

ORIGINAL

September 8, 2004

VIA FIRST CLASS MAIL

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

DOCUMENT  
FOLDER

SECRETARY'S BUREAU

01 SEP - 9 AM 8:33

Re: Pennsylvania Public Utility Commission *et al.* v. PPL Electric Utilities Corporation; Docket No. R-00049255 *et al.*; **CORRECTION ON PAGE 1 OF PPL PLUG MAIN BRIEF**

Dear Mr. McNulty:

Enclosed for your review is an original and nine copies of the corrected page 1 of the Main Brief of PPL PLUG submitted September 2, 2004. The number indicated on the last sentence of page 1 has been corrected to read "4,300" instead of "43,000."

Should you have further questions or concerns, please do not hesitate to contact me.

Very truly yours,



Louise A. Knight

LAK/clj  
Enclosures

c: As Per Certificate of Service

29

## I. PROCEDURAL HISTORY AND SUMMARY OF TESTIMONY

The PPL Public Lighting Users Group (“PPL PLUG”) concurs with the procedural history as progressively detailed throughout Your Honor’s Prehearing Orders and as supplemented to include hearings and filing of briefs. Summaries of the testimony of PPL PLUG witnesses is attached to this Brief as **Appendix A**.

## II. SUMMARY OF THE ARGUMENT

PPL’s street lighting (“SL/AL”)<sup>1</sup> customers use electricity to provide the public benefit of illuminating streets and communities. The public benefits are several but primary are public safety and security. Providers of public lighting are not the direct beneficiaries of the service. Rather, the benefits of street lighting accrue to the public; street lighting has a value to society at large. Raising street lighting rates will not send price signals to SL/AL customers that will lead to conservation precisely because this service is a necessary public good and is not elastic.

Traffic signal lighting is also a public service that is critical to the public safety and welfare. Unlike street lighting, the vast majority of traffic signal lighting is not served under separate rate classifications. PPL includes traffic signal lighting in its general service class.

PPL serves street lighting customers under several tariff rates (SA, SE<sup>2</sup>, SHS, SM, and SR-1), all of which are consolidated for purposes of its cost of service study. SL/AL is unmeasured electric service. Flat base rate charges are predicated on an estimated 4,300 hours of use per fixture, per year.

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<sup>1</sup> Street lighting is referred to as SL/AL in PPL’s supporting documents and that abbreviation is used in this Brief.

<sup>2</sup> SE customers buy energy only.

**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving a copy of CORRECTED PAGE 1 of PPL PLUG MAIN BRIEF upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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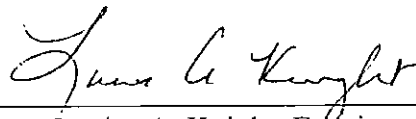
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Dated: September 8, 2004



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