

BURKE VULLO REILLY ROBERTS

ATTORNEYS AT LAW

1460 Wyoming Avenue
Forty Fort, PA 18704
Phone: (570) 288-6441 ♦ Fax: (570) 288-4598

*Formerly Burke & Burke
Thomas F. Burke, Sr. (1932-1972)*

JOSEPH L. VULLO
jlvullo@bvrrlaw.com

www.bvrrlaw.com

April 3, 2007

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

ORIGINAL

RE: In Re: PPL Electric Utilities Corporation for Rate Increase
Docket No: R-00072155

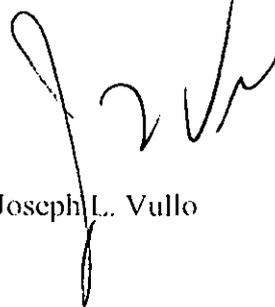
Dear Secretary McNulty:

Enclosed for filing please find an original and four (4) copies of Petition to Intervene on behalf of the Commission on Economic Opportunity in the above-referenced proceeding. I would ask that you provide me with a time-stamped copy of the Petition in the self-addressed, stamped envelope enclosed.

By copy of this correspondence, I am serving PPL Electric Utilities Corporation.

If you need anything further from me, please do not hesitate to contact me.

Respectfully submitted,



Joseph L. Vullo

JLV/jar
encls.

cc: PPL Electric Utilities Corporation

RECEIVED
2007 APR -5 AM 8:49
COMMUNICATIONS SECTION

DOCUMENT
FOLDER

DOCKETED
APR 12 2007

25

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
2007 APR -5 AM 8:49
SECRETARY'S BUREAU

IN RE: Application of PPL Electric Utilities : Docket No. R-00072155
for Rate Increase :

COMMISSION ON ECONOMIC OPPORTUNITY'S
PETITION TO INTERVENE

NOW COMES, the Commission on Economic Opportunity (CEO), by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter, averring as follows:

1. The Petitioner, Commission on Economic Opportunity, is a not-for-profit corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal office located at 165 Amber Lane, P.O. Box 1127, Wilkes-Barre, Luzerne County, Pennsylvania, 18703-1127. CEO's telephone number is (570) 826-0510.

2. CEO is an advocate for its clients - the low income population of Luzerne County - and has been directly involved in assuring that low income persons' utility costs are contained through counseling, advice, payment assistance and energy conservation measures.

3. CEO seeks permission to intervene in PPL Electric Utilities' request for a rate increase filed with the Commission pursuant to the above-captioned docket number.

4. PPL Electric Utilities serves customers in numerous counties, including Luzerne County.

5. CEO seeks permission to intervene in PPL Electric Utilities' request for a rate increase to examine the effect of the proposed rate increase on PPL Electric Utilities' customers, particularly low income customers.

DOCKETED
APR 12 2007

DOCUMENT
FOLDER

6. CEO is also intervening to investigate whether the Company's universal service programs are appropriately funded and available and if those programs will be appropriately funded and available if the proposed rate increase is granted.

7. CEO's participation as an active party in this proceeding is required to protect its substantial interests and the substantial interests of the low income citizens it represents in ensuring that utility rates remain affordable to its clients. Accordingly, CEO's participation in this proceeding will serve the public interest.

8. Because CEO represents low income citizens in Luzerne County, the interests of its clients are not protected by any other party to this action.

9. CEO has been granted active party status in numerous other utility cases in which it has petitioned to intervene.

POSITIONS

10. CEO takes no position at this time regarding PPL Electric Utilities' request for a rate increase but CEO's participation in this proceeding is, in part, to study the effect of the proposed rate increase on the Company's low income customers and whether the Company's universal service programs will be appropriately funded and available.

11. There is a substantial public interest in ensuring that the Company's universal service programs are appropriately funded and available and the effect, if any, on those programs if the rate increase is granted.

REQUEST FOR RELIEF

WHEREFORE, the Commission on Economic Opportunity respectfully requests that the Commission:

12. Receive for filing and docket this Petition to Intervene and order that CEO be an active party to such proceedings and be placed on all services lists.

13. Order that the following individuals be designated as CEO's recipients for service:

A. Eugene M. Brady
Commission on Economic Opportunity
165 Amber Lane
P.O. Box 1127
Wilkes-Barre, PA 18703-1127
Phone: (570) 826-0510
Fax: (570) 829-1665
e-mail: hebegebe@sunlink.net

B. Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
Phone: (570) 288-0700
Fax: (570) 288-4598
e-mail: jlvullo@aol.com

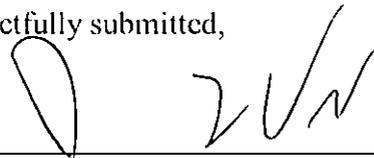
14. Order that each party to the proceedings provide CEO's designated recipient with copies of all papers filed.

15. Order that public hearings be conducted in PPL Electric Utilities' service territories.

16. Order that the matter be referred to the Office of Administrative Law Judges for an investigation and hearing on the Company's proposed request.

17. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,



JOSEPH L. VULLO, ESQUIRE
I.D. No. 41279
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-0700
e-mail: jlvullo@bvrrlaw.com
Attorney for Commission on Economic Opportunity

VERIFICATION

I, EUGENE M. BRADY, Executive Director of Commission on Economic Opportunity, hereby verify that I am authorized to execute this Verification and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information and belief.

