



DEPARTMENT OF THE ARMY
 UNITED STATES ARMY LEGAL SERVICES AGENCY
 901 NORTH STUART STREET
 ARLINGTON VA 22203-1837

ORIGINAL



REPLY TO
 ATTENTION OF

Regulatory Law Office
 U 4120

2 April 2004

SUBJECT: Pennsylvania Public Utility Commission vs. PPL Electric Utilities
 Corporation, Pennsylvania P.U.C. Docket No. R-00049255 C0001

RECEIVED

APR 02 2004

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

PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

DOCUMENT
 FOLDER

Dear Mr. McNulty:

In accord with 52 Pa. Code § 1.37, enclosed for filing are the original and three copies of the Complaint on behalf of the consumer interest of the United States Department of Defense and other affected Federal Executive Agencies in the above referenced proceeding. Also enclosed find a computer disk with a copy of this document in Microsoft Word in a file entitled "DOD.doc."

Copies of this document are being sent in accord with the Certificate of Service. Inquiries to this office regarding this proceeding should be directed to the undersigned at (703) 696-1646.

Sincerely,

David A. McCormick
 General Attorney
 Regulatory Law Office

140

ORIGINAL

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission et al.)
vs.)
PPL Electric Utilities Corporation) Docket No. R 00049255 C 0001

RECEIVED

APR 02 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

COMPLAINT

DOCUMENT
FOLDER

Robert N. Kittel
Chief
Regulatory Law Office
U.S. Army Legal Services Agency
Department of the Army
DAJA-RL 4120
901 North Stuart Street, Room 713
Arlington, VA 22203-1837

For

THE DEPARTMENT OF DEFENSE AND
THE FEDERAL EXECUTIVE AGENCIES

David A. McCormick
Attorney

Of Counsel

DOCKETED
APR 19 2004

Dated: 2 April 2004

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission et al.)
vs.)
PPL Electric Utilities Corporation) Docket No. R 00049255

COMPLAINT

I

The Secretary of Defense, through duly authorized counsel, on behalf of the consumer interest of the United States Department of Defense and other affected Federal Executive Agencies (collectively herein after “DOD”) ¹ tenders this complaint and seeks to intervene in the above-styled application proceeding of the PPL Electric Utilities Corporation (hereinafter PPL).

II

That the name of the utility involved in this Complaint is PPL Electric Utilities Corporation (hereinafter PPL).

III

That the name, address, telephone and facsimile copier numbers, and e-mail of the attorney to whom communications in regard to this petition should be addressed is:

¹ DOD has been delegated authority by the General Services Administration to represent, through Department of the Army counsel, the consumer interest of all the Federal Executive Agencies in this proceeding under 40 U.S.C.A. §§481(a)(4) and 486(d). See also: 48 CFR § 41.101.

David A. McCormick
Regulatory Law Office
U.S. Army legal Services Agency
DAJA-RL 4120
901 N. Stuart Street, Room 713
Arlington, VA 22203-1837

Telephone: (703) 696-1646
FAX: (703) 696-2960
E-mail: David.Mccormick@hqda.army.mil

IV

That the DOD maintains military installations and civilian activities within the Commonwealth of Pennsylvania a number of which are served by PP&L. PP&L proposes in this application to increase its rates and charges for electric delivery service of \$164.4 million and electric transmission service of \$57.2 million to increase annual jurisdictional utility revenues by approximately \$221.6 million.

V

The major federal installations served by PPL are the Scranton Army Ammunition Plant, Tobyhanna Army Depot, the Naval Supply Depot at Mechanicsburg, the Defense Logistics Agency at New Cumberland, and Carlisle Barracks. PPL serves offices of civilian federal agencies such as the United States Courthouses in Harrisburg and Scranton, Veterans Affairs Hospital and a federal penitentiary. Electric billings to the installations of the Department of the Army, alone, in calendar 2003 total about \$8,000,000, annually. The consumer interest of DOD is manifest.

VI

Usage characteristics, and mix of rate schedules upon which DOD facilities buy electric service make DOD usage distinct. DOD facilities received most electric utility distribution service on Rate LP-5. and some on Rate LP-4. The largest DOD customer

installations have a large investment in electric distribution plant similar to a municipal utility. DOD installations are served at higher voltages than most other customers. DOD installations have a moderate load factor, and a load curve somewhat distinct from other high voltage customers of PPL. DOD is a customer with a significant economic interest in this proceeding and would be affected by its outcome. The interest of the DOD is such that it cannot be adequately protected by any other party. To the knowledge of the undersigned, it has never been found appropriate to “group” the consumer interest of DOD with any other party to curtail federal cross-examination.² The undersigned suggests that a cursory inquiry of other counsel in this proceeding (some of whom were in prior PPL rate cases) should indicate that DOD counsel is overly not prone to ask redundant, irrelevant or “friendly” cross examination questions which might delay hearings, or unduly bolster the record. Granting of intervention of DOD will neither unduly broaden the issues nor unduly delay the proceeding.³ If briefs are permitted, DOD plans to brief the issues in this proceeding, and to participate in cross examination, if necessary, at hearings.

VII

That DOD has not at this time fully reviewed the minutia of the entire PPL rate filing in this proceeding. There may be reason to question overall costs of service as put

² See also: United States vs. Public Service Commission of Maryland, 422 FSupp 676 (1976).

³ DOD has regularly appeared in rate and other proceedings before the Pennsylvania Public Utility Commission involving issues of concern to DOD. See: Application of Pennsylvania Power & Light Co. for a Restructuring Plan under Section 2806, Pa. PUC Docket No. R-00973954, 1998 Pa. PUC LEXIS 129.131,173,193 (1998); Investigation into Electric Power Competition, Pa. PUC Docket No. I 940032, dated 3 July 1996, Pa. PUC v. Pennsylvania Power & Light Co. Docket No. R 943271 (September 27, 1995); Pa. PUC v. West Penn Power Company, Docket No. R 942986, 29 December 1994, 1994 Pa. PUC LEXIS 144; Pa. PUC v. West Penn Power Company, Docket No. R 901609, 73 Pa. PUC 454, 119 P.U.R. 4th 110 (December 13, 1990); Pa. PUC v. West Penn Power Company, Docket R 850220, 77 P.U.R. 4th 220 (July 24, 1986); Pa. PUC v. West Penn Power Company, 69 P.U.R. 4th 470 (August 28, 1985); Pa. PUC v. Pennsylvania Power & Light Co. Docket No. R 842651, 59 Pa. PUC 332, 67 P.U.R. 30 (April 25, 1985); Pa. PUC v. Pennsylvania Power & Light Company Docket No. R 822169, 55 P.U.R. 4th 185 (August 19, 1983).

forward in the future test period filing by PPL. DOD does not believe PPL has fully justified the entire requested increase of \$221.6 million in revenues. Major issues are likely to be return on equity capital, revenue and cost accounting, class cost of service and rate design issues. PPL seeks an 11.5 percent return on equity which appears to be excessive given current low interest rates prevailing in financial markets.⁴ Uncertainty exists regarding the reasonableness and impacts of accounting treatment in the PPL filing of both depreciation and expenses of operation and maintenance involved with investment in automated meter reading (AMR) equipment. DOD has not yet fully analyzed all of PPL's proposed accounting actions in the rate filing. There may be points of both agreement and disagreement with PPL on accounting issues.

VIII

That there appear to be conceptual improvements in the PPL class cost of service analysis, reflecting that transmission and distribution utility costs are wholly customer or demand related. However, PPL Witness Oliver G. Kasper acknowledges that he has only made a limited effort in this proceeding to move relative class rates of return toward unity with the overall proposed authorized return.⁵ DOD needs further review of PPL's proposed Distribution System Improvement Charge (DSIC) to ascertain the reasonableness of this rate design initiative.⁶ There is uncertainty that cost incurrence has a close nexus to the proposed rate design structure for cost recovery under that initiative. DOD has not had time to fully analyze the reasonableness of the nuances of the PPL class cost of service methodology. DOD reserves the right to question the rate design and cost and

⁴ PPL Statement No. 9, direct testimony of Witness Paul R. Moul, p. 1, line 19 to p. 2, line 6, and PPL Statement No. 2, direct testimony of Witness Joseph R. Schadt, p. 9, lines 3-7.

⁵ PPL Statement No. 6, direct testimony of Witness Oliver G. Kasper, p. 8, line 19 to page 9, line 5.

⁶ PPL Statement No. 5, direct testimony of Witness Douglas A. Krall, p. 35 line 7 to p. 39, line 6.

revenue allocation methods of the utility, or others, if necessary in the proceeding.

Whether DOD will sponsor witnesses in this proceeding is uncertain. If one or more expert witnesses are sponsored, it is likely that Mr. Thomas J. Prisco on revenue accounting issues and Mr. Kenneth L. Kincel on equity return and rate design issues would be among the DOD witnesses. Mr. Prisco has offered testimony in several prior utility rate proceeding before this Commission. Both expert witnesses have testified before a number of other regulatory tribunals.

WHEREFORE, DOD requests that the Commission, after an investigation approve only just and reasonable electric utility rates in this proceeding and that DOD be granted leave to intervene and be treated as a party hereto with right to have notice of and appear at the taking of testimony, produce and cross examine witnesses, and be heard through counsel, upon brief and at oral argument, if oral argument is granted.

By,



David A. McCormick
Attorney I.D. No. 17357

Regulatory Law Office
U.S. Army Legal Services Agency
Department of the Army (DAJA-RL 4120)
901 North Stuart Street, Room 713
Arlington, VA 22203-1837

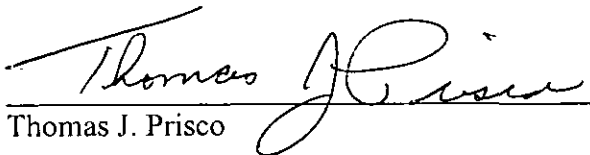
For

THE DEPARTMENT OF DEFENSE AND
FEDERAL EXECUTIVE AGENCIES

AFFIDAVIT

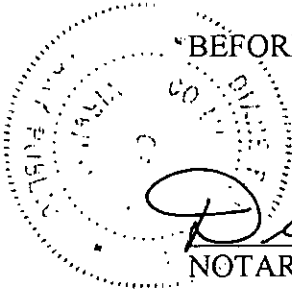
COUNTY OF ARLINGTON)
)
) S.S.
)
COMMONWEALTH OF VIRGINIA)

I am Thomas J. Prisco, Staff Accountant in the Regulatory Law and Intellectual Property Division of United States Army Legal Services Agency and I certify that I have read the foregoing document and that it is true and correct to the best of my knowledge information and belief.


Thomas J. Prisco

SWORN TO AND SUBSCRIBED TO

BEFORE ME, THIS 2nd DAY OF APRIL 2004.




NOTARY PUBLIC

My Commission Expires April 30, 2004

RECEIVED

APR 02 2004

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION
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)

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing document to be sent this day,
by first class, postage prepaid U.S. Mail (or private courier) to the following addressees:

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

William Lloyd, Esquire
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Johnnie Simms, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 3d Floor West
Harrisburg, PA 17120

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

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

Scott Rubin, Esquire
3 Lost Creek Drive
Selinsgrove, PA 17870-9357

Mr. Stephen J. Barron, President
J. Kennedy and Associates, Inc.
570 Colonial Park Drive, Suite 305
Roswell, GA 30075

Mr. Eric Epstein
4100 Hillside Drive
Harrisburg, PA 17112

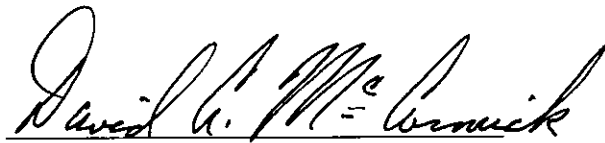
CPT Marcus A. Streips
ATTN: AMSEL-TY-LO
Tobyhanna Army Depot
11 Hap Arnold Boulevard
Tobyhanna, PA 18466-5054

Post Judge Advocate
Carlisle Barracks – U.S. Army Garrison
ATTN: ATZE-PJA
45 Ashburn Drive, Room 21
Carlisle, PA 17103-5009

Naval Facilities Engineering Command
NAVY RATE INTERVENTION (Mr. Sam De Frawi)
1314 Harwood Street, S.E.
WASHINGTON NAVY YARD
WASHINGTON, DC 20374-5018

Office of General Counsel OGC-LRD
GENERAL SERVICES ADMINISTRATION
18th and F Streets, N.W.
WASHINGTON, DC 20405

Dated this 2^d day of April, 2004 at Arlington County, Virginia.


David A. McConick

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

APRIL 14, 2004

PAUL E RUSSELL, ASSOCIATE GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

DOCUMENT
FOLDER

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0001

Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by UNITED STATES DEPARTMENT OF DEFENSE AND THE FEDERAL EXECUTIVE AGENCIES.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

DOCKETED
APR 19 2004

Very truly yours,

James J. McNulty

James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbs



McNees Wallace & Nurick LLC
attorneys at law

ORIGINAL

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

April 6, 2004

**DOCUMENT VIA HAND DELIVERY
FOLDER**

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

**Re: PP&L Industrial Customer Alliance v. PPL Electric Utilities Corporation;
Docket No. R-00049255C0002**

Dear Secretary McNulty:

Enclosed for filing with the Commission are the original and three (3) copies of the Complaint of the PP&L Industrial Customer Alliance ("PPLICA") in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of this transmittal letter and kindly return it for our filing purposes.

