.

Please endeavor to forward responses in an organized manner as they are completed; it is not necessary to await completion of all responses prior to forwarding those completed more quickly. Please forward one set of responses (including all attachments) to our office and one set of responses (including all attachments) to Mr. Stephen Baron of J. Kennedy & Associates, Inc.

Please communicate any objections or questions that you may have to these interrogatories as quickly as possible. Thank you for your attention to this matter.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

PCP/mp
Enclosures

c: ✓ James J. McNulty, Secretary (transmittal letter only)
Joseph M. Kleha (via e-mail only)
Certificate of Service

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SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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Certificate of Service
Page 3
Docket No. R-00049255

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Charley McPhedran, Senior Attorney
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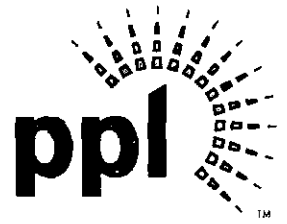
Pamela C. Polacek

Counsel to the PP&L Industrial
Customer Alliance

Dated this 11th day of June, 2004, at Harrisburg, Pennsylvania.

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June 14, 2004

FEDERAL EXPRESS

James J. McNulty, Esquire
Secretary
Pennsylvania Public Utility Commission
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JUN 14 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: **PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

**DOCUMENT
FOLDER**

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying responses to interrogatories that PPL Electric Utilities Corporation served today on the active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Allison K. Turner

BTL

THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric : Docket No. R-00049255
Pa. P.U.C. No. 201 :

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CERTIFICATION OF SERVICE

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of the Clean Air Council, Set 2, Questions CAC2-1 through CAC2-20, upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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2 North Second Street, 7th Floor
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Dated: June 14, 2004



Paul E. Russell

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JUN 14 2004
PA PUBLIC UTILITY COMMISSION
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June 14, 2004

FEDERAL EXPRESS

James J. McNulty, Esquire
Secretary
Pennsylvania Public Utility Commission
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Harrisburg, Pennsylvania 17120

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JUN 14 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**DOCUMENT
FOLDER**

**Re: PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying responses to interrogatories that PPL Electric Utilities Corporation served today on the active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Allison K. Turner

BTL

THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric : Docket No. R-00049255
Pa. P.U.C. No. 201 :

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CERTIFICATION OF SERVICE

JUN 14 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of the Office of Trial Staff, Set 19, Questions OTS-RE-137 through OTS-RE-144, upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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Penn National Insurance Tower
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Harrisburg, PA 17101

Dated: June 14, 2004



Paul E. Russell

Paul E. Russell
Associate General Counsel

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June 14, 2004

FEDERAL EXPRESS

James J. McNulty, Esquire
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Harrisburg, Pennsylvania 17120

RECEIVED

JUN 14 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: **PPL Electric Utilities Corporation**
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255

**DOCUMENT
FOLDER**

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying responses to interrogatories that PPL Electric Utilities Corporation served today on the active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Attachment

BTL

cc: The Honorable Allison K. Turner

THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric : Docket No. R-00049255
Pa. P.U.C. No. 201 :

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JUN 14 2004

CERTIFICATION OF SERVICE

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of the Public Lighting User Group, Set I, Questions 1 through 34, upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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Dated: June 14, 2004



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JUN 14 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: **PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

**DOCUMENT
FOLDER**

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying responses to interrogatories that PPL Electric Utilities Corporation served today on the active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Allison K. Turner

BTL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric : Docket No. R-00049255
Pa. P.U.C. No. 201 :

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JUN 14 2004

CERTIFICATION OF SERVICE

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of Eric Epstein, Set II, Questions 1 (Revised), 3 (Revised) and 19 (Revised); Set III, Questions 1 through 5 (Revised) and Questions 6 through 9 (Revised); and Set IV, Questions 1 through 9, upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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Dated: June 14, 2004



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June 16, 2004

VIA HAND DELIVERY

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DOCUMENT
FOLDER

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation;
Docket No. R-00049255; **AMENDED APPENDIX "A" TO THE PPL
PUBLIC LIGHTING USER GROUP'S PETITION TO INTERVENE**

Dear Mr. McNulty:

Enclosed for filing please find an original and three (3) copies of Amended Appendix "A" to the PPL Public Lighting User Group's Petition to Intervene in the above-referenced matter.

Please date-stamp the extra copy and return with our messenger service. Please feel free to call with any questions regarding this filing. Thank you in advance for your cooperation.