COMMISSION ON ECONOMIC
OPPORTUNITY

BY: 
EUGENE M. BRADY, Executive Director

Dated: 4-3-07

RECEIVED
2007 APR 12 AM 8:42
17-0000
SECRETARY'S BUREAU

BURKE VULLO REILLY ROBERTS

ATTORNEYS AT LAW

1460 Wyoming Avenue
Forty Fort, PA 18704
Phone (570) 288-6441 ♦ Fax (570) 288-1598

*Formerly Burke & Burke
Thomas F. Burke, Sr. (1932-1972)*

JOSEPH L. VULLO
jlvullo@bvrrlaw.com

www.bvrrlaw.com

April 10, 2007

DOCUMENT
FOLDER

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

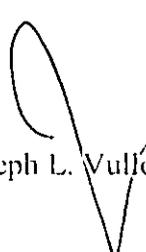
RE: In Re: PPL Electric Utilities Corporation for Rate Increase
Docket No: R-00072155

Dear Secretary McNulty:

Enclosed for filing please find an original and four (4) copies of the Verification signed by Eugene M. Brady, Executive Director of Commission on Economic Opportunity. This Verification was to be attached to the Petition to Intervene filed by CEO under cover of my April 3, 2007 correspondence.

If you need anything further from me, please do not hesitate to contact me.

Respectfully submitted,


Joseph L. Vullo

JLV/jar
encls.

cc: Kay S. Best - PA PUC

RECEIVED
2007 APR 12 AM 8:41
SECRETARY'S BUREAU

COMMONWEALTH OF PENNSYLVANIA



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

ORIGINAL

April 12, 2007

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

**DOCUMENT
FOLDER**

RECEIVED
2007 APR 12 PM 3:59
PAUC
SECRETARY'S BUREAU

RE: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Base Rate Proceeding
Docket No. R-00072155

Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the Notice of Appearance on behalf of the Office of Consumer Advocate, in the above-referenced proceeding.

Copies have been served on the parties of record as indicated on the enclosed Certificate of Service.

Sincerely,

Aron J. Beatty
Assistant Consumer Advocate
PA Attorney I.D. # 86625

Enclosures

cc: Chief Administrative Law Judge
Office of Special Assistants
Parties of Record

00093434

82

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. :
PPL Electric Utilities Corporation :
Base Rate Proceeding :

Docket No. R-00072155

2007 APR 12 PM 3:59
RECEIVED
SECRETARY'S BUREAU

NOTICE OF APPEARANCE

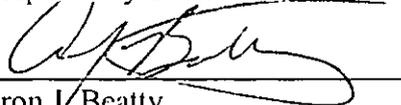
Please enter my appearance in the above-designated matter on behalf of the Office of Consumer. I am authorized to accept service on behalf of said participant in this matter.

X. On the basis of this notice, I request a copy of each document hereafter issued by the Commission in this matter.

____. I am already receiving or have access to a copy of each document issued by the Commission in this matter (alone, or in a consolidated proceeding) and do not on the basis of this notice require an additional copy.

**DOCUMENT
FOLDER**

Respectfully Submitted, _____



Aron J. Beatty
Assistant Consumer Advocate
PA Attorney I.D. # 86625
E-Mail: ABeatty@paoca.org
Jennedy E. Santolla
Assistant Consumer Advocate
PA Attorney I.D. # 203098
E-Mail: JSantolla@paoca.org

Counsel for:
Irwin A. Popowsky
Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: April 12, 2007
00093451

DOCKETED
APR 17 2007

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-00072155
	:	
PPL Electric Utilities Corporation	:	
Base Rate Proceeding	:	

I hereby certify that I have this day served a true copy of the foregoing document, Notice of Appearance of the Office of Consumer Advocate, 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 2007.

SERVICE BY E-MAIL AND INTEROFFICE MAIL

Johnnie E. Simms, Esquire
 Office of Trial Staff
 Pennsylvania Public Utility Commission
 Commonwealth Keystone Building
 400 North Street
 Harrisburg, PA 17105-3265

RECEIVED
 2007 APR 12 PM 3:59
 SECRETARY'S BUREAU

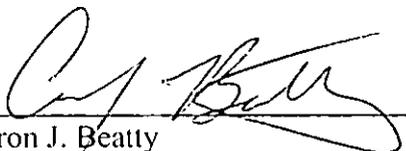
SERVICE BY E-MAIL and FIRST CLASS MAIL

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

David M. Kleppinger, Esquire
 McNeese, Wallace, & Nurick, LLP
 P.O. Box 1166
 100 Pine Street
 Harrisburg, PA 17108
 Counsel for: *PPL Electric Utilities Corporation*

William R. Lloyd
Small Business Advocate
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101
Counsel for: *Office of Small Business Advocate*

Charles McPhedran
Senior Attorney
PennFuture
1518 Walnut Street
Suite 1100
Philadelphia, PA 19102
Counsel for: *PennFuture*



Aron J. Beatty
Assistant Consumer Advocate
PA Attorney I.D. # 86625
E-Mail: ABeatty@paoca.org
Jennedy E. Santolla
Assistant Consumer Advocate
PA Attorney I.D. # 203098
E-Mail: JSantolla@paoca.org

Counsel for:
Irwin A. Popowsky
Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152

00093436

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-00072155
 :
 PPL Electric Utilities Corporation :