Very truly yours,

MCNEES WALLACE & NURICK LLC

By *Pamela C. Polacek*
Pamela C. Polacek

Counsel to PP&L Industrial Customer Alliance

KSM/mc
Enclosures

- c: The Honorable Allison K. Turner, Administrative Law Judge
(via fax and first class mail)
- Ms. Elzalena Ditzler, Administrative Officer (via hand delivery)
- Certificate of Service

RECEIVED
 2004 APR -6 PM 3:55
 SECRETARY'S BUREAU

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PP&L INDUSTRIAL CUSTOMER ALLIANCE :

v. :

PPL ELECTRIC UTILITIES CORPORATION :

DOCKET NO. R-00049255C 0002

SECRETARY'S BUREAU

104 APR - 5 PM 3: 55

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**DOCUMENT
FOLDER**

COMPLAINT

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Section 701 of the Pennsylvania Public Utility Code, 66 Pa.C.S.A. § 701, and Sections 5.21 and 5.22 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") regulations, 52 Pa. Code §§ 5.21 & 5.22, the PP&L Industrial Customer Alliance ("PPLICA") hereby complains against the proposed Supplement No. 38 to Tariff - Electric Pa. P.U.C. No. 201 of PPL Electric Utilities Corporation ("PPL" or "Company"), by which PPL requests an increase in the Company's distribution base rates under Section 1308 of the Public Utility Code, 66 Pa. C.S.A. § 1308, and the operative provisions of the Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S.A. §§ 2801 et seq. ("Competition Act"). In support thereof, PPLICA states as follows:

1. The Complainant is PPLICA, the tentative membership of which is listed in Appendix "A" attached hereto. PPLICA will update Appendix "A" during this proceeding, as necessary.

DOCKETED
APR 19 2004

2. The names and address of the Complainant's attorneys are:

David M. Kleppinger
Pamela C. Polacek
Karen S. Miller
McNEES WALLACE & NURICK LLC
100 Pine Street
P. O. Box 1166
Harrisburg, PA 17108-1166
Phone: (717) 232-8000
Fax: (717) 237-5300
dkleppin@mwn.com
ppolacek@mwn.com
kmiller@mwn.com

All correspondence in this proceeding from the Commission should be directed to the attention of Pamela C. Polacek at the address listed above. In addition, PPLICA has retained the firm of J. Kennedy and Associates, Inc., as its consultant in this proceeding. Copies of all pleadings, testimony, discovery, and orders should be directed to PPLICA's consultant as follows:

Stephen J. Baron
J. Kennedy and Associates, Inc.
570 Colonial Park Drive
Suite 305
Roswell, GA 30075

3. The Respondent utility is:

PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101-1179

4. On March 29, 2004, PPL filed with the Commission Supplement No. 38, proposed to become effective on June 1, 2004. By this filing, PPL requests a distribution rate increase of approximately \$164.4 million, or 31% over the Company's present annual distribution revenues, and a proposed return on equity of 11.5%. The Company states that the requested distribution rate increase is necessary in order to improve the Company's system, connect new customers, meet rising

business costs, and fund expanded social and environmental programs including, among others, a Community Betterment Initiative ("CBI") and the Sustainable Energy Fund ("SEF"). PPL's filing also informs the Commission of an estimated \$57.2 million increase in the Company's transmission rates, which PPL proposes to automatically pass through to customers beginning January 1, 2005, through application of a Transmission Service Charge ("TSC") on a kWh basis to all customers taking Provider of Last Resort service from PPL. The combination of the Company's distribution rate increase request, if approved, and the pass through of the TSC would produce an overall rate increase of approximately 8.1%. In addition, PPL proposes to implement a Distribution System Improvement Charge ("DSIC"), through which the Company would recover from ratepayers the costs of certain distribution system improvement and relocation projects between base rate proceedings. In support of Supplement No. 38, PPL has filed and served supporting testimony that purports to validate the Company's claim for a \$164.4 million distribution rate increase and the other elements of the Company's proposal.

5. This Complaint is directed against the rates, terms, and provisions contained in Respondent's Supplement No. 38.

6. PPLICA is an ad hoc association of energy-intensive industrial customers receiving electric service in PPL's service territory. PPLICA members purchase service from PPL primarily under Rate Schedules LP-4, LP-5, LP-6, IS-P, and IS-T, as well as available riders. These Rate Schedules and Rate Schedules LPEP, IS-M, and Standby make up the Large Commercial and Industrial Class for purposes of PPL's distribution base rate filing. PPLICA members collectively consume approximately 2 billion kWh of electricity annually in manufacturing and other operational processes, and electricity costs comprise a significant portion of their production costs. PPLICA was an active party in PPL's Restructuring Proceeding pursuant to the Competition Act, during which the

Company's initial unbundled distribution and transmission rates were established. As a result of PPL's distribution base rate filing, the distribution and transmission rates to be paid by PPLICA members will be changed. As PPL's largest retail customers, PPLICA members have an interest in this proceeding that is not represented by any other party of record; consequently, PPLICA satisfies the standards for intervention under Section 5.72 of the Commission's regulations. See 52 Pa. Code § 5.72.

7. Complainant alleges that the information and data filed in support of the proposed rates and tariff revisions in PPL's Supplement No. 38 are insufficient to establish that the proposed rates are just, reasonable, and nondiscriminatory, as required by Sections 1301 and 1304 of the Public Utility Code, 66 Pa.C.S.A. §§ 1301 & 1304.

8. Pursuant to Section 315 (a) of the Public Utility Code, 66 Pa. C.S.A. § 315 (a), PPL has the burden of proving that its proposed rates are just and reasonable and otherwise in accord with Section 1301 of the Public Utility Code, 66 Pa. C.S.A. § 1301.

9. PPLICA's preliminary review of the Company's filing indicates the need for Commission investigation into at least the following issues:

- (a) whether the size of the requested rate increase is appropriate;
- (b) whether the expenses claimed by PPL were prudently incurred;
- (c) whether the allocation of the proposed distribution rate increase between and among customer classes is just, reasonable and non-discriminatory;
- (d) whether PPL's proposed rate structure and rate design are appropriate;
- (e) whether the 11.5% return on equity proposed by PPL and other aspects of the Company's proposal result in a fair rate of return;
- (f) whether PPL's claimed cost of service is accurate, legitimate and appropriately allocated;

- (g) whether PPL's proposed funding of certain social programs, including the CBI and the SEF, is appropriate;
- (h) whether PPL's proposed application and design of the TSC is appropriate, just and reasonable; and
- (i) whether PPL's proposed implementation of a DSIC is appropriate and lawful.


PPLICA reserves the right to raise and address other issues of concern upon further examination of PPL's filing and during the course of the proceeding.

10. PPLICA respectfully requests that the Commission provide the following relief:
 - (a) Suspend the effectiveness of proposed Supplement No. 38 through January 1, 2005;
 - (b) Investigate the rates, terms, and provisions contained in PPL's Supplement No. 38 to Tariff Electric-Pa. P.U.C. No. 201 in full evidentiary hearings;
 - (c) Consolidate PPLICA's Complaint with its investigation into PPL's Supplement No. 38;
 - (d) Allow PPLICA to participate fully in the evidentiary proceeding, cross-examine all PPL witnesses, present its own evidence and witnesses, and offer arguments on its own behalf; and
 - (e) Require PPL to adduce substantial evidence to justify and substantiate its proposed rate increase and tariff revisions.

WHEREFORE, the PP&L Industrial Customer Alliance respectfully requests that PPL Electric Utilities Corporation be required to answer this Complaint and that, upon a final hearing, the Commission make such order as it deems necessary and appropriate.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

David M. Kleppinger
Pamela C. Polacek
Karen S. Miller
100 Pine Street
P. O. Box 1166
Harrisburg, PA 17108-1166
Phone: (717) 232-8000
Fax: (717) 237-5300

Counsel to the PP&L Industrial Customer Alliance

Dated: April 6, 2004

**TENTATIVE MEMBERSHIP OF
PP&L INDUSTRIAL CUSTOMER ALLIANCE**

Agere Systems, Inc.
Air Products and Chemicals, Inc.
Alcoa, Inc.
Binkley & Ober, Inc.
BOC Gases
Buckeye Pipe Line Company, L.P.
Certainteed Corporation
Chamberlain Manufacturing Corp.
Cinram Manufacturing, Inc.
Hercules Cement Company LP, dba Buzzi-Unicem USA
Hershey Foods Corporation
Lafarge North America Corporation
Magee Rieter Automotive Systems
Mount Joy Wire Corporation
Praxair, Inc.
RR Donnelley & Sons Company
Stroehmann Bakeries
Timet North America
Wegmans Food Markets, Inc.

APPENDIX "A"

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).

FIRST CLASS MAIL

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

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

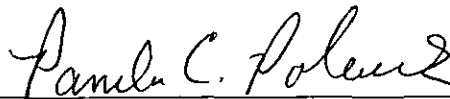
William R. Lloyd, Jr., Esquire
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Irwin Popowsky, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

David A. McCormick, Esquire
The Department of Defense and Federal
Executive Agencies
Regulatory Law Office
U.S. Army Legal Services Agency
Department of the Army (DAJA-RL 4120)
901 North Stuart Street, Room 713
Arlington, VA 22203-1837

Office of Trial Staff
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Eric Epstein
4100 Hillside Drive
Harrisburg, PA 17112



Pamela C. Polacek

Counsel to the PP&L Industrial
Customer Alliance

Dated this 6th day of April, 2004, at Harrisburg, Pennsylvania.

RECEIVED
2004 APR -6 PM 3:56
SECRETARY'S BUREAU

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

APRIL 14, 2004

PAUL E RUSSELL, ASSOCIATE GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

DOCUMENT
FOLDER

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0002

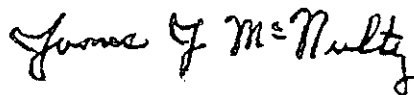
Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by PP&L INDUSTRIAL CUSTOMER ALLIANCE.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

db

DOCKETED
APR 19 2004



ORIGINAL

OFFICE OF SMALL BUSINESS ADVOCATE

Suite 1102, Commerce Building
300 North Second Street
Harrisburg, Pennsylvania 17101

William R. Lloyd, Jr.
Small Business Advocate

(717) 783-2525
(717) 783-2831 (FAX)

April 8, 2004

HAND DELIVERED

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P. O. Box 3265
Harrisburg, PA 17105-3265

DOCUMENT
FOLDER

Re: Pennsylvania Public Utility Commission v.
PPL Electric Utilities Corporation
Docket No. R-00049255 C0003

Dear Secretary McNulty:

I am delivering for filing today the original plus three copies of the Complaint and Public Statement on behalf of the Office of Small Business Advocate in the above captioned matter.

A copy has been served today on all known parties in this proceeding. A Certificate of Service to that effect is enclosed.

Sincerely,

Steven C. Gray
Assistant Small Business Advocate

Enclosures

cc: Hon. Allison K. Turner
Administrative Law Judge

Parties of Record

Robert D. Knecht

SECRETARY'S BUREAU

2004 APR -8 PM 3:40

RECEIVED

113

ORIGINAL



OFFICE OF SMALL BUSINESS ADVOCATE

Suite 1102, Commerce Building
300 North Second Street
Harrisburg, Pennsylvania 17101

William R. Lloyd, Jr.
Small Business Advocate

April 8, 2004

(717) 783-2525
(717) 783-2831 (FAX)

ALL PARTIES OF RECORD AT DOCKET NO. R-00049255 C 0003

Re: Pennsylvania Public Utility Commission v.
PPL Electric Utilities Corporation
Docket No. R-00049255 C 0003

DOCUMENT
FOLDER

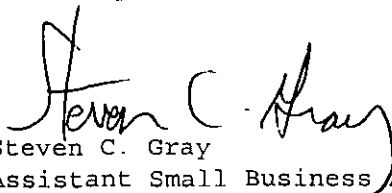
The Office of Small Business Advocate has retained the services of Robert D. Knecht as its expert witness in this case. In order to provide our consultant all materials, including discovery, testimony, briefs, etc., in a timely fashion, we request that you add the name of Mr. Knecht to your service lists so that he receives copies of documents when they are served in this case. Those items should be addressed to:

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 - Fax
E-mail: rdk@indecon.com

DOCKETED
APR 19 2004

If you have any questions or concerns, please do not hesitate to contact me. Thank you in advance for your cooperation.

Sincerely,


Steven C. Gray
Assistant Small Business Advocate

cc: Mr. Robert D. Knecht

SECRETARY'S BUREAU

2004 APR -8 PM 3:40

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION :
v. : Docket No. R-00049255
PPL ELECTRIC UTILITIES CORPORATION :

COMPLAINT OF
SMALL BUSINESS ADVOCATE

1. The Complainant is:

William R. Lloyd, Jr.
Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
(717) 783-2525
2. The name and address of the Complainant's
attorney is:

Steven C. Gray
Assistant Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831
3. The respondent utility is:

PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101-1179
4. The Complainant is authorized and directed by the Small
Business Advocate Act, Act 181 of 1988, 73 P.S. §§399.41 - 399.50, to represent
the interests of small business consumers of utility services in matters before
the Pennsylvania Public Utility Commission ("Commission").

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5. This complaint is filed against the rates, terms and other provisions of Supplement No. 38 to Tariff-Electric Pa. P.U.C. No. 201 ("Supplement No. 38") filed on March 29, 2004, by PPL Electric Utilities Corporation ("PPL" or "Company"). The proposed tariff supplement, if approved by the Commission, would increase the rates presently paid by PPL's customers by \$221 million, which represents an overall increase to revenues of approximately 8.1%.

6. PPL is requesting a rate of return on common equity of 11.5%.

7. Under proposed Supplement No. 38, PPL's revenues collected from the small commercial class would increase by approximately 9.5%. The commercial class rate of return would be about twice the system average rate of return.

8. Upon preliminary review of the materials filed by PPL in support of its proposed Supplement No. 38, Complainant believes and therefore avers that those materials may be insufficient to justify the rate increase requested, and that PPL's present and proposed rates and conditions of service may be unjust, unreasonable and contrary to law.

9. Complainant believes, and therefore avers, that PPL's requested return on common equity will provide an excessive return on the Company's investments; that the Company's proposed class rates of return will provide an excessive return from the Company's small business customers; and that these requested returns are unjust, unreasonable and contrary to law.

10. Complainant believes, and therefore avers, that PPL's present and proposed rates, rate design and cost and revenue allocation are or may be unjust, unreasonable and unlawfully discriminatory in violation of, inter alia, sections 1301 and 1304 of the Public Utility Code, 66 P.S. §§1301 and 1304, and

contrary to appropriate public policy and sound ratemaking considerations, and may not be supported by the materials filed by PPL.