Sincerely,

Louise A. Knight

LAZ:clj
Enclosure

c: Per Certificate of Service

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2004 JUN 16 PM 3:40
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56

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission
et al.,

Complainants

v.

Docket No. R-00049255

PPL Electric Utilities Corporation

Respondent

DOCKETED
JUL 19 2004

AMENDED APPENDIX "A"
TO THE PPL PUBLIC LIGHTING USER GROUP'S
PETITION TO INTERVENE

**DOCUMENT
FOLDER**

The PPL Public Lighting User Group ("PLUG"), by its counsel in this matter, Saul Ewing LLP, hereby amends Appendix "A" which was originally filed with PLUG's Petition to Intervene on May 19, 2004. Below is a list of the composition of PLUG members as of June 15, 2004:

City of Harrisburg, Dauphin County
Hampden Township, Cumberland County
Derry Township, Dauphin County
Borough of Steelton, Dauphin County
Borough of Hummelstown, Dauphin County
Pennsylvania Turnpike Commission

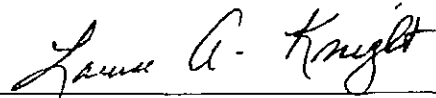
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Respectfully submitted,

SAUL EWING LLP



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Dated: June 16, 2004

Attorneys for PPL Public Lighting
User Group

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a copy of the foregoing document upon the participants listed below in accordance with the requirement of Section 1.54 (relating to service by a participant).

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Dated: June 16, 2005

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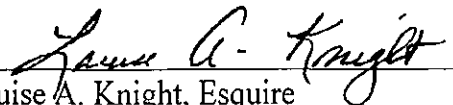
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June 18, 2004

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JUN 18 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

DOCUMENT
FOLDER

Re: **PPL Electric Utilities Corporation
Supplement No. 38 to Tariff -
Electric Pa. P.U.C. No. 201
Docket No. R-00049255**

Dear Mr. McNulty:

Attached for filing, pursuant to the Commission's regulations, 52 Pa. Code § 5.342(d), is a Certificate of Service identifying responses to interrogatories that PPL Electric Utilities Corporation served today on the active participants in this proceeding.

If you have any questions regarding these responses, please call.

Very truly yours,

Paul E. Russell

Attachment

cc: The Honorable Allison K. Turner

BTL

THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Supplement No. 38 to Tariff – Electric : Docket No. R-00049255
Pa. P.U.C. No. 201 :

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JUN 18 2004

CERTIFICATION OF SERVICE

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Interrogatories of the Office of Trial Staff, Set 20, OTS-RE-145 through OTS-RE-150, upon the participant(s) listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

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Dated: June 18, 2004



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission
et al.,

Complainants

v.

Docket No. R-00049255

PPL Electric Utilities Corporation,
Respondent

04 JUN 18 AM 10:20
SECRETARY'S BUREAU

DOCKETED
JUL 07 2004

ORDER RE: PUBLIC LIGHTING USERS GROUP'S "NOTICE OF DEPOSITION" OF
JOSEPH M. KLEHA, OLIVER G. KASPER and DOUGLAS A. KRALL

**DOCUMENT
FOLDER**

On May 26, 2004, Public Lighting User's Group (PLUG) filed a Notice of Deposition with PPL to take depositions of three witnesses who authored testimony on behalf of PPL.

On June 3, 2004, PPL filed its Objections to the Notice.

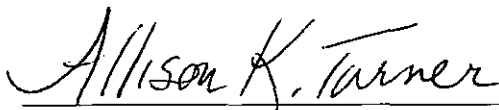
By email on June 3, 2004, the ALJ requested that PLUG and PPL discuss their discovery dispute and try to accommodate each other.

On June 7, 2004, the ALJ learned that the parties had actually resolved some of their differences; that other means of discovery would be utilized; and, that PLUG was no longer pursuing depositions.

Therefore, this Application may be denied as moot.

ORDER

1. The Notice of Depositions filed by PLUG against PPL at this docket is hereby declared moot.



Allison K. Turner,
Administrative Law Judge

Date: June 16, 2004

Pennsylvania Public Utility Commission, U.S. Department of Defense & Federal, Executive Agencies, PPL Industrial Customer Alliance, Office of Small Business Advocate, Office of Consumer Advocate, Eric Joseph Epstein v. PPL Electric Utilities Corporation
Docket Nos. R-00049255, R-00049255C0001-C0005

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