ORIGINAL

NOTICE OF APPEARANCE

Please enter the appearance of the Office of Trial Staff of the Pennsylvania Public Utility Commission in the above-captioned proceeding. Prosecutor(s) for the Office of Trial Staff, in addition to the undersigned will be:

**KENNETH L. MICKENS, ESQUIRE
CHARLES DANIEL SHIELDS, ESQUIRE**

**DOCUMENT
FOLDER**

On the basis of this notice, I request a copy of each document hereafter issued by the Commission in this matter be addressed to:

Kenneth L. Mickens, Esquire
Charles Daniel Shields, Esquire
Pa. Public Utility Commission
Office of Trial Staff
P.O. Box 3265
Harrisburg, PA 17105-3265
(717) 787-1976

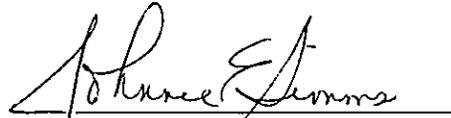
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APR 20 2007

SECRETARY'S BUREAU

2007 APR 19 PM 2:21

RECORDED

44



Johnnie E. Simms
Chief Prosecutor
PA Attorney I.D. #33911

Kenneth L. Mickens
Senior Prosecutor
PA Attorney I.D. #31255
kmickens@state.pa.us

Charles Daniel Shields
Senior Prosecutor
PA Attorney I.D. #29363
chshields@state.pa.us

Dated: April 19, 2007

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
2007 APR 19 PM 2:21
SECRETARY'S BUREAU

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

Docket No. R-00072155

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Notice of Appearance**,
dated April 19, 2007, either personally, by first class mail, electronic mail, express mail
and/or by fax upon the persons listed below:

Aron J. Beatty
Jennedy E. Santolla
Office of Consumer Advocate
555 Walnut Street
Harrisburg, Pa 17101

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

David M. Kleppinger, Esquire
McNees, Wallace & Nurick, LLP
PO Box 1166
100 Pine Street
Harrisburg, PA 17108

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

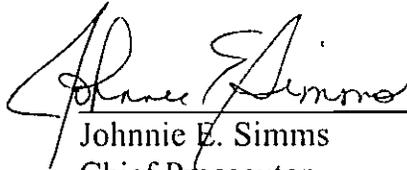
Charles McPhedran
Senior Attorney
PennFuture
1518 Walnut Street
Suite 1100
Philadelphia, PA 19102

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

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

David B. MacGregor, Esquire
Post & Schell PC
Four Penn Center 1600 JFK Blvd
Philadelphia, PA 19103

Michael W. Hassell, Esquire
John H. Isom, Esquire
Post & Schell PC
17 N 2nd Street 12th Floor
Harrisburg, PA 17101-1601



Johnnie E. Simms
Chief Prosecutor
Office of Trial Staff
PA Attorney I.D. #33911

Kenneth L. Mickens
Senior Prosecutor
Office of Trial Staff
PA Attorney I.D. #31255

Charles Daniel Shields
Senior Prosecutor
Office of Trial Staff
PA Attorney I.D. #29363

Dated: April 19, 2007
Docket No. R-00072155



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 24, 2007

HAND DELIVERED

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

ORIGINAL

**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-00072155**

Dear Secretary McNulty:

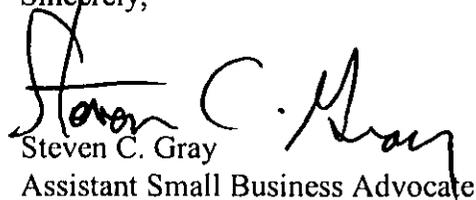
I am delivering for filing today the original plus three copies of the Notice of Appearance, on behalf of the Small Business Advocate, in the above-captioned proceeding.

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

If you have any questions, please do not hesitate to contact me.

DOCUMENT
FOLDER

Sincerely,


Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

BTL

Enclosures

cc: Certificate of Service

Robert D. Knecht

SECRETARY'S BUREAU
2007 APR 24 PM 3:23
REC-1111-110

36

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PPL ELECTRIC UTILITIES CORPORATION

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DOCKET NO. R-00072155

NOTICE OF APPEARANCE

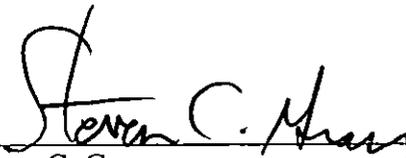
The Office of Small Business Advocate, pursuant to 52 Pa. Code § 1.24, hereby enters the appearance of Steven C. Gray, in the above-captioned proceeding.