11. Complainant believes, and therefore avers, that the Distribution System Improvement Charge proposed by PPL is contrary to law and contrary to appropriate public policy and sound ratemaking considerations.

12. Upon preliminary review, Complainant believes, and therefore avers, that PPL has not submitted sufficient evidence to prove that the Company is in compliance with the reliability requirements prescribed by the Public Utility Code and by the Commission's regulations.

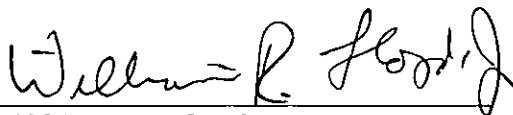
13. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

A. Suspend and investigate the operation of Proposed Supplement No. 38;

B. At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Supplement No. 38 to the extent required to insure that PPL's rates are lawful, just, reasonable and not unduly discriminatory to any class of customers, including small business consumers of PPL's utility services; and

C. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,



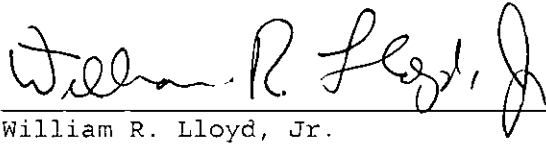
William R. Lloyd, Jr.
Small Business Advocate

Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

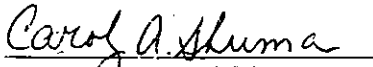
Dated: April 8, 2004

AFFIDAVIT

William R. Lloyd, Jr., being duly sworn according to law, says that the facts set forth above are true and correct to the best of his knowledge, information and belief and he expects to be able to prove them at the hearings in this proceeding.


William R. Lloyd, Jr.

Sworn to and subscribed
before me this 8th day
of April, 2004.


Notary Public

My Commission Expires:

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
CAROLYN A. SHUMAN, Notary Public
City of Harrisburg, Dauphin County
My Commission Expires Jan. 22, 2005

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APR 19 2004

PUBLIC STATEMENT OF
SMALL BUSINESS ADVOCATE
CONCERNING THE INTEREST
OF SMALL BUSINESS CONSUMERS
TO BE PROTECTED BY THE FILING OF A COMPLAINT
AGAINST PROPOSED SUPPLEMENT NO. 38 TO TARIFF NO. 201
OF PPL ELECTRIC UTILITIES CORPORATION

DOCUMENT
FOLDER

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§399.41 - 399.50 ("Act"). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a complaint against proposed Supplement No. 38 to Tariff No. 201 of PPL Electric Utilities Corporation ("PPL" or "Company").

PPL's proposed tariff supplement would increase by approximately \$221 million the level of rate revenues currently being collected from all customers, including its small business customers. The requested rate increase, if approved in full by the Commission, would provide an excessive 11.5% return on common equity. Furthermore, under PPL's proposal, the rate of return paid by small business customers would be almost twice the system average rate of return.

The Small Business Advocate filed a formal complaint against PPL's proposed rate increase in order to protect the interests of the utility's small business customers. A preliminary review of the data filed by PPL in support of its request for a rate increase indicates that the costs claimed by the utility for ratemaking purposes may be excessive and that the proposed Distribution System Improvement Charge is contrary to law. A thorough inquiry by the Public Utility

Commission into all of the elements of PPL's request for such a rate increase is necessary to ensure that the utility's rates, including any new rates that may be set in this proceeding, are just and reasonable.

PPL is the first major electric distribution company to seek an increase in base rates following expiration of the transmission and distribution rate caps. Therefore, it is imperative that the Commission review PPL's reliability. However, a preliminary review indicates that the data filed by PPL is inadequate to prove that the Company meets the reliability requirements of the Public Utility Code and the Commission's regulations.

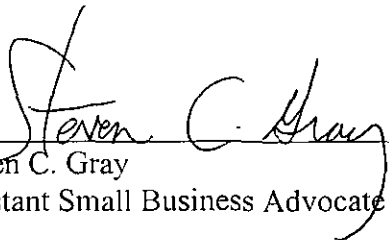
In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the proposed rates in PPL's proposed Supplement No. 38. The Small Business Advocate will ask the Commission to deny any proposed rate increase or other changes in PPL's present tariffs that apply to small business customers that are not proven by PPL to be lawful, just, reasonable and non-discriminatory to all of its customer classes.

Dated: April 8, 2004

Scott J. Rubin, Esquire
3 Lost Creek Drive
Selinsgrove, PA 17870-9357
(570) 743-2233
(570) 743-8145 (fax)
scott@publicutilityhome.com

Mr. Eric Epstein
4100 Hillsdale Road
Harrisburg, PA 17112
(717) 541-1101
(717) 541-5487 (fax)
ee Epstein@igc.apc.org

Stephen J. Baron
J. Kennedy and Associates, Inc.
570 Colonial Park Drive
Suite 305
Roswell, GA 30075



Steven C. Gray
Assistant Small Business Advocate

Date: April 8, 2004

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SECRETARY'S BUREAU

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

APRIL 14, 2004

PAUL E RUSSELL, ASSOCIATE GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

DOCUMENT
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RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0003

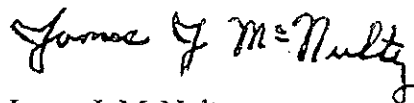
Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by OFFICE OF SMALL BUSINESS ADVOCATE, PA PUC.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

db

DOCKETED
APR 19 2004



ORIGINAL

OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560 (in PA only)

IRWINA. POPOWSKY
Consumer Advocate

FAX (717) 783-7152
consumer@paoca.org

April 12, 2004

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
P.O. Box 3265
Harrisburg, PA 17120

DOCUMENT
FOLDER

SECRETARY'S BUREAU

2004 APR 12 PM 4:40

RECEIVED

Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. R-00049255 00004

Dear Secretary McNulty:

On behalf of the Office of Consumer Advocate, enclosed for filing please find an original and three (3) copies of the Formal Complaint in the above-referenced proceeding.

Sincerely yours,

James A. Mullins
Assistant Consumer Advocate

Enclosures

cc: Parties of Record
Office of Special Assistants

78765

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FORMAL COMPLAINT
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

For Commission Use Only:

COMPLAINT DOCKET NO. R-00049255 REF. # C0004 UTILITY CODE 110500

OCA vs. PPL

PLEASE PRINT:

DOCUMENT
FOLDER

1. YOUR NAME, ADDRESS AND TELEPHONE NUMBER.

Name Irwin A. Popowsky, Consumer Advocate
Street 555 Walnut Street 5th Floor, Forum Place
City Harrisburg State Pennsylvania Zip 17101-1923
County Dauphin Work Telephone-Area Code (717) 783-5048

2. COMPANY YOU ARE COMPLAINING ABOUT.

Name PPL Electric Utilities Corporation

3. WHAT IS YOUR COMPLAINT? (DESCRIBE PROBLEM).

A. On March 29, 2004, PPL Electric Utilities Corporation (PPL or the Company) filed Supplement No. 38 to Tariff Electric-Pa. P.U.C. No. 201. In Supplement No. 38, the Company proposes to increase rates to produce additional annual operating revenues of \$221,771,000, or 8.14%, over present rates. This rate increase includes a \$164.4 million increase in retail distribution operating revenues and a \$57.2 million increase in transmission service revenues. The proposed rate increase would be effective on January 1, 2005.

DOCKETED
APR 19 2004

For Commission Use Only:

DATE FILED / / MONITOR BUREAU

B. The Company is engaged in the business of furnishing electric service to approximately 1.3 million residential, commercial and industrial customers in over 23 counties throughout Pennsylvania.

C. For the residential class, the Company is proposing an overall increase of 9.67%. A typical residential customer using 900 Kwh per month will see an average overall bill increase of \$7.58 per month. As part of its filing, PPL is proposing an increase to the monthly customer charges for Residential Service. If the rates were to be approved as proposed by the Company, the monthly Customer Charge for Residential Service would increase from \$6.55 to \$12.20, but that charge would also cover the first 200 Kwh of usage each month.

D. The Company's proposed rate increase, if approved, will produce an 8.80% overall rate of return on its original cost rate base for distribution service, including a 11.5% rate of return on common equity.

E. The Company is also proposing to implement a Transmission Service Charge (TSC) that would allow the Company to pass through transmission service charges that the Company must pay to PJM.¹ The Company is proposing a mechanism to reconcile these charges annually.

F. PPL further proposes a Distribution System Improvement Charge (DSIC) that would allow the Company to recover costs associated with distribution system upgrades between base rate proceedings from ratepayers through a surcharge mechanism.

G. The Consumer Advocate is empowered to represent the interests of consumers before the Pennsylvania Public Utility Commission, pursuant to Act 161 of the General Assembly,

¹PJM is a regional transmission organization, which coordinates the movement of electricity through all or parts of Delaware, Maryland, New Jersey, Ohio, Pennsylvania, Virginia, West Virginia and the District of Columbia.

as amended, 71 P.S. §§ 309-1, *et seq.*

H. A preliminary examination of the Company's filed Tariff Supplement indicates that the proposed changes and increase in rates, proposed rate schedule modifications and transfers, and proposed changes in rate policy, rules and regulations contained in the proposed Tariff may be unjust, unreasonable, in violation of the law and will or may produce an excessive return on investment in violation of the Public Utility Code, 66 Pa. C.S. § 1301, *et seq.*

I. The Consumer Advocate also avers that the proposed tariff changes and proposed rate design may be unlawfully discriminatory, in violation of the Public Utility Code, 66 Pa. C.S. §§ 1301 and 1304, *et seq.*, and may otherwise be contrary to sound ratemaking principles and public policy.

J. PPL's proposed DSIC may be unlawful, unjust, unreasonable and contrary to sound rulemaking and public policy.

K. The TSC proposed by PPL is also in need of careful examination. Such a proposal--which automatically passes through rates and charges to customers--must be examined to ensure that the mechanism is fair, equitable and does not harm consumers.

L. The Consumer Advocate will also examine the universal service programs of PPL to ensure that they are appropriate, adequately funded and in compliance with statutory and regulatory requirements.

M. A preliminary examination and review by the OCA of the Company's existing rates, rules and regulations indicates that certain rates, rules and regulations may not be just and reasonable or otherwise proper under the Public Utility Code and applicable ratemaking principles. 66 Pa. C.S. § 1301 *et seq.*

N. The Consumer Advocate files this Complaint to ensure that the Commission

will fully and fairly adjudicate issues pertaining to whether the Company's existing and proposed rates--and any and all rate policy changes--are just and reasonable, and are not unduly discriminatory or otherwise unlawful.

4. WHAT DO YOU WANT US TO DO?

The Consumer Advocate respectfully requests that the Public Utility Commission:

- A. Suspend and investigate the operation of Supplement No. 25, pursuant to Section 1308(d) of the Public Utility Code, 66 Pa. C.S. § 1308(d);
- B. Consolidate all complaints filed against proposed Supplement No. 25;
- C. Hold full evidentiary hearings examining the reasonableness of the Company's current rates and its proposed increases in rates;
- D. After providing the public with adequate notice, hold public input hearings in the Company's service territory in order to provide its customers with an opportunity to be heard on the record, and hold those hearings as early in the case as feasible;
- E. Deny any increase or change in the Company's rates that is unjust, unreasonable or inconsistent with the Public Utility Code, sound ratemaking principles, and public policy;
- F. Determine the justness and reasonableness of the Company's current and proposed rates; and
- G. Grant such other relief it deems appropriate.

YOU MUST SIGN AND DATE YOUR COMPLAINT.

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


Signature of complainant

4/12/04
April 12, 2004

YOU DO NOT NEED A LAWYER If you DO have a lawyer PLEASE PRINT the lawyer's name, address and telephone number below.

Lawyer's Name Tanya J. McCloskey, Senior Assistant Consumer Advocate and James A. Mullins, Lori A. Herman, and Aron Beatty Assistant Consumer Advocates

Street 555 Walnut St, 5th Floor (Forum Place)

City Harrisburg State PA Zip 17101-1923

Telephone Number-Area Code (717) 783-5048

DOCUMENT
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PUBLIC STATEMENT OF THE CONSUMER ADVOCATE ISSUED IN
ACCORDANCE WITH SECTION 904-(e) OF ACT OF APRIL 9, 1929
(P.L. 177, No. 175), KNOWN AS "THE ADMINISTRATIVE CODE OF
1929", AS AMENDED BY ACT 161 OF 1976 (APPROVED JULY 9, 1976)

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Act 161 of the Pennsylvania General Assembly, 71 P.S. § 309-2, as enacted July 9,

1976, authorizes the Consumer Advocate to represent the interest of consumers before the Pennsylvania Public Utility Commission ("Commission"). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file a Formal Complaint and participate in proceedings before the Commission involving the proposed rate increase requested by PPL Electric Utilities Corporation ("PPL" or "the Company") docketed at R-00049255.

The Company is engaged in the business of furnishing electric service to approximately 1.3 million residential, commercial, and industrial customers in 23 counties in Northeast and Central Pennsylvania. The proposed tariff, if approved, would allow the Company an overall rates increase of \$221,771,000 or an increase of 8.14%. The Company would also be allowed an overall rate of return of 8.80% on its original cost rate base and a 11.50% return on common equity. For the residential class, the Company is proposing an overall rate increase of 9.67%. A residential customer using 900 Kwh per month will see their monthly bill for electricity usage increase by approximately \$7.58. The Company is also proposing an increase to the monthly customer charge for Residential Service. If the rates were to be approved as proposed by the Company, the monthly Customer Charge for Residential Service would increase from \$6.55 to \$12.20. However, the \$12.20 would include the first 200 Kwh of usage.

The Company is proposing to implement a Transmission Service Charge to be reconciled annually that would allow the Company to pass through transmission service charges the Company owes to PJM. The Company is further proposing a Distribution System Improvement

Charge to recover costs associated with distribution upgrades between rate cases.

The Consumer Advocate files this Complaint to determine whether the rate increase and other charges and mechanisms sought by Company are just and reasonable based upon information filed by the Company in support of its claim. The Consumer Advocate will represent the interests of PPL consumers before the Commission and seek to ensure that customers are not charged rates that are unjust, unreasonable or otherwise contrary to law.