Documents in this proceeding should now be served on the following:

Steven C. Gray
Office of Small Business Advocate
300 North Second Street – Suite 1102
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
sgray@state.pa.us

DOCUMENT
FOLDER

DOCKETED
APR 25 2007



Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

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

Dated: April 24, 2007

SECRETARY'S BUREAU
2007 APR 24 PM 3:23
OFFICE OF SMALL BUSINESS ADVOCATE

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation :
Notice of Anticipated Filing of a General : Docket No. R-00072155
Rate Increase :

SECRETARY'S BUREAU

2007 APR 24 PM 3:23

CERTIFICATE OF SERVICE

I certify that I am serving two copies of the Notice of Appearance, on behalf of the Office of Small Business Advocate, by e-mail and first class mail (unless otherwise indicated) upon the persons addressed below:

Hon. Veronica Smith
Chief Administrative Law Judge
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
(717) 787-1191
(717) 787-0481 (fax)
Verosmith@state.pa.us
(E-mail and Hand Delivery)

Paul E. Russell, Esquire
Corporate Counsel
PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101-1179
(610) 774-4254
(610) 774-6726 (fax)
pcrussell@pplweb.com

Charles McPhedran
PennFuture
1518 Walnut Street - #1100
Philadelphia, PA 19102
(215) 545-9692
(215) 545-9637 (fax)
mcphehdran@pennfuture.org

David B. MacGregor, Esquire
Post & Schell, PC
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103-2808
(215) 587-1197
(215) 320-4879 (fax)
dmacgregor@postschell.com

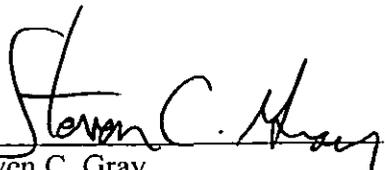
Aron J. Beatty, Esquire
Jennedy E. Santolla, Esquire
Office of Consumer Advocate
555 Walnut Street - Fifth Floor
Harrisburg, PA 17101-1923
(717) 783-5048
(717) 783-7152 (fax)
abeatty@paoca.org
jsantolla@paoca.org
(E-mail and Hand Delivery)

Kenneth L. Mickens, Esquire
Charles Daniel Shields, Esquire
Office of Trial Staff
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105
(717) 787-1976
(717) 772-2677 (fax)
Kmickens@state.pa.us
chshields@state.pa.us
(E-mail and Hand Delivery)

David M. Kleppinger, Esquire
McNees Wallace & Nurick
P. O. Box 1166
100 Pine Street
Harrisburg, PA 17108
(717) 232-8000
(717) 237-5300 (fax)
dkleppin@mwn.com

John H. Isom, Esquire
Michael W. Gang, Esquire
Michael W. Hassell, Esquire
Post & Schell
17 North Second Street - 12th Floor
Harrisburg, PA 17101-1601
(717) 612-6032
(717) 731-1985 (fax)
jisom@postschell.com
mgang@postschell.com
mhassell@postschell.com

April 24, 2007


Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

CERTIFICATE OF SERVICE

SECRETARY'S BUREAU

2007 APR 25 PM 4: 05

2007 APR 25 PM 4: 05

Pennsylvania Public Utility Commission :
 :
v. :
 :
PPL Electric Utilities Corporation :
Base Rate Proceeding :

Docket No. R-00072155

**DOCUMENT
FOLDER**

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate Interrogatories Set I, 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 25th day of April 2007.

SERVICE BY E-MAIL AND INTEROFFICE MAIL

Kenneth L. Mickens, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

SERVICE BY E-MAIL and FIRST CLASS MAIL

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

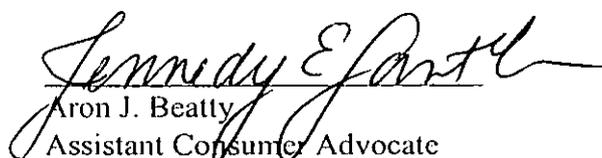
Michael W. Gang, Esquire
Michael W. Hassell, Esquire
John H. Isom, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Counsel for: *PPL Electric Utilities Corporation*

David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103
Counsel for: *PPL Electric Utilities Corporation*

Steven C. Gray
Assistant Small Business Advocate
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101
Counsel for: *Office of Small Business Advocate*

Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace, & Nurick, LLP
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108
Counsel for: *PPL Industrial Customer Alliance*

Charles McPhedran
Senior Attorney
PennFuture
1518 Walnut Street
Suite 1100
Philadelphia, PA 19102
Counsel for: *PennFuture*



Aron J. Beatty
Assistant Consumer Advocate
PA Attorney I.D. # 86625

E-Mail: ABeatty@paoca.org

Jennedy E. Santolla

Assistant Consumer Advocate
PA Attorney I.D. # 203098

E-Mail: JSantolla@paoca.org

Darlene R. Wong

Assistant Consumer Advocate
PA Attorney I.D. # 87381

E-Mail: DWong@paoca.org

Counsel for:

Irwin A. Popowsky
Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152

00093436

CRAIG A. DOLL

ATTORNEY AT LAW
25 WEST SECOND STREET
P.O. Box 403
HUMMELSTOWN, PENNSYLVANIA 17036-0403

HARRISBURG
717/230-9555
FAX 717/566-9901

HUMMELSTOWN
717/566-9000
FAX 717/566-9901
E-MAIL CDOLL76342@AOL.COM

May 1, 2007

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

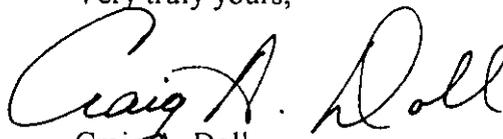
Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corp.
Commission Docket No. R-00072155

Dear Secretary McNulty:

Enclosed for filing is an original and three (3) copies of the Petition for Intervention of Richards energy Group, Inc. in the above captioned proceeding. A copy of this Petition has been served upon those parties set forth in the accompanying Certificate of Service.

If you have any questions, please feel free to contact me.

Very truly yours,


Craig A. Doll

Enclosure

cc: Per Certificate of Service
F. Richards

DOCUMENT
FOLDER

SECRETARIAT BUREAU
2007 MAY -1 PM 2:13

42

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v.

PPL Electric Utilities Corp.

:
:
:
:
:

Docket No. R-00072155

RECEIVED
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SECRETARY'S BUREAU

PETITION TO INTERVENE OF
RICHARDS ENERGY GROUP, INC.

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Richards' Energy Group, Inc. ("Richards"), by and through its undersigned counsel, and, pursuant to the provisions of 52 Pa. Code § 5.71, *et seq.*, files this Petition to Intervene in the above captioned proceeding. In support of this Petition, Richards states as follows:

1. Communications and correspondence concerning this matter should be directed to:

Craig A. Doll, Esquire
25 West Second Street
P.O. Box 403
Hummelstown, PA 17036-0403

(717) 566-9000
(717) 566-9901 fax
CDoll176342@aol.com

with a copy to:

Mr. Frank Richards
Richards Energy Group
3901 Nolt Road, Building #1
Landisville, PA 17538

2. Richards is a licensed electric generation supplier, authorized by this Commission at A-110072 to provide services to commercial, industrial, and institutional customers within the Commonwealth of Pennsylvania.

DOCUMENT
FOLDER

DOCKETED
MAY 07 2007

3. At present within its customer group, Richards provides services to approximately 204 customers who are provided distribution services by PPL Electric Utilities Corporation ("PPL").

4. On or about February 26, 2007, PPL filed a request with the Commission seeking to increase its distribution revenues by approximately \$83.6 million.

5. As part of this filing, PPL has proposed to realign its rate structure, change rules for GS-1 and GS-3 customers who are part of Richards' customer group, and alter the GS-3 rate to become one based purely on a \$ per kwh demand charge. These proposed changes will directly impact Richards' customer group.

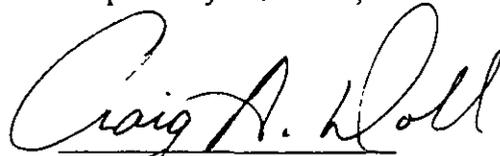
6. Richards submits that through its group members, it has a direct, substantial and immediate interest in insuring that the proposed rate increase and rate realignment is just and reasonable and does not harm the interests of the members of its customer group. Further, as a licensed generation supplier, Richards, in its own right, has a direct, substantial and immediate interest in insuring that the changes proposed by PPL do not harm the competitive environment within the Commonwealth. As such Richards and its customer group have standing to intervene in this proceeding.

7. Even if other customer groups, generation suppliers, or marketers seek intervention in this proceeding, Richards interests and the interests of its customer group is significant and unique. Richards and its customer group's interests will be directly affected by any Commission action in this proceeding. Any order of the Commission will bind Richards and its customer group.

8. Permitting Richards' intervention in this proceeding will not delay any on-going activity in this proceeding nor prejudice any existing party or the public interest. Richards submits that the public interest is best served by permitting this intervention of Richards in this proceeding.

WHEREFORE, Richards Energy Group, Inc. respectfully requests that this Petition be granted and that it be permitted to participate in this proceeding with full party status.

Respectfully submitted,



Craig A. Doll, Esquire
25 West Second Street
P.O. Box 403
Hummelstown, PA 17036-0403

(717) 566-9000
(717) 566-9901 (fax)
CDoll76342@aol.com

Attorney I.D. # 22814

Attorney for Richards Energy Group, Inc.

Dated: May 1, 2007

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-00072155
 :
 PPL Electric Utilities Corp. :

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the petition to Intervene of Richards Energy Group upon the persons listed below via first class mail, postage prepaid in accordance with the provisions of 52 Pa. Code §1.54.

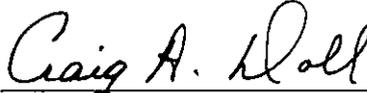
Michael Gang, Esquire
Post & Shell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

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

Office of Consumer Advocate
555 Walnut Street
5th Floor
Harrisburg, PA 17101-1923

Stephen C. Grey, Esquire
Office of Small Business Advocate
1102 Commerce Building
300 North 2nd Street
Harrisburg, PA 17101

PUC Office of Trial Staff
400 North Street
2 West Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265



Craig A. Doll, Esquire
25 West Second Street
P.O. Box 403
Hummelstown, PA 17036-0403

(717) 566-9000
(717) 566-9901 (fax)
Cdoll76342@aol.com

Attorney for Richards Energy Group, Inc.

DATED: May 1, 2007

SECRETARY'S BUREAU
2007 MAY -1 PM 2:14

Paul E. Russell
Associate General Counsel

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



DOCUMENT FOLDER

May 1, 2007

FEDERAL EXPRESS

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

RECEIVED
MAY 01 2007
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. R-00072155**

Dear Mr. McNulty:

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

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

Very truly yours,

Paul E. Russell

Attachment

BTL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

Docket No. R-00072155

CERTIFICATION OF SERVICE

RECEIVED

MAY 01 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via FedEx

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Office of Trial Staff's Interrogatories, Set I, Questions OTS-RE-1-D through OTS-RE-15-D, and Set III, Questions OTS-RE-16-D through OTS-RE-17-D, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

Aron J. Beatty, Esquire
Jennedy E. Santolla, Esquire
Office Of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923

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

Charles Daniel Shield, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 3rd Floor West
Harrisburg, PA 17120

David M. Kleppinger, Esquire
Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace & Nurick
100 Pine Street
Harrisburg, Pennsylvania 17108

Charles McPhedran, Senior Attorney
PennFuture
1518 Walnut Street, Suite 1100
Philadelphia, PA 19102

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

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

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

Dated: May 1, 2007

A handwritten signature in black ink that reads "Paul E. Russell". The signature is written in a cursive style with a horizontal line underneath it.