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the foregoing document, Office of Consumer Advocate's Formal Complaint, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 12th day of April, 2004.

SERVICE BY HAND DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
P.O. Box 3265
Harrisburg, PA 17120

Richard A. Kanaskie, Esq.
PA Public Utility Commission
Office of Trial Staff
P.O. Box 3265
Harrisburg, PA 17105-3265
For: Trial Staff

SECRETARY'S BUREAU

2004 APR 12 PM 4:40

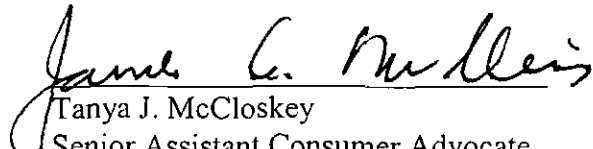
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SERVICE BY FIRST CLASS MAIL

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

David M. Kleppinger, Esq.
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

William R. Lloyd, Jr. Esq.
Office of Small Business Advocate
Commerce Building - Suite 1102
300 North 2nd Street
Harrisburg, PA 17101


Tanya J. McCloskey
Senior Assistant Consumer Advocate
James Mullins
Lori Herman
Aron Beatty
Assistant Consumer Advocates

Counsel For:
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923
(717) 783-5048

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

APRIL 14, 2004

PAUL E RUSSELL, ASSOCIATE GENERAL COUNSEL
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

DOCUMENT
FOLDER

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0004

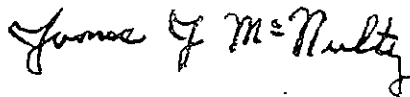
Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by OFFICE OF CONSUMER ADVOCATE, PA PUC.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbS

DOCKETED
APR 19 2004

ORIGINAL

~~C-20043011~~

110550

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

RECEIVED

2004 MAY 20 AM 9:41

SECRETARY'S BUREAU

Please Print:

R-00049255 C0005

1. Your Name, Mailing Address and Telephone Number.

Name Anthony J. Graziano

Street/P.O. Box 640 Westwood Lane Apt.#

City Frackville State PA Zip 17931

County Schuylkill Home Telephone-Area Code (570) 874-1929

Work Telephone-Area Code (570) 874-1929

DOCUMENT

2. Name of Company your complaint concerns: PPL Electric Utilities Corporation

3. What is your complaint?

Due to our present economic conditions, the percentage of the rate increase
would appear to be excessive, therefore, I am not in favor of the rate
increase requested by PPL.

DOCKETED

JUL 02 2004

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

(-over-)

24

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

Deny rate increase requested by PPL.

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

5. You must sign and date your complaint below.

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

Anthony J. Szymanski
Original/Signature of complaining person

May 19, 2004
Date

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

DOCUMENT

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

JUNE 30, 2004

PAUL E RUSSELL
ASSOCIATE GENERAL COUNSEL, PPL
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

DOCKETED
JUL 02 2004

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0005

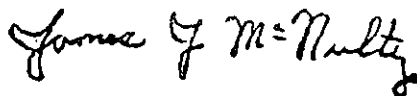
Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by ANTHONY J GRAZIANO.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dlbs

ORIGINAL

110500

Formal Complaint Form
Pennsylvania Public Utility Commission

Please Print: (you may also type your answers directly onto the form as it appears on your screen)

SECRETARY'S BUREAU
MAY 17 AM 9:56

1. Your name, mailing address and telephone number:

Name BRENDA HOOVER
Street/P.O.Box 630 N. JEFFERSON ST. Apt #
City ALLENTOWN State PA. Zip 18102
County LEHIGH Area Code/Home Phone 610-821-8290
Area Code/Work Phone 610-261-7017

2. Name of company your complaint concerns: PPL ELECTRIC UTILITIES

3. What is your complaint? (Use additional paper if need more space).

I FEEL PPL SHOULD BE DENIED THE INCREASE THEY REQUESTED - OUR ELECTRIC BILLS ARE ALREADY HIGH AND PPL REPORTED A RECORD PROFIT LAST YEAR. THIS INCREASE IS EXCESSIVE AND WE MUST PUT A STOP TO THE UTILITIES PRICING US OUT OF OUR HOMES.

4. What do you want the Public Utility Commission to do about your complaint? (Use additional paper if need more space).

PLEASE DENY THE INCREASE PPL HAS REQUESTED

DOCUMENT

5. You must sign and date your complaint below.

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

Brenda Hoover
Signature

5/11/04
Date

Continued on next page

DOCKETED

JUL 02 2004

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

DOCUMENT

JUNE 30, 2004

PAUL E RUSSELL
ASSOCIATE GENERAL COUNSEL, PPL
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

DOCKETED
JUL 02 2004

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0006

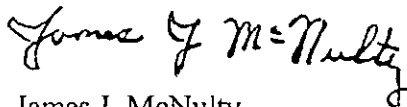
Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by BRENDA HOOVER.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbs

ORIGINAL

**BEFORE THE
Pennsylvania Public Utility Commission**

Eric Joseph Epstein :
v. : **Docket No. R-000492⁵C 0007**
PPL Electric Utilities :
Corporation :

Complaint of Eric Joseph Epstein, Pro se

1) The name and address of the Complaint are:

DOCUMENT

Eric Joseph Epstein, *Pro se*
4100 Hillsdale Road
Harrisburg, PA 17112
(717)-541-1101 Phone
ericepstein@comcast.net

RECEIVED
2004 APR 14 AM 9:51
SECRETARY'S BUREAU

2) the name and address of the Respondent is:

PPL Electric Utility Corporation
Two North 9th Street
Allentown, PA 18101-1179

DOCKETED
JUL 02 2004

3) Eric Joseph Epstein ("Epstein" or "Mr. Epstein" or "the Complainant")
is:

- a) A PPL shareholder;
- b) Mr. Epstein receives generation, distribution and transmission service from the Company;
- c) Epstein is a Signatory to the JOINT PETITION FOR FULL SETTLEMENT OF PP&L INC's RESTRUCTURING PLAN AND RELATED COURT PROCEEDINGS (August 12, 1998) (Docket No. R-00973954);
- d) Mr. Epstein was also a sponsor of the Nuclear Decommissioning provision contained in the Negotiated Settlement (D. 1 . **Nuclear Decommissioning**, Page. 21, Lines, 1-8);

- e) Eric Joseph Epstein was actively involved in the Petition of PP&L, Inc., For Permission To Defer, For Future Recovery, A Portion of Its Transition Charges, or In The Alternative, To Exceed the Rate Caps Pursuant to 66 Pa. C.S. § 2804(4)iii(G); Docket No: P-00991780;
- f) Mr. Epstein was an Active Party in the Petition of PPL, Inc. Petition asking for Issuance of Determination Under Section 329(c) of PUCHA, 15 USC Section 79z-5a9(c); Docket No. P-00991787;
- g) In addition, Epstein was also an Active party in PPL Electric Utilities Corporation 2002 Reconciliation Filing with the Pennsylvania Public Utility Commission;
- h) Epstein filed an unofficial Data Request with PPL related to PPL's CTC's 2003 Reconciliation Filing and Intervened in the Case;
- i) Eric Joseph Epstein participated in PPL Electric Utilities Corporation 2001 and 2002 Intangible Transition Charge Reconciliation Filings; and,
- j) Eric Joseph Epstein was actively involved in the Petition of PP&L, Inc., For Permission To Defer, For Future Recovery, A Portion of Its Transition Charges, or In The Alternative, To Exceed the Rate Caps Pursuant to 66 Pa. C.S. § 2804(4)iii(G); Docket No: P-00991780.
- k) Mr. Epstein submitted Informal Data Requests in PPL's 2003 ITC Reconciliation Filing, and the Petition of PPL Electric Utilities Corporation for Authority to Defer for Accounting and Financial Purposes Certain Losses from Extraordinary Storm Damage and to Amortize Such Losses;
- 4) PPL filed with the PUC Supplement No. 38 to Tariff on March 29, 2004;
- 5) PPL's Tariff is a rate increase request of \$164.4 million, and is a 31% increase over the Company's current distribution revenues;

BEFORE THE
Pennsylvania Public Utility Commission

Eric Joseph Epstein :
v. : **Docket No. R-000492⁵C0007**
PPL Electric Utilities :
Corporation :

April 14, 2004

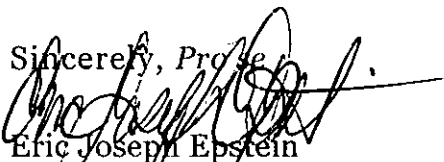
James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RECEIVED
2004 APR 14 AM 9:51
SECRETARY'S BUREAU

Dear Secretary McNulty:

Enclosed for filing with the Commission are the original and three (3) copies of Eric Joseph Epstein's ("Epstein" or Mr. Epstein") Complaint in the above-referenced proceeding.

Pursuant to Section 701 of the Pennsylvania Public Utility ("PUC" or Commission") Code 66 Pa. C.S.A. § 701; Sections 5.21 & 5.22, Eric Joseph Epstein, *Pro se* hereby files a Formal Complaint against **PPL Electric Utilities Corporation's** ("PPL" or the "Company") proposed **Supplement No. 38 to Tariff Electric PA Public Utility Commission No. 201**. PPL's Tariff is a rate increase request for the the Company's Distribution Base Rates under Section 1308 of the Code 66 Pa. C.S.A. § 1308 as well as relevant provisions of the Electric Generation Customer and Choice and Competition Act ("Competition Act") 66 Pa. C.S.A. § § *et seq.*

Sincerely, *Pro se*

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

cc: Honorable Allyson K. Turner, Administrative Law Judge
Certificate of Service

6) The Present Request would allow for a return on equity of 11.5%, and become effective on June 1, 2004;

7) PPL's proposed filing would increase transmission rates by \$57.2 million, and allow for a customer "pass through" charge to be assessed via a Transmission Service Charge ("TSC") commencing on January 1, 2005;

8) The combination of the rate requests would increase customers bills, on average, 8.1%;

9) PPL claims the increases are necessary to upgrade and improve infrastructure, connect new customers, and defer business costs;

10) The Company's filed supporting Testimony and documentation to support their rate requests, i.e., PPL's Supplement No. 38, are insufficient to establish that the proposed rates are just, reasonable and nondiscriminatory, as required by Sections 1301 & 1304 of the Code, 66 Pa. C.S.A. § § 1301 & 1304;

11) The Respondent has the full burden of proof [Section 315 (a) of the Public Utility Code Code, 66 Pa. C.S.A. § 315 (a)] to establish and prove that the proposed rate increases are just and reasonable and consistent with Section 1301 of the Code, 66 Pa. C.S.A. § 1301;

12) Eric Joseph Epstein's Complaint is universal and inclusive, and directed against the rates, terms, and provisions contained in PPL's Supplement No. 38;

13) Mr. Epstein respectfully requests that the Pennsylvania Public Utility Commission provide the following relief:

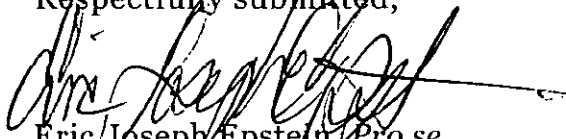
a) Conduct an investigation into the rates, terms, and provisions contained in PPL's Supplement No. 38 to Tariff Electric - Pa. PUC No. 201 in full evidentiary hearings;

b) Suspend the effectiveness date of PPL's proposed Supplement No. 38;

c) Integrate Eric Joseph Epstein's Complaint with the Commission's investigation into PPL's Supplement No. 38; and,

d) Allow Mr. Epstein to fully participate in the evidentiary proceeding, cross examine PPL witnesses as well as witnesses presented by Active Parties; present his own evidence; prepare direct, rebuttal and sur-rebuttal testimony; and, offer arguments on his own behalf;

Respectfully submitted,



Eric Joseph Epstein, *Pro se*
4100 Hillsdale Road
Harrisburg, PA 17112
(717)-541-1101 Phone
(717)-541-5487 Fax
ericepstein@comcast.net

Dated: April 14, 2004

Notary:

State of Pennsylvania
County of Dauphin
Sworn and subscribed before me this
13th day of April, 2004
Megan T. McClain

NOTARIAL SEAL
Megan T. McClain, Notary Public
City of Harrisburg, Dauphin County
My commission expires November 18, 2006

CERTIFICATION OF SERVICE
Pennsylvania Public Utility Commission

The Honorable Allison K. Turner
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Harrisburg, PA 17120

Paul E. Russell, Esquire
Associate General Counsel
PPL Electric Utilities Corp.
Two North 9th Street
Allentown, PA 18101-1179

Irwin Popowsky, Esquire
Consumer Advocate
Tanya J. McCloskey, Esquire
Senior Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
Fifth Floor, Forum Place
Harrisburg, PA 17120

David A. McCormick, Esquire
DOD - Regulatory Law Office
U.S. Army Legal Services
Dept. of the Army
(DAJA-RL 4120)
901 N. Stuart Street, Rm. 713
Arlington, VA 22203-1837

Charles F. Hoffman, Esquire
Senior Prosecutor
Office of Trial Staff
Pennsylvania PUC
Commonwealth Keystone Building
400 North Street, 3rd Floor West
Harrisburg, PA 17120

William R. Lloyd, Esquire
Small Business Advocate
Steven C. Gray, Esquire
Assistant Small Business Advocate

Scott J. Rubin, Esquire
IBEW, Local 1600
3 Lost Creek Drive
Selingsrove, PA 17870

Office of Small Business Advocate
Suite 1102, Commerce Bldg.
300 North Second Street
Harrisburg, PA 17101

David M. Kleppinger, Esquire
Pamela C. Polacek, Esquire
Karen S. Miller, Esquire
McNees, Wallace & Nurick
100 Pine Street, PO Box 1166
Harrisburg, PA 17108-1166

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

DATE: April 14, 2004

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

JULY 2, 2004

PAUL E RUSSELL, ASSOCIATE GENERAL COUNSEL, PPL
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

DOCKETED

JUL 02 2004

DOCUMENT

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0007

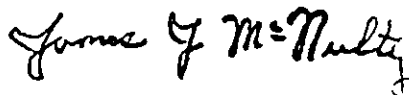
Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by ERIC JOSEPH EPSTEIN.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbb

ORIGINAL

**FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission**

R - 00049255C0008

RECEIVED
PA PUC
OFFICE-LEGIS. AFFAIRS
2004 MAY 18 AM 8:01

Please Print:

1. Your Name, Mailing Address and Telephone Number.

Name Victoria K. Mackin "etal" (CONCERNED CITIZENS of Sch Co.)

Street/P.O. Box One Green Acres Apt.#

City McAdoo State Pa Zip 18237

County Schuylkill Home Telephone-Area Code (570) 929 3050
Work Telephone-Area Code ()

2. Name of Company your complaint concerns: P.P.L.

3. What is your complaint?

The amount the P.P.L. is asking to increase
our monthly bills, is outrageous.

DOCKETED
JUL 16 2004

RECEIVED
2004 MAY 18 AM 8:05
SECRETARY'S BUREAU

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

(-over-)

**DOCUMENT
FOLDER**

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

We want PUC to consider The monthly increase
people on S.S. received IN JAN 2004 AS compared
to increase PPL wants.

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

5. You must sign and date your complaint below.

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

Victoria K. Mackey
Original Signature of complaining person

3/11/04
Date

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code () _____

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

July 15, 2004

PAUL E RUSSELL ASSOCIATE GENERAL COUNSEL
PPL ELECTRIC UTILITIES CORPORATION
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0008

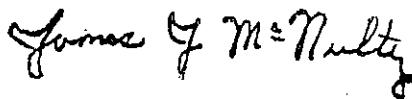
Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by VICTORIA K MACKIN.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

db's

DOCKETED
JUL 16 2004

**DOCUMENT
FOLDER**

ORIGINAL

R - 00049255 C 0009

RECEIVED

Formal Complaint Form Pennsylvania Public Utility Commission

2004 APR 22 PM 9:12

Please Print: (you may also type your answers directly onto the form as they appear on your screen)

1. Your name, mailing address and telephone number:

Name Cheryl & Jeremy Ebert

Street/P.O.Box 2820 Mosser Street Apt # _____

City Allentown State PA Zip 18103

County Lehigh Area Code/Home Phone 610-433-9267
Area Code/Work Phone _____

2. Name of company your complaint concerns: PPL Electric Utilities

3. What is your complaint? (Use additional paper if need more space).

I am objection to PPL raising the cost of electric service rates by 9.8%. I currently pay around \$100/month for electric service for a 1300 square foot ranch home, and i consider myself an average user of electric service. Increasing my electric bill \$120 a year would cause undo hardship on my family. My family income level is in the upper low class. This could cause extreme stress on an already tight budget.

4. What do you want the Public Utility Commission to do about your complaint? (Use additional paper if need more space).

I feel the PUC needs to look at what these funds are for, and what the average salaries are for PPL executives are. Maybe instead of PPL employees having mid-to-high class salary ranges they should think about freezing their pay increases, like my employer has. Raising their profit margins will not help the low-mid income families of PA.

5. You must sign and date your complaint below.

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

Jeremy Ebert
Signature

4/16/04
Date

Continued on next page

DOCUMENT
FOLDER

DOCKETED
JUL 16 2004

2

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

Lawyer's Name No legal representation, only a concerned citizen.

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

Mail to:

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

For more information, please contact the Secretary's Bureau at 717-772-7777.

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

July 15, 2004

PAUL E RUSSELL ASSOCIATE GENERAL COUNSEL
PPL ELECTRIC UTILITIES CORPORATION
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0009

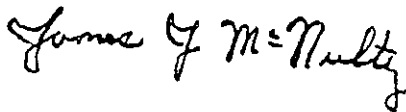
Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by CHERYL AND JEREMY EBERT.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbS

DOCKETED
JUL 16 2004

DOCUMENT
FOLDER

ORIGINAL

R-00049255C0010

**Formal Complaint Form
Pennsylvania Public Utility Commission**

RECEIVED
2004 JUN -3 AM 9:40
SECRETARY'S BUREAU

Please Print: (you may also type your answers directly onto the form as it appears on your screen)

1. Your name, mailing address and telephone number:

Name MARTHA WELLS

Street/P.O.Box PO BOX 312 Apt # _____

City WICONISCO State PA Zip 17097

County DAUPHIN Area Code/Home Phone 717-453-9576
Area Code/Work Phone _____

2. Name of company your complaint concerns: PPL ELECTRIC

3. What is your complaint? (Use additional paper if need more space).

PROPOSED RATE CHANGE

**DOCUMENT
FOLDER**

4. What do you want the Public Utility Commission to do about your complaint?
(Use additional paper if need more space).

REJECT PROPOSED CHANGE

In citizen living on fixed incomes.
Certainly can't afford the rate the request.

5. You must sign and date your complaint below.

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

Martha Wells
Signature

5-30-04
Date

Continued on next page

DOCKETED
JUL 16 2004

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

Lawyer's Name _____

Street _____ *W/A*

City _____ State _____ Zip _____

Area Code/Phone Number _____

Mail to:
Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

For more information, please contact the Secretary's Bureau at 717-772-7777.

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

July 15, 2004

PAUL E RUSSELL ASSOCIATE GENERAL COUNSEL
PPL ELECTRIC UTILITIES CORPORATION
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0010

Dear Sir/Madam:

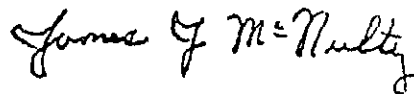
A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by MARTHA WELLS.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

**DOCUMENT
FOLDER**

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbs

DOCKETED
JUL 16 2004

**Formal Complaint Form
Pennsylvania Public Utility Commission**

Please Print: (you may also type your answers directly onto the form as it appears on your screen)

1. Your name, mailing address and telephone number:

Name Margaret M. Stuski, Esquire

Street/P.O.Box 908 Walnut Street Apt # _____

City Wormleysburg State PA Zip 17043

County Cumberland Area Code/Home Phone 717-730-0568

Area Code/Work Phone 610-517-2069

2. Name of company your complaint concerns: PP&L/H.T. Lyons

3. What is your complaint? (Use additional paper if need more space).

See attached.

**DOCUMENT
FOLDER**

4. What do you want the Public Utility Commission to do about your complaint?
(Use additional paper if need more space).

Investigage PP&L's for-profit subsidiaries; &
Order that PP&L divest itself of its for-profit subsidiaries; &
Deny PP&L's rate increase.

5. You must sign and date your complaint below.

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

Margaret M. Stuski
Signature

March 29, 2004
Date

Continued on next page

DOCKETED
MAR 16 2004

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2004 MAR 29 AM 10:27
SECRETARY'S BUREAU

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

Lawyer's Name Margaret M. Stuski, Esquire

Street 908 Walnut Street

City Wormleysburg State PA Zip 17043

Area Code/Phone Number 610-517-2069

Mail to:

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

For more information, please contact the Secretary's Bureau at 717-772-7777.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Margaret M. Stuski :
908 Walnut Street :
Wormleysburg, PA 17043 :
Complainant :

2004

v. :

Pennsylvania Power & Light :
Two North Ninth Street :
Allentown, PA 18101-1179 :
& :

H.T. Lyons, Inc. :
P.O. Box 20050 :
Colony Drive Industrial Park :
Lehigh Valley, PA 18002 :

Respondents :

RECEIVED
2004 MAR 29 11:10:27
SECRETARY'S BUREAU

COMPLAINT

Introduction

Margaret M. Stuski (hereinafter "Stuski") hereby comes before the Public Utility Commission (hereinafter "PUC") and respectfully asks that the PUC Order that Pennsylvania Power & Light (hereinafter PP&L") be investigated and Order PP&L to divest itself of its for-profit subsidiary, H. T. Lyons (hereinafter "Lyons") and others and deny its request for a rate hike increase for the following reasons:

- 1.) Complainant Stuski is a residential utility customer of PP&L.
- 2.) Further, Stuski has participated in arbitration and other business proceedings regarding Lyons.

- 3.) PP&L is a regulated electric utility which the PUC has jurisdiction over regarding the conduct of its business.
- 4.) Lyons engages in the for-profit business as a mechanical contractor.
- 5.) Lyons is a fully-owned subsidiary of PP&L.
- 6.) PP&L sought approval from the PUC to acquire for-profit subsidiaries that are related to the construction business among others.
- 7.) PP&L's subsidiary Lyons has engaged in activities which hurt small businesses in the same industry.
- 8.) PP&L has supported Lyons in its activities by allowing Lyons to expend legal fees in excess of the amounts claimed against it.
- 9.) Lyons has utilized the resources of PP&L to intimidate small businesses and to dominate the local market.

COUNT I

- 10.) *Paragraphs 1 through 9 are incorporated by reference as if set forth fully herein.*
- 11.) Lyons entered into a contract to provide mechanical services for a renovation project to the Emergency Room at St. Luke's Hospital in Bethlehem, Pennsylvania.
- 12.) Lyons' contract contained a dispute resolution clause calling for arbitration under the American Arbitration Association Construction Dispute Guidelines.
- 13.) Lyons failed to file for arbitration and instead filed a Complaint in Court.
- 14.) Previously, Lyons had been involved in a construction contract that also called for arbitration.

15.) Instead of complying with that contract, Lyons employed self-help and filed a mechanic's lien against the job.

16.) In the St. Luke's matter, Lyons damaged the small business by employing the judicial system and forcing the business to expend legal fees to have the matter brought back to arbitration as was called for in the contract.

17.) The business was further damaged as it's final payment from St. Luke's was conditioned upon resolution of it's dispute with Lyons.

18.) Among other things, Lyons substituted a part of a specified piece of equipment, did not inform the design/builder or the Owner and was attempting to change out the part without notification to either party.

19.) Lyons, through it's Vice-President and later CEO, Richard Perosa, alternatively stated that PP&L's legal department had to approve a settlement and suggested an amount and other times suggested that PP&L would have nothing to do with a settlement.

20) Mr. Perosa's deceptive statements further injured the other business in trying to resolve this matter and added more time to the dispute.

21.) Overall, Lyons' attorney ran up legal fees against the business while trying to exhort a settlement.

22) The amount of legal fees was far in excess in proportion to what the amount of dispute between the parties was.

23.) It was undisputed that some money would be paid to Lyons upon release of the money owed to the design/builder by the Owner.

24.) The design/build company had closed during the many years of legal maneuvers used by Lyons and PP&L.

24.) Money out of the pocket of the design/build company was expended to try to bring this to a speedier conclusion but Lyons' attorneys further ran up legal fees.

25.) PP&L's massive legal resources are no match for small businesses trying to compete in the construction business.

26.) Lyons' activities were designed to intimidate and harass.

27.) Frequently during the course of the job, Richard Perosa simply threatened to not finish the job instead of using the dispute resolution processes within the contract that allowed for arbitration while the company was still supposed to keep working.

28.) Despite complaints to PP&L, Lyons was allowed and even encouraged by PP&L to keep up these type of activities that bullied small businesses in the market.

29.) In 2001, a complaint letter to was sent to Joseph Burns who was then President of Lyons.

30.) Mr. Burns did nothing and was even promoted to be Vice-President of PP&L.

WHEREFORE, Complainant asks that these activities be investigated and that PP&L be ordered to divest itself of it's for-profit subsidiaries.

COUNT II

29.) Paragraphs 1 through 30 are incorporated by reference as if set forth fully herein.

30.) PP&L had placed a lien against the personal residence of Complainant regarding business service that was initiated without Complainant's knowledge.

31.) Complainant filed a complaint regarding this action however, had to expend legal fees to defend this and was never reimbursed by PP&L.

32.) Complainant's complaint showed that PP&L was reckless in using attorneys and incurring legal fees for matters that could have been prevented by proper screening upon initiation of service.

33.) Complainant asks that the use of legal fees by PP&L be further investigated and publicly disclosed.


34.) Complainant contends that PP&L's misuse of attorney fees is a basis for denial of the proposed rate increase.

WHEREFORE, Complainant asks the PUC to deny PP&L's rate increase for the reasons set forth.

CONCLUSION

Complainant Margaret M. Stuski respectfully petitions the PUC to investigate the practices of PP&L and its for-profit companies regarding their market activities, their expenditures on legal fees, their relationship between each other and to deny the PP&L rate increase.

Respectfully submitted,


Margaret M. Stuski, Esquire
Complainant

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

July 15, 2004

PAUL E RUSSELL ASSOCIATE GENERAL COUNSEL
PPL ELECTRIC UTILITIES CORPORATION
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0011

Dear Sir/Madam:

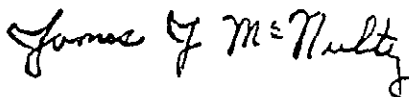
A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by MARGARET M STUSKI, ESQUIRE.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

DOCUMENT
JUL 16 2004

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbs

DOCUMENT
FOLDER

Kirkpatrick & Lockhart LLP

ORIGINAL

Payne Shoemaker Building
240 North Third Street
Harrisburg, PA 17101-1507
717.231.4500
www.kl.com

June 22, 2004

VIA HAND DELIVERY

James P. Melia
717.231.5842
Fax: 717.231.4501
jmelia@kl.com

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities, Inc.
Docket No. R-00049255 C001Q

Dear Secretary McNulty:

Enclosed for filing please find an original and three copies of the Complaint filed on behalf of Wal-Mart Stores East, LP in the above captioned matter.

Copies of this document have been served on the parties to this matter as indicated on the enclosed Certificate of Service.

Very truly yours,

DOCUMENT
FOLDER


James P. Melia
Counsel for Wal-Mart Stores East, LP

JPM/cem
Enclosures

cc: Hon. Allison K. Turner, ALJ (w/Enclosures)
Service List (w/Enclosures)

RECEIVED
2004 JUN 22 PM 3:45
SECRETARY'S BUREAU

HA-146602 v1 0950000-0102

33

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility
Commission

v.

PPL Electric Utilities, Inc.

Docket No. R-00049255 C.0012

SECRETARY'S BUREAU

2004 JUN 22 PM 3:45

RECEIVED

COMPLAINT OF WAL-MART STORES EAST, LP

AND NOW COMES, Wal-Mart Stores East, LP, a Delaware limited partnership ("Wal-Mart" or "Complainant"), by its counsel Kirkpatrick & Lockhart LLP, and hereby files this Complaint to Supplement No. 38 to Tariff Electric – Pa. P.U.C. No. 1 which was filed by PPL Electric Utilities, Inc. ("PPL"). Complainant avers as follows:

1. Complainant is Wal-Mart, a national retailer with 36 stores located in the PPL service territory. Wal-Mart's usage on an annual basis is 117,558,364 Kwh for a total expenditure of \$8.5 million.

2. Complainant's counsel in this proceeding is:

James P. Melia, Esquire
Kirkpatrick & Lockhart LLP
240 North Third Street
Harrisburg, PA 17101-1507
(717) 231-4500
(717) 231-4501 (Fax)
jmelia@kl.com

DOCKETED
JUL 16 2004

3. On or about March 29, 2004, PPL filed Supplement No. 38 to Tariff Electric – Pa. P.U.C. No. 1 to become effective on June 1, 2004. By Order entered May

7, 2004, the Public Utility Commission ("Commission") suspended this rate filing for further investigation until January 1, 2005.

4. Complainant's 36 retail locations in the PPL service territory are classified and served under PPL's GS-3 rate. The proposed rate increase would, if implemented, represent approximately a 7.8% increase to electric distribution charges currently being paid by Wal-Mart.

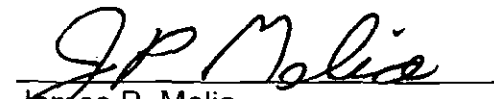
5. Complainant is a large commercial customer of PPL who will be detrimentally impacted by this rate increase.

6. Complainant believes the proposed rate request may be unjust and unreasonable.

7. Complainant understands that a prehearing conference occurred in this matter on May 19, 2004. It is Complainant's understanding that a hearing schedule was established with due dates for testimony of other parties of June 29, 2004. Complainant accepts this schedule as established at the prehearing conference and would adhere to all deadlines established in this case.

WHEREFORE, for all of the foregoing reasons, Wal-Mart respectfully requests that its Complaint be granted and the PPL rate increase be subjected to a full investigation and that such other relief be granted as necessary.

Respectfully submitted,


James P. Melia

Kirkpatrick & Lockhart LLP
240 North Third Street
Harrisburg, PA 17101-1507
(717) 231-4500
(717) 231-4501 (Fax)
jmelia@kl.com

Counsel for Wal-Mart Stores East, LP

Dated: June 22, 2004

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility
Commission

v.


PPL Electric Utilities, Inc.

:
:
:
:
:

Docket No. R-00049255

AFFIDAVIT

I, Angela Beehler, being duly sworn according to law, depose and say that I am Director of Energy Regulation of Wal-Mart Stores East, LP., a Delaware limited partnership, that I am authorized to and do make this affidavit for it; and that the facts set forth in the forgoing Complaint are true and correct to the best of my knowledge, information, and belief, and I expect the said Wal-Mart Stores East, LP. to be able to prove the same at any hearing hereof.



Angela Beehler
Director of Energy Regulation
Wal-Mart Stores East, LP.



Sworn and subscribed before me
This 14th day of June, 2004.



Notary Public

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility
Commission

v.

PPL Electric Utilities, Inc.

Docket No. R-00049255 00012

CERTIFICATE OF SERVICE

I hereby certify that I have this day served true and correct copies of the foregoing document upon the individuals listed, in accordance with the requirements of Section 1.54 (relating to service by a participant).

Via First Class Mail

Tanya McCloskey, Esquire
James A. Mullins, Esquire
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1923

Johnnie E. Simms, Esquire
Richard A. Kanaskie, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Steven C. Gray, Esquire
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101

Scott J. Rubin, Esquire
3 Lost Creek Drive
Selinsgrove, PA 17870

Michael W. Gang, Esquire
John H. Isom, Esquire
Morgan Lewis & Bockius LLP
One Commerce Square
417 Walnut Street
Harrisburg, PA 17101-1904

Kent D. Murphy, Esquire
Exelon Business Services Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

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

SECRETARY'S
BUREAU

2004 JUN 22 PM 3:45

RECEIVED

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704-4237

David A. McCormick, Esquire
U.S. Army Legal Services Agency
901 North Stuart Street, Room 713
Arlington, VA 22203-1837

Pamela C. Polacek, Esquire
David M. Kleppinger, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Louise A. Knight, Esquire
Saul Ewing LLP
2 North Second Street, 7th Floor
Harrisburg, PA 17101-1604

Roger E. Clark, Esquire
Sustainable Development Fund
718 Arch Street, Suite 300 North
Philadelphia, PA 19105-1591

Richard S. Herskovitz, Esquire
Duquesne Light Company
411 Seventh Avenue, 8th Floor
Pittsburgh, PA 15219

Hon. Phyllis Mundy, Chair
Northeast Delegation
House Box 202020
Harrisburg, PA 17120-2020

John L. Munsch, Esquire
Allegheny Energy
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Michael Fiorentino, Esquire
Clean Air Council
135 S. 19th Street, Suite 300
Philadelphia, PA 19103

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

Peter Adels, General Counsel
Citizens for Pennsylvania's Future
117 S. 17th Street, Suite 1801
Philadelphia, PA 19103


Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

Daniel Clearfield, Esquire
Kevin J. Moody, Esquire
Wolf Block Schorr & Solis-Cohen
212 Locust Street, Suite 300
Harrisburg, PA 17101

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

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

Kirkpatrick & Lockhart LLP
240 North Third Street
Harrisburg, PA 17101-1507
(717) 231-4500
(717) 231-4501 (Fax)
jmelia@kl.com


James P. Melia

Counsel for Wal-Mart Stores East, LP

Dated: June 22, 2004

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

July 15, 2004

PAUL E RUSSELL ASSOCIATE GENERAL COUNSEL
PPL ELECTRIC UTILITIES CORPORATION
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0012

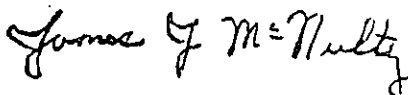
Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by WAL-MART STORE EAST, LP.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,



James J. McNulty
Secretary

DOCUMENT
FOLDER

(SEAL)

Certified Mail
Return Receipt Requested

dbs

DOCKETED
JUL 16 2004

Kirkpatrick & Lockhart LLP

ORIGINAL

Payne Shoemaker Building
240 North Third Street
Harrisburg, PA 17101-1507
717.231.4500
www.kl.com

June 23, 2004

VIA HAND DELIVERY

James P. Melia
717.231.5842
Fax: 717.231.4501
jmelia@kl.com

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities, Inc.
Docket No. R-00049255 C0013

Dear Secretary McNulty:

Enclosed for filing please find an original and three copies of the Complaint filed on behalf of Pennsylvania Energy Consortium in the above captioned matter.

Copies of this document have been served on the parties to this matter as indicated on the enclosed Certificate of Service.

Very truly yours,



James P. Melia
Counsel for Pennsylvania Energy Consortium

JPM/cem
Enclosures

cc: Hon. Allison K. Turner, ALJ (w/Enclosures)
Service List (w/Enclosures)

DOCUMENT
FOLDER

RECEIVED
2004 JUN 23 PM 3:25
SECRETARY'S BUREAU

HA-146938 v1 0950000-0102

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility
Commission

v.

PPL Electric Utilities, Inc.

Docket No. R-00049255

SECRETARY'S BUREAU

2004 JUN 23 PM 3: 25

RECEIVED

COMPLAINT OF PENNSYLVANIA ENERGY CONSORTIUM

AND NOW COMES, Pennsylvania Energy Consortium ("Complainant"), by its counsel Kirkpatrick & Lockhart LLP, and hereby files this Complaint to Supplement No. 38 to Tariff Electric – Pa. P.U.C. No. 1 which was filed by PPL Electric Utilities, Inc. ("PPL"). Complainant avers as follows:

1. Complainant is Pennsylvania Energy Consortium, a non-profit corporation consisting of 122 school districts and municipal governments located in the PPL service territory. Collectively, Complainant utilizes 374,390,000 Kwh of electricity annually.

2. Complainant's counsel in this proceeding is:

James P. Melia, Esquire
Kirkpatrick & Lockhart LLP
240 North Third Street
Harrisburg, PA 17101-1507
(717) 231-4500
(717) 231-4501 (Fax)
jmelia@kl.com

3. On or about March 29, 2004, PPL filed Supplement No. 38 to Tariff Electric – Pa. P.U.C. No. 1 to become effective on June 1, 2004. By Order entered May

7, 2004, the Public Utility Commission ("Commission") suspended this rate filing for further investigation until January 1, 2005.

4. Complainant's members in the PPL service territory are classified and served under PPL's GS-3 rate and LP-4 rate. The proposed rate increase would, if implemented, represent approximately a 7.8% increase to electric distribution charges currently being paid by Complainant.

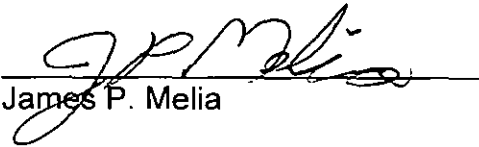
5. Complainant is a group of governmental/institutional customers of PPL who will be detrimentally impacted by this rate increase.

6. Complainant believes the proposed rate request may be unjust and unreasonable.

7. Complainant understands that a prehearing conference occurred in this matter on May 19, 2004. It is Complainant's understanding that a hearing schedule was established with due dates for testimony of other parties of June 29, 2004. Complainant accepts this schedule as established at the prehearing conference and would adhere to all deadlines established in this case.

WHEREFORE, for all of the foregoing reasons, Pennsylvania Energy Consortium respectfully requests that its Complaint be granted and the PPL rate increase be subjected to a full investigation and that such other relief be granted as necessary.

Respectfully submitted,


James P. Melia

Kirkpatrick & Lockhart LLP
240 North Third Street
Harrisburg, PA 17101-1507
(717) 231-4500
(717) 231-4501 (Fax)
jmelia@kl.com

Counsel for Pennsylvania Energy
Consortium

Dated: June 23, 2004

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility
Commission

v.

PPL Electric Utilities, Inc.

Docket No. R-00049255

AFFIDAVIT

I, Jeffrey L. Kimball, being duly sworn according to law, depose and say that I am President of Pennsylvania Energy Consortium; that I am authorized to and do make this affidavit for it; and that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief, and I expect the said Pennsylvania Energy Consortium to be able to prove the same at any hearing hereof.

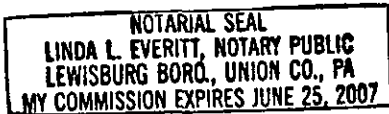


Jeffrey L. Kimball
President
Pennsylvania Energy Consortium

Sworn and subscribed before me
this 22nd day of June, 2004.



Notary Public



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility
Commission

v.

PPL Electric Utilities, Inc.

Docket No. R-00049255 ~~00013~~

SECRETARY'S BUREAU

2004 JUN 23 PM 3:25

RECEIVED

CERTIFICATE OF SERVICE

I hereby certify that I have this day served true and correct copies of the foregoing document upon the individuals listed, in accordance with the requirements of Section 1.54 (relating to service by a participant).

Via First Class Mail

Tanya McCloskey, Esquire
James A. Mullins, Esquire
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1923

Johnnie E. Simms, Esquire
Richard A. Kanaskie, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
P.O. Box 3265
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Allegheny Energy
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Michael Fiorentino, Esquire
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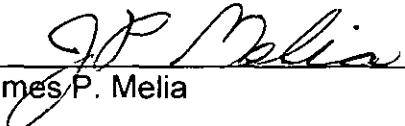
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Thomas Thomas Armstrong & Niesen
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P.O. Box 9500
Harrisburg, PA 17108-9500

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

Kirkpatrick & Lockhart LLP
240 North Third Street
Harrisburg, PA 17101-1507
(717) 231-4500
(717) 231-4501 (Fax)
jmelia@kl.com


James P. Melia

Counsel for Pennsylvania Energy
Consortium

Dated: June 23, 2004

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

July 15, 2004

PAUL E RUSSELL ASSOCIATE GENERAL COUNSEL
PPL ELECTRIC UTILITIES CORPORATION
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0013

Dear Sir/Madam:

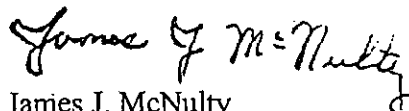
A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by PENNSYLVANIA ENERGY CONSORTIUM.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

DOCUMENT
FOLDER

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

DOCKETED
JUL 16 2004

dbS

RECEIVED

2004 JUN 29 AM 9:11

SECRETARY'S BUREAU

ORIGINAL R-00049255 C004

Formal Complaint Form
Pennsylvania Public Utility Commission

Please Print: (you may also type your answers directly onto the form as it appears on your screen)

1. Your name, mailing address and telephone number:

Name Donald E. McGarrigle

Street/P.O.Box 34 Larchwood Road Apt #

City Wyomissing, Pa State Pa Zip 19610-1944

County Berks Area Code/Home Phone 610-374-8570

Area Code/Work Phone

2. Name of company your complaint concerns: P P & L

3. What is your complaint? (Use additional paper if need more space).

SEE ATTACHED LETTER DATED 6/28/04

4. What do you want the Public Utility Commission to do about your complaint? (Use additional paper if need more space).

PRESENT
- REDUCE /RATE- OR FOREGO PROPOSED INCREASE

5. You must sign and date your complaint below.

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

Signature Donald E. McGarrigle

Date 6/28/04

Continued on next page

DOCUMENT FOLDER

DOCKETED JUL 16 2004

6

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

Lawyer's Name _____ NONE _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

Mail to:
Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

For more information, please contact the Secretary's Bureau at 717-772-7777.

34 Larchwood Road
Wyomissing, Pa. 19610-1944
June 28, 2004

Secretary
Pennsylvania Public Utility Comm.
P. O. Box 3265
Harrisburg, Pa. 17105-3265

Reference: Your File BCS #1696173

To Whom It May Concern:

As a 83 year old Sr. Citizen, on a fixed income, I am Opposed to the Rate Change Increase of 9.8. This increase would create additional hardship due to Cost of Living in Taxes, Food, Health Insurance, etc,

In planning to build my home in 1966, I spoke to a P.P.&L Rep: regarding a Heating System (Hydronic). The Rep at that time told me if I insulated to their specification I would be given a Preferred Rate not to exceed \$35.00 per month. At a later date, I was removed from the Preferred Rate due to the fact my home was heated by water. Note: This System requires electricity to heat same. The rest of my home is all Electric.

Over the years subsequent increases have brought my Monthly Cost Average to approximately \$233.00 per month. A 9.8 increase would add approximately \$23.00 per month to my present bill... In a recent flyer from P.P.&L. (Note to Customers on Special Residential Rate Schedules (Grandfathered).
WHAT HAPPENED TO MINE???

Your expeditious response to this letter would be greatly appreciated.

Very truly yours.



Donald E. McGarrigle

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

July 15, 2004

PAUL E RUSSELL ASSOCIATE GENERAL COUNSEL
PPL ELECTRIC UTILITIES CORPORATION
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0014

Dear Sir/Madam:

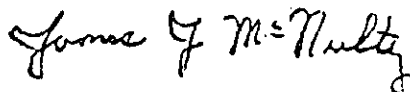
A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by DONALD E MCGARRIGLE.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

DOCKETED
JUL 16 2004

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbs

**DOCUMENT
FOLDER**

Curvin L. Snyder
1390 Valley Rd
Etters, PA 17319-9342

R-00049255 C00

ORIGINAL

RECEIVED
JUL 13 AM 8:43
SECRETARIAT BUREAU

Formal Complaint Form

Please Print.

1. Your name, mailing address and telephone number:

Name CURVIN L. Snyder

Street/P.O.Box 1390 Valley Rd Apt # _____

City Etters State PA Zip 17319

County York Area Code/Home Phone 717-938-6167

Area Code/Work Phone _____

2. Name of company your complaint concerns: PPL

3. What is your complaint? (Use additional paper if need more space).

see Attached sheet

4. What do you want the Public Utility Commission to do about your complaint?
(Use additional paper if need more space).

Reject The Rate INCREASE

5. You must sign and date your complaint below.

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

Curvin L. Snyder
Signature

July 12 - 04
Date

Continued on next page

DOCUMENT
FOLDER

DOCKETED
JUL 16 2004

3

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

Lawyer's Name _____
Street _____
City _____ State _____ Zip _____
Area Code/Phone Number _____

Mail to:
Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

**For more information, please contact the Secretary's Bureau at
717-772-7777.**

#3 questions

As a concerned citizen I want to bring to your attention a number of facts which are relevant to the rate increase

① Enclosed is Detroit News salary for Mr. Hecht of 699% increase

7,586,631 stock options 5,052,393

② PPL Foreign utilities has a 500,000,000 loss in Brazil and a 150,000,000 ^{plus} loss in Europe

③ Mr. Hecht is over compensated for the poor job he is doing managing of PPL

④ I am 70 yr old and retired from PPL have not received no cost of living pension in 5 yr, plus single mother with children for minimum wage cannot afford a 10% rate increase

⑤ please feel free to contact me if any questions.

50 CEO's

2003 salary	2003 bonus	Restricted stock award	Long-term incentive plan	Value on stock options exercised	Other compensation
11,000	\$6,000,000			\$22,592,957	\$621,599
13,410	\$2,532,206	\$12,844,751			\$255,591
4,000	\$1,648,000			\$13,385,346	\$4,531
30,768	\$450,000			\$13,872,500	\$13,477
0,000	\$1,638,750	\$2,977,895	\$660,858	\$6,960,000	\$119,267
0,000	\$2,775,000	\$4,200,900	\$2,515,200		\$1,850,800
0,000	\$2,538,000	\$5,716,000	\$1,423,776		\$2,000
15,289	\$1,400,000	\$2,733,360		\$5,193,931	\$401,605
2,692	\$1,875,000	\$4,536,550		\$2,929,953	\$285,365
0,000	\$1,400,000		\$5,698,176	\$1,035,713	\$332,468
0,000	\$5,250,000	\$3,142,773			\$354
0,000	\$1,125,000	\$6,970,256			\$265,675
0,000	\$1,672,000	\$3,142,400	\$1,458,605		\$653,012
5,016	\$800,000			\$5,812,396	\$313,303
0,000	\$6,405,550	\$13,148			\$138,000
7,008	\$1,075,981	\$972,140		\$4,748,335	\$41,581
3,923		\$1,537,135		\$5,052,393	\$8,180
0,000	\$812,500	\$812,500		\$4,544,559	\$55,862
1,283	\$3,500,000				\$213,465
0,000	\$556,935		\$1,730,107	\$895,081	\$2,500
1,768	\$540,000	\$2,337,000			\$109,076
0,000	\$1,758,420		\$879,337		\$6,000
0,000	\$1,500,000				\$525,971
0,000	\$1,341,060	\$1,337,999		\$93,719	\$74,074
0,000	\$351,400			\$1,813,549	\$16,529
346	\$1,046,893			\$982,523	\$1,714
0,000	\$1,498,161				\$128,678
142			\$775,492		\$867,753
0,000	\$606,200			\$907,168	\$192,694
032	\$830,180	\$493,053			\$146,294
0,000	\$153,000	\$1,206,330			\$17,790
0,000	\$800,000			\$429,038	\$9,333
135	\$898,000				\$6,000
0,000	\$750,000	\$242,213	\$110,902	\$100,000	
0,000	\$626,892				\$6,000
0,000	\$817,500				\$11,425
0,000	\$500,000			\$399,922	
54				\$111,879	\$414,085
77	\$28,703			\$240,328	\$116,666
0,000	\$40,000			\$617,289	\$19,400
0,000	\$368,500	\$1,881			\$43,744
0,000	\$161,500			\$218,702	\$58,383
14			\$209,542		\$3,623
0,000					\$34,032
13	\$142,154	\$65,054			\$26,794
7					\$127,523
8					\$43,636
8	\$83,446				\$17,522
0,000					\$19,730
0					\$150,770

d from chief operating officer to CEO on June 25, 2003.
 l the next day by Jan L. Murley.

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 +.57
 +2.24
 +.15
 -.66
 +.65
 +.04
 +.35
 +.47
 -.52
 +.23
 -.39
 +.34
 -2.26
 3 -.49
 4 +.11
 0 +.46
 5 -.15

TOP HIGHEST PA

TOTAL COMPENSATION

Rank	Company	CEO	2003 pay	2002 pay	% change from 2002	
1	Comcast Corp.	Brian L. Roberts	\$31,215,556	\$9,934,431	214%	\$2
2	Sprint Corp.	Gary D. Forsee (1)	\$16,445,958	n/a	n/a	
3	Select Medical Corp.	Robert A. Ortenzio	\$15,861,877	\$2,773,651	472%	
4	M&T Financial	Robert G. Wilmers	\$14,816,745	\$1,011,355	1,365%	
5	Lear Corp.	Robert E. Rossiter	\$13,356,770	\$5,637,834	137%	\$1
6	Verizon	Ivan G. Seidenberg	\$12,841,900	\$9,514,400	35%	\$1
7	Foot Locker	Matthew D. Serra	\$11,179,776	\$6,839,007	63%	\$1
8	Exelon	John W. Rowe	\$10,914,185	\$4,804,306	127%	\$1
9	PNC Corp.	James E. Rohr	\$10,509,560	\$3,465,930	203%	\$1
10	PPG Industries Inc.	R.W. LeBoeuf	\$9,416,357	\$3,246,137	190%	\$
11	Wachovia	G. Kennedy Thompson	\$9,393,127	\$14,996,529	-37%	\$1
12	Mellon Financial Corp.	Martin G. McGuinn	\$9,260,931	\$3,462,373	167%	\$
13	Norfolk Southern Corp.	David R. Goode	\$7,926,017	\$4,618,703	72%	\$1
14	Penn National Gaming Inc.	Peter M. Carlino	\$7,710,715	\$7,544,048	2%	\$
15	Ingersoll Rand Co.	H.L. Henkel	\$7,656,698	\$3,957,406	93%	\$1
16	UGI Corp.	Lon R. Greenberg	\$7,595,045	\$3,716,575	104%	\$
17	PPI Corp.	William F. Hecht	\$7,586,631	\$949,999	699%	\$
18	Health Management Associates	Joseph V. Vumbacco	\$6,875,421	\$2,156,993	219%	\$
19	Harley-Davidson Inc.	Jeffrey L. Bleustein	\$4,574,748	\$4,491,992	2%	\$
20	Yellow Roadway Corp.	William D. Zollars	\$4,002,623	\$2,520,534	59%	\$
21	Electronic Data Systems Corp.	Michael H. Jordan (2)	\$3,766,844	n/a	n/a	\$
22	Hershey Foods Corp.	Richard H. Lenny	\$3,593,757	\$3,956,384	-9%	\$
23	Tyco International Ltd.	Edward D. Breen	\$3,525,971	\$15,503,362	-77%	\$1
24	Sysco Corp.	Charles H. Cotros	\$3,346,852	\$4,718,809	-29%	\$1
25	United Parcel Service	Michael P. Eskew	\$3,044,478	\$1,952,864	56%	\$1
26	Supervalu Inc.	Jeffrey Noddle	\$2,897,476	\$881,570	229%	\$
27	Rite Aid Corp.	Mary F. Sammons (3)	\$2,866,839	\$3,288,443	-13%	\$1
28	FirstEnergy Corp.	H. Peter Burg	\$2,694,387	\$1,894,557	42%	\$1
29	Dentsply International Inc.	John C. Miles II	\$2,446,062	\$2,383,456	3%	\$
30	York International Corp.	Michael R. Young	\$2,293,559	\$1,365,265	68%	\$
31	JLG Industries Inc.	William M. Lasky	\$1,977,120	\$1,132,455	75%	\$6
32	Carlisle Companies	Richmond D. McKinnish	\$1,963,371	\$1,298,160	51%	\$1
33	Herley Industries	Lee N. Blatt	\$1,686,835	\$5,823,563	-71%	\$
34	PA Real Estate Investment Trust	Ronald Rubin	\$1,628,115	\$1,000,637	63%	\$4
35	Harsco Corp.	D.C. Hathaway	\$1,510,892	\$2,421,327	-38%	\$6
36	Bon-Ton Stores Inc.	Tim Grumbacher	\$1,453,925	\$839,722	73%	\$6
37	International Steel Group	Rodney B. Mott	\$1,432,922	\$1,981,517	-28%	\$6
38	BISYS Insurance	Lynn J. Magnum	\$1,359,618	\$6,591,044	-79%	\$1
39	Fulton Financial Corp.	Rufus A. Fulton Jr.	\$1,163,474	\$1,455,559	-20%	\$1
40	Penn Commerce Bancorp.	Gary L. Nalbandian	\$891,689	\$207,584	330%	\$
41	Donegal Group Inc.	Donald H. Nikolaus	\$844,125	\$641,373	32%	\$4
42	Community Banks Inc.	Eddie L. Dunkleberger	\$763,585	\$567,225	35%	\$3
43	Glatfelter	G. H. Glatfelter II	\$695,169	\$885,400	-21%	\$4
44	Weis Markets Inc.	Robert F. Weis	\$594,032	\$594,425	0%	\$5
45	Waypoint	David E. Zuern (4)	\$576,745	\$500,014	15%	\$1
46	Boyd's Collection Ltd.	Jean-Andre Rougeot (5)	\$550,600	\$709,938	-22%	\$4
47	Susquehanna Bancshares Inc.	William J. Reuter	\$492,834	\$431,886	14%	\$2
48	Northwest Bancorp Inc.	William J. Wagner	\$455,396	\$407,488	12%	\$3
49	C-cor.net Corp.	David A. Woodie	\$338,960	\$2,012,667	-83%	\$5
50	TB Woods Corp.	Thomas C. Foley (6)	\$321,010	\$393,554	-18%	\$1

Notes:

(1) Sprint's Forsee was named CEO on March 19, 2003. (2) Electronic Data Systems' Jordan was named CEO on March 20, 2003. (3) Rite Aid's Sammons was promoted from chief operating officer to CEO on June 1, 2003. (4) Waypoint's Zuern was promoted from chief operating officer to CEO on June 1, 2003. (5) Boyd's CEO Rougeot left the company on Oct. 20, 2003, and was replaced by Jean-Andre Rougeot. (6) TB Woods' Foley took a leave of absence in August 2003 to accept a job as director of Private Sector Development for the Coalition Provisional Authority in Iraq.

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

July 15, 2004

PAUL E RUSSELL ASSOCIATE GENERAL COUNSEL
PPL ELECTRIC UTILITIES CORPORATION
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0015

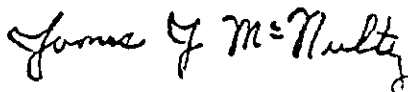
Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by CURVIN L SNYDER.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbS

DOCKETED
JUL 16 2004

DOCUMENT
FOLDER

RECEIVED

R-00049255006

2004 JUL 13 AM 8:12

FORMAL COMPLAINT FORM
Pennsylvania Public-Utility Commission

ORIGINAL

Please Print: **SECRETARY'S BUREAU**

1. Your Name, Mailing Address and Telephone Number.

Name William J. Junkin III

Street/P.O. Box 438 S. 25th St Apt.# _____

City Harrisburg State Pa Zip 17104

County Dauphin Home Telephone-Area Code (717) 557-9209

Work Telephone-Area Code (717) 238-7095

2. Name of Company your complaint concerns: PP&L

3. What is your complaint?

I want the PUC to decline/reject the
rate increase proposed by the above company.
I think a smaller increase would be acceptable.
This is based on the soaring inflation rates and
recovering economy

DOCUMENT
FOLDER

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

(-over-)

DOCKETED
JUL 16 2004

4

4. What do you want the Public Utility Commission to do about your complaint?
Reduce, reject the proposed rate increase. 3.7%
is way to much

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

5. You must sign and date your complaint below.

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

William J. Jambert
Original Signature of complaining person

7-10-2004
Date

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

Lawyer's Name _____
Street _____
City _____ State _____ Zip _____
Telephone Number-Area Code (_____) _____

To whom it may concern:

My name is William Junkin. I am a customer with UGI Utilities, Inc. I am requesting a formal complaint form. I would like the form to be sent to the address below.

William J. Junkin III

438 S. 25th St

HBG, Pa 17104

This letter is in reference to the December 1, 2004 proposed rate increase. Thank You.

Sincerely,

William J. Junkin III

RECEIVED
2004 JUN 21 AM 9:07
SECRETARY'S BUREAU

47

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

July 15, 2004

PAUL E RUSSELL ASSOCIATE GENERAL COUNSEL
PPL ELECTRIC UTILITIES CORPORATION
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0016

Dear Sir/Madam:

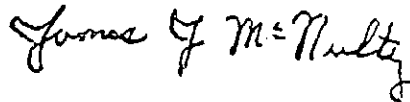
A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by WILLIAM J JUNKIN III.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

DOCKETED
JUL 16 2004

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbb

**DOCUMENT
FOLDER**

ORIGINAL

R-00049255C0017

Formal Complaint Form
Pennsylvania Public Utility Commission

SECRETARY'S BUREAU

2004 JUN 2 AM 9:14

RECEIVED

Please Print: (you may also type your answers directly onto the form as it appears on your screen)

1. Your name, mailing address and telephone number:

Name Philip A. Trump

Street/P.O.Box 3229 Carbon St. Apt # _____

City Whitchell State Pa. Zip 18052

County Lehigh Area Code/Home Phone 610-433-7131
Area Code/Work Phone None - disabled do not work

2. Name of company your complaint concerns: PP+L Utilities

3. What is your complaint? (Use additional paper if need more space).

In my bill there is a charge for people who do not pay their bills. I should not be responsible for other people's bills. I am on disability, yet I pay my bills. I used to be a state caseworker and I knew of plenty people who simply did not want to pay their bills. Why are they not cut off then, I saw bills in the thousands, yet PP+L sent me a discontinuance letter when I

4. What do you want the Public Utility Commission to do about your complaint? (Use additional paper if need more space).

I want to know exactly how much I am being charged instead of a percentage amount. Then I will pay my bill minus what I am now paying for people who do not pay their bills. That is not my responsibility.

was in the hospital and my bill was only for about \$70.00. Why is that not PP+L let other allow their bills go into the thousands without paying them. Is it because I am white.

5. You must sign and date your complaint below.

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

Philip A. Trump
Signature

6/18/04
Date

Continued on next page

DOCUMENT FOLDER

DOCKETED
AUG 03 2004

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

Have not gotten an attorney yet

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

Mail to:

Secretary

Pennsylvania Public Utility Commission

P. O. Box 3265

Harrisburg, PA 17105-3265

For more information, please contact the Secretary's Bureau at 717-772-7777.

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

JULY 29, 2004

PAUL E RUSSELL ASSOCIATE GENERAL COUNSEL
PPL ELECTRIC UTILITIES CORPORATION
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0017

Dear Sir/Madam:

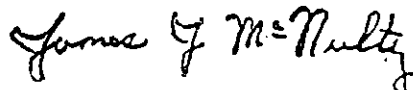
A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by PHILLIP A TRUMP.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

**DOCUMENT
FOLDER**

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbS

DOCKETED
AUG 03 2004

ORIGINAL

Payne Shoemaker Building
240 North Third Street
Harrisburg, PA 17101-1507
717.231.4500
www.kl.com

August 11, 2004

VIA HAND DELIVERY

James P. Melia
717.231.5842
Fax: 717.231.4501
jmelia@kl.com

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities, Inc.
Docket No. R-00049255 C0018

Dear Secretary McNulty:

Enclosed for filing please find an original and three copies of the Complaint filed on behalf of the Pennsylvania Retailers Association in the above captioned matter.

Copies of this document have been served on the parties to this matter as indicated on the enclosed Certificate of Service.

Very truly yours,


James P. Melia
Counsel for Pennsylvania Retailers Association

DOCUMENT
FOLDER

JPM/cem
Enclosures

cc: Hon. Allison K. Turner, ALJ (w/Enclosures)
Service List (w/Enclosures)

RECEIVED
2004 AUG 11 PM 3:32
SECRETARY'S BUREAU

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility
Commission

v.

PPL Electric Utilities, Inc.

Docket No. R-00049255 **0018**

COMPLAINT OF PENNSYLVANIA RETAILERS ASSOCIATION

AND NOW COMES, Pennsylvania Retailers Association ("Complainant"), by its counsel Kirkpatrick & Lockhart LLP, and hereby files this Complaint to Supplement No. 38 to Tariff Electric – Pa. P.U.C. No. 1 which was filed by PPL Electric Utilities, Inc. ("PPL"). Complainant avers as follows:

1. Complainant is an association of large retailers with member stores in the PPL service territory.

2. Complainant's counsel in this proceeding is:

James P. Melia, Esquire
Kirkpatrick & Lockhart LLP
240 North Third Street
Harrisburg, PA 17101-1507
(717) 231-4500
(717) 231-4501 (Fax)
jmelia@kl.com

DOCKETED
AUG 17 2004

3. On or about March 29, 2004, PPL filed Supplement No. 38 to Tariff Electric – Pa. P.U.C. No. 1 to become effective on June 1, 2004. By Order entered May

**DOCUMENT
FOLDER**

7, 2004, the Public Utility Commission ("Commission") suspended this rate filing for further investigation until January 1, 2005.

4. Complainant's members' stores in the PPL service territory are classified and served under PPL's GS-3 and LP-4 rate classes. The proposed rate increase would, if implemented, represent approximately a 7.8% increase to electric distribution charges currently being paid by Complainant.

5. Complainant is an association whose members are large commercial customers of PPL who will be detrimentally impacted by this rate increase.

6. Complainant believes the proposed rate request may be unjust and unreasonable.

7. Complainant understands that a prehearing conference occurred in this matter on May 19, 2004. It is Complainant's understanding that a hearing schedule was established with due dates for testimony of other parties of June 29, 2004. Complainant accepts this schedule as established at the prehearing conference and would adhere to all deadlines established in this case.

WHEREFORE, for all of the foregoing reasons, Pennsylvania Retailers Association respectfully requests that its Complaint be granted and the PPL rate increase be subjected to a full investigation and that such other relief be granted as necessary.

Respectfully submitted,


James P. Melia

Kirkpatrick & Lockhart LLP
240 North Third Street
Harrisburg, PA 17101-1507
(717) 231-4500
(717) 231-4501 (Fax)
jmelia@kl.com

Counsel for Pennsylvania Retailers
Association

Dated: August 11, 2004

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility
Commission

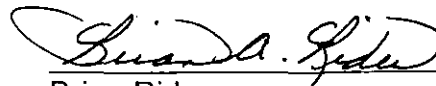
v.

PPL Electric Utilities, Inc.

Docket No. R-00049255

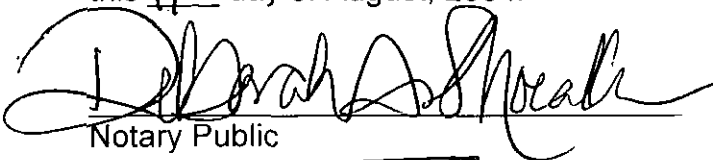
AFFIDAVIT

I, Brian Rider, being duly sworn according to law, depose and say that I am Executive Director of the Pennsylvania Retailers Association; that I am authorized to and do make this affidavit for it; and that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief, and I expect the said Pennsylvania Retailers Association to be able to prove the same at any hearing hereof.

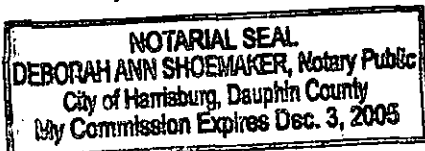


Brian Rider
Executive Director
Pennsylvania Retailers Association

Sworn and subscribed before me
this 11th day of August, 2004.



Notary Public



ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility
Commission

v.

PPL Electric Utilities, Inc.

Docket No. R-00049255 C 0018

CERTIFICATE OF SERVICE

I hereby certify that I have this day served true and correct copies of the foregoing document upon the individuals listed, in accordance with the requirements of Section 1.54 (relating to service by a participant).

Via First Class Mail

Tanya McCloskey, Esquire
James A. Mullins, Esquire
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1923

Johnnie E. Simms, Esquire
Richard A. Kanaskie, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Steven C. Gray, Esquire
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101

Scott J. Rubin, Esquire
3 Lost Creek Drive
Selinsgrove, PA 17870

Michael W. Gang, Esquire
John H. Isom, Esquire
Morgan Lewis & Bockius LLP
One Commerce Square
417 Walnut Street
Harrisburg, PA 17101-1904

Kent D. Murphy, Esquire
Exelon Business Services Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

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

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704-4237

David A. McCormick, Esquire
U.S. Army Legal Services Agency
901 North Stuart Street, Room 713
Arlington, VA 22203-1837

Pamela C. Polacek, Esquire
David M. Kleppinger, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
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Harrisburg, PA 17108-1166

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718 Arch Street, Suite 300 North
Philadelphia, PA 19105-1591

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Pittsburgh, PA 15219

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Northeast Delegation
House Box 202020
Harrisburg, PA 17120-2020

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Harrisburg, PA 17101-1507
(717) 231-4500
(717) 231-4501 (Fax)
jmelia@kl.com


James P. Melia

Counsel for Pennsylvania Retailers A
Association

Dated: August 11, 2004

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

August 12, 2004

PAUL E RUSSELL ASSOCIATE
GENERAL COUNSEL, PPL
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0018

Dear Sir/Madam:

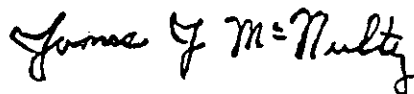
A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by PENNSYLVANIA RETAILERS ASSOCIATION.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

DOCKETED
AUG 17 2004

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

dbs

**DOCUMENT
FOLDER**

ORIGINAL

Pennsylvania Public Utility Commission

Formal Complaint Form

R-00049255 C0019

RECEIVED
2004 SEP 15 AM 8:59
SECRETARY'S BUREAU

Please Print.

1. Your name, mailing address, telephone number and utility account number:

Name Christy Meyers
Street/P.O.Box 178 Crocus Court Apt # _____
City Quakertown State PA Zip 18951
Area Code/HOME Phone 267-733-2899 Area Code/WORK Phone N/A
Utility Account Number N/A

If the above mailing address differs from the address where the utility service is provided, list this information below.

Name _____
Street/P.O. Box _____
City _____ State _____ Zip _____

2. Name of utility company your complaint concerns: PPL utilities

3. Type of Utility (circle one):

GAS WATER MOTOR CARRIER
STEAM HEAT ELECTRIC SEWER
TELEPHONE - (LOCAL OR LONG DISTANCE)

DOCUMENT FOLDER

What is your complaint? (Use additional paper if you need more space and provide copies of any relevant documentation you believe will support your complaint).

Received notice on 9/04 that my electric cost could double on Oct 31. No detailed, reasonable reason was given for such a huge price hike.

DOCKETED
SEP 22 2004

5. What do you want the Public Utility Commission to do about your complaint?
(Use additional paper if you need more space).

6. Ensure costs do not increase by more than 20%. Review management practices to ensure that future demands for outlandish increases are not allowed approved.
You must sign and date your complaint below.

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

Christy Meyers 9/11/04
Signature Date

7. If you are represented by a lawyer in this matter you must provide your lawyer's name, address and telephone number.

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

8. Mail to:

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

If you have additional questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

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

September 17, 2004

PAUL E RUSSELL
ASSOCIATE GENERAL COUNSEL, PPL
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL ELECTRIC UTILITIES CORPORATION

Docket Number R-00049255C0019

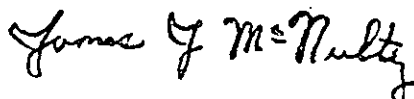
Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by CHRISTY MEYERS.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

db5

DOCKETED
SEP 22 2004

**DOCUMENT
FOLDER**

ORIGINAL

Pennsylvania Public Utility Commission

Formal Complaint Form

R - 00049255 C0020

Please Print.

1. Your name, mailing address, telephone number and utility account number:

Name STEVEN P. CARLILE
Street/P.O.Box 831 PEQUA AVE Apt # A
City GAP State PA Zip 17527
Area Code/HOME Phone 717-442-7905 Area Code/WORK Phone _____
Utility Account Number 76610-99053

If the above mailing address differs from the address where the utility service is provided, list this information below.

Name _____
Street/P.O. Box **DOCKETED** **DOCUMENT**
DEC 27 2004 **FOLDER**
City _____ State _____ Zip _____

2. Name of utility company your complaint concerns: PPL Electric Utilities

3. Type of Utility (circle one):

GAS WATER MOTOR CARRIER

STEAM HEAT **ELECTRIC** SEWER

TELEPHONE - (LOCAL OR LONG DISTANCE)

4. What is your complaint? (Use additional paper if you need more space and provide copies of any relevant documentation you believe will support your complaint).

I protest PPL's request for a rate hike, a rate hike of 10%. I protest any rate hike whatsoever. I am on a fixed income, SSI, and this increase would be a hardship for me.

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

December 8, 2004

PAUL E RUSSELL
ASSOCIATE GENERAL COUNSEL, PPL
TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

RE: PA PUC vs PPL
Docket Number R-00049255C0020


Dear Sir/Madam:

A Complaint has been filed against you in the above-captioned matter before the Pennsylvania Public Utility Commission by STEVEN P CARLYLE.

This complaint, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. The Pennsylvania Public Utility Code, 66 Pa. C.S., requires the Commission to serve on each party named in a complaint a copy of the complaint.

Within twenty (20) days from the date on which this complaint is served, you may either satisfy this complaint or comply with the provisions of 52 Pa. Code, Section 5.61 et seq., as amended.

Very truly yours,


James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

db's

DOCUMENT
FOLDER

DOCKETED
DEC 27 2004