Paul E. Russell

Paul E. Russell
Associate General Counsel

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



ORIGINAL

May 2, 2007

**DOCUMENT
FOLDER**

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MAY 02 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

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Paul E. Russell
Paul E. Russell

BTL

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. : Docket No. R-00072155
PPL Electric Utilities Corporation :

CERTIFICATION OF SERVICE

Via FedEx

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Office of Trial Staff's Interrogatories, Set II, Questions OTS-RE-18-D through OTS-RE-28-D, and Set IV, Questions OTS-RE-29-D through OTS-RE-33-D, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

Aron J. Beatty, Esquire
Jennedy E. Santolla, Esquire
Office Of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923

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

Charles Daniel Shield, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 3rd Floor West
Harrisburg, PA 17120

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

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

Dated: May 2, 2007



Paul E. Russell

**DOCUMENT
FOLDER**

Paul E. Russell
Associate General Counsel

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



ORIGINAL

May 3, 2007

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MAY 03 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. R-00072155**

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

Very truly yours,

Paul E. Russell

Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. : Docket No. R-00072155
PPL Electric Utilities Corporation :

CERTIFICATION OF SERVICE

Via FedEx

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Office of Trial Staff's Interrogatories, Set V, Questions OTS-RE-29-D through OTS-RE-39-D, and OTS-RE-41-D through OTS-RE-42-D; Set VI, Questions OTS-RE-43-D through OTS-RE-46-D, and OTS-RE-48-D; Set VII, Questions OTS RB-1-D through OTS-RB-3-D; and Set VIII, Questions OTS-RR-1-D through OTS-RR-8-D, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

Aron J. Beatty, Esquire
Jennedy E. Santolla, Esquire
Office Of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923

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

Charles Daniel Shield, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 3rd Floor West
Harrisburg, PA 17120

David M. Kleppinger, Esquire
Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace & Nurick
100 Pine Street
Harrisburg, Pennsylvania 17103

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MAY 03 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Charles McPhedran, Senior Attorney
PennFuture
1518 Walnut Street, Suite 1100
Philadelphia, PA 19102

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

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

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

Dated: May 3, 2007



Paul E. Russell



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

May 3, 2007

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

**DOCUMENT
FOLDER**

RE: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Base Rate Proceeding
Docket No. R-00072155

Dear Mr. Russell:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set II, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

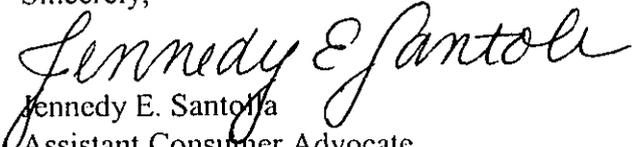
David Parcell
Technical Associates, Inc.
1051 East Cary Street, Suite 601
James Center III
Richmond, VA 23219
E-mail: david.parcell@tai-econ.com

SECRETARY'S BUREAU
2007 MAY -3 PM 4: 06
RECEIVED

Mr. Paul E. Russell
Page 2
May 3, 2007

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary McNulty of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,


Kennedy E. Santola
Assistant Consumer Advocate
PA Attorney I.D. # 203098

Enclosures

cc: All parties of record
James McNulty, Secretary (Certificate of Service Only)
*93728

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-00072155
 :
 PPL Electric Utilities Corporation :
 Base Rate Proceeding :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate Interrogatories Set II, 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 3rd day of May 2007.

SERVICE BY E-MAIL AND INTEROFFICE MAIL

Kenneth L. Mickens, Esquire
Charles D. Shields, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

SERVICE BY E-MAIL and FIRST CLASS MAIL,

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

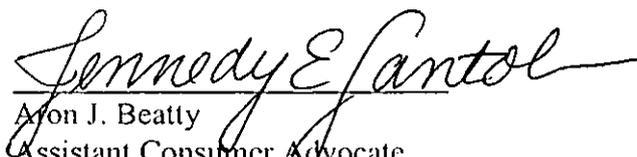
Michael W. Gang, Esquire
Michael W. Hassell, Esquire
John H. Isom, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Counsel for: *PPL Electric Utilities Corporation*

David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103
Counsel for: *PPL Electric Utilities Corporation*

Steven C. Gray
Assistant Small Business Advocate
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101
Counsel for: *Office of Small Business Advocate*

Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace, & Nurick, LLP
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108
Counsel for: *PPL Industrial Customer Alliance*

Charles McPhedran
Senior Attorney
PennFuture
1518 Walnut Street
Suite 1100
Philadelphia, PA 19102
Counsel for: *PennFuture*



Aton J. Beatty
Assistant Consumer Advocate
PA Attorney I.D. # 86625

E-Mail: ABeatty@paoca.org

Jennedy E. Santolla
Assistant Consumer Advocate
PA Attorney I.D. # 203098

E-Mail: JSantolla@paoca.org

Darlene R. Wong
Assistant Consumer Advocate
PA Attorney I.D. # 87381

E-Mail: DWong@paoca.org

Counsel for:
Irwin A. Popowsky
Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
00093436

ORIGINAL

CERTIFICATE OF SERVICE

**DOCUMENT
FOLDER**

Pennsylvania Public Utility Commission :
:
v. :
:
PPL Electric Utilities Corporation :
Base Rate Proceeding :

Docket No. R-00072155

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate Interrogatories Set III, 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 4th day of May 2007.

SERVICE BY E-MAIL AND INTEROFFICE MAIL

Kenneth L. Mickens, Esquire
Charles D. Shields, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

RECEIVED
2007 MAY -4 PM 3:57
SECRETARY'S BUREAU

SERVICE BY E-MAIL and FIRST CLASS MAIL,

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

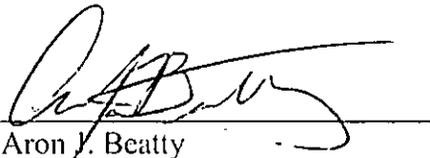
Michael W. Gang, Esquire
Michael W. Hassell, Esquire
John H. Isom, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Counsel for: *PPL Electric Utilities Corporation*

David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103
Counsel for: *PPL Electric Utilities Corporation*

Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace, & Nurick, LLP
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108
Counsel for: *PPL Industrial Customer Alliance*

Steven C. Gray
Assistant Small Business Advocate
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101
Counsel for: *Office of Small Business Advocate*

Charles McPhedran
Senior Attorney
PennFuture
1518 Walnut Street
Suite 1100
Philadelphia, PA 19102
Counsel for: *PennFuture*



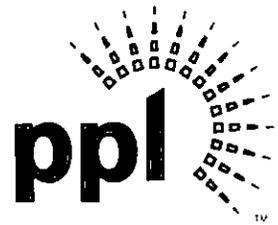
Aron J. Beatty
Assistant Consumer Advocate
PA Attorney I.D. # 86625
E-Mail: ABeatty@paoca.org
Jennedy E. Santolla
Assistant Consumer Advocate
PA Attorney I.D. # 203098
E-Mail: JSantolla@paoca.org
Darlene R. Wong
Assistant Consumer Advocate
PA Attorney I.D. # 87381
E-Mail: DWong@paoca.org

Counsel for:
Irwin A. Popowsky
Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
00093436

**DOCUMENT
FOLDER**

Paul E. Russell
Associate General Counsel

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



May 7, 2007

FEDERAL EXPRESS

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

RECEIVED
MAY 07 2007
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Pennsylvania Public Utility Commission
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PPL Electric Utilities Corporation
Docket No. R-00072155**

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

Very truly yours,

Paul E. Russell

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. : Docket No. R-00072155
PPL Electric Utilities Corporation :

CERTIFICATION OF SERVICE

Via FedEx

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Office of Trial Staff's Interrogatories, Set IX, Questions OTS-RE-49-D through OTS-RE-58-D, and Set X, Questions OTS-RE-59-D through OTS-RE-69-D, as well as supplemental responses to Set VIII, Questions OTS-RR-3-D and OTS-RR-4-D, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

Aron J. Beatty, Esquire
Jennedy E. Santolla, Esquire
Office Of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923

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

Charles Daniel Shield, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
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Harrisburg, Pennsylvania 17108

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PA PUBLIC UTILITY COMMISSION
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Charles McPhedran, Senior Attorney
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Eugene M. Brady
Commission on Economic Opportunity
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Stephen J. Baron, President
J. Kennedy and Associates, Inc.
570 Colonial Park Drive
Suite 305
Roswell, GA 30075

Dated: May 7, 2007

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

Paul E. Russell

COMMONWEALTH OF PENNSYLVANIA

DATE: May 7, 2007

SUBJECT: R-00072155

TO: Office of Trial Staff

FROM: *KB* James J. McNulty, Secretary

Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corp

Attached is a copy of a Petition to Intervene, filed by Richards Energy Group, Inc. in connection with the above docketed proceeding.

This matter is assigned to your Office for appropriate action.

Attachment

cc: FUS
ALJ

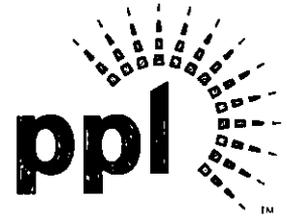
ksb

DOCUMENT
FOLDER

DOCKETED
MAY 07 2007

Paul Russell
Associate General Counsel

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



**DOCUMENT
FOLDER**

May 8, 2007

RECEIVED

MAY 08 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

FEDERAL EXPRESS

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

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Pennsylvania Public Utility Commission :
v. : Docket No. R-00072155
PPL Electric Utilities Corporation :

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SECRETARY'S BUREAU

Via FedEx

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Office of Trial Staff's Interrogatories, Set XI, Questions OTS-RE-70-D through OTS-RE-76-D, and Set XII, Questions OTS-RE-77-D through OTS-RE-91-D, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

Aron J. Beatty, Esquire
Jennedy E. Santolla, Esquire
Office Of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, Pennsylvania 17101-1923

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

Charles Daniel Shield, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 3rd Floor West
Harrisburg, PA 17120

David M. Kleppinger, Esquire
Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace & Nurick
100 Pine Street
Harrisburg, Pennsylvania 17108

Charles McPhedran, Senior Attorney
PennFuture
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Philadelphia, PA 19102

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

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

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

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

David Parcell
Technical Associates, Inc.
1051 East Cary Street, Suite 601
James Center III
Richmond, VA 23219

Lafayette Morgan
Exeter Associates, Inc.
Suite 310
5565 Sterrett Place
Columbia, MD 21044

Dated: May 8, 2007



Paul E. Russell



DOCUMENT
FOLDER

McNees Wallace & Nurick LLC
attorneys at law

VASILIKI KARANDRIKAS
DIRECT DIAL: (717) 237-5274
E-MAIL ADDRESS: VKARANDRIKAS@MWN.COM

May 9, 2007

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

VIA E-MAIL AND FIRST CLASS MAIL

**RE: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation;
Docket No. R-00072155**

Dear Mr. Russell:

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

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

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

Very truly yours,

McNEES WALLACE & NURICK LLC

By *Vasiliki Karandrikas*
Pamela C. Polacek
Vasiliki Karandrikas

Counsel to the PP&L Industrial Customer Alliance

VK
Enclosures

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

SECRET
2007 MAY 14 AM 8:29
REC'D

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).

VIA FIRST CLASS MAIL

Aron J. Beatty, Esquire
Jennedy E. Santolla
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Kenneth L. Mickens, Esquire
Charles Daniel Shields, Esquire
Office of Trial Staff
PA Public Utility Commission
Commonwealth Keystone Building
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PennFuture
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Paul E. Russell, Esquire
PPL Services Corporation
Two North Ninth Street
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Steven C. Gray, Esquire
Office of Small Business Advocate
Commerce Building, Suite 1102
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Harrisburg, PA 17101

David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103

Michael W. Gang, Esquire
Michael W. Hassell, Esquire
John H. Isom, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

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

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

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

Vasiliki Karandrikas
Vasiliki Karandrikas, Esquire

Dated: May 9, 2007

SECRET

2007 MAY 14 AM 8:29

FILE

Paul Russell
Associate General Counsel

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



DOCUMENT FOLDER

May 9, 2007

FEDERAL EXPRESS

ORIGINAL

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

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. R-00072155**

Dear Mr. McNulty:

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

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

Very truly yours,

Paul E. Russell

Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

Docket No. R-00072155

CERTIFICATION OF SERVICE

ORIGINAL

Via FedEx

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Office of Consumer Advocate's Interrogatories, Set I, Questions 1 through 12, Questions 14 through 43, and Questions 45 through 59, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

Aron J. Beatty, Esquire
Jennedy E. Santolla, Esquire
Office Of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
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Steven Gray, Esquire
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Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Charles Daniel Shield, Esquire
Office Of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 3rd Floor West
Harrisburg, PA 17120

David M. Kleppinger, Esquire
Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace & Nurick
100 Pine Street
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Charles McPhedran, Senior Attorney
PennFuture
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Philadelphia, PA 19102

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

Eugene M. Brady
Commission on Economic Opportunity
165 Amber Lane
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Stephen J. Baron, President
J. Kennedy and Associates, Inc.
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Suite 305
Roswell, GA 30075

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

David Parcell
Technical Associates, Inc.
1051 East Cary Street, Suite 601
James Center III
Richmond, VA 23219

Lafayette Morgan
Exeter Associates, Inc.
Suite 310
5565 Sterrett Place
Columbia, MD 21044

Dated: May 9, 2007



Paul E. Russell



OFFICE OF CONSUMER ADVOCATE

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

IRWIN A. POPOWSKY
Consumer Advocate

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

May 9, 2007

DOCUMENT
FOLDER

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

RE: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Base Rate Proceeding
Docket No. R-00072155

Dear Mr. Russell:

Enclosed you will find two copies of the Office of Consumer Advocate's Interrogatories, Set IV, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) days of service. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Richard Galligan
Exeter Associates, Inc.
Suite 310
5565 Sterrett Place
Columbia, MD. 21044
(410) 992-7500
E-mails: rgalligan@exeterassociates.com

SECRETARY'S BUREAU
2007 MAY -9 PM 3:59

Mr. Paul E. Russell

Page 2

May 9, 2007

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary McNulty of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,



Aron J. Beatty

Assistant Consumer Advocate

PA Attorney I.D. # 86625

Enclosures

cc: All parties of record

93914 **JAMES McNULTY / CERTIFICATE ONLY**

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-00072155
	:	
PPL Electric Utilities Corporation	:	
Base Rate Proceeding	:	

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate Interrogatories Set IV, 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 9th day of May 2007.

SERVICE BY E-MAIL AND INTEROFFICE MAIL

Kenneth L. Mickens, Esquire
 Charles D. Shields, Esquire
 Office of Trial Staff
 Pennsylvania Public Utility Commission
 Commonwealth Keystone Building
 400 North Street
 Harrisburg, PA 17105-3265

SECRETARY'S BUREAU

2007 MAY -9 PM 3: 59

SERVICE BY E-MAIL and FIRST CLASS MAIL

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

Michael W. Gang, Esquire
 Michael W. Hassell, Esquire
 John H. Isom, Esquire
 Post & Schell, P.C.
 17 North Second Street
 12th Floor
 Harrisburg, PA 17101-1601
 Counsel for: *PPL Electric Utilities Corporation*

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Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103
Counsel for: *PPL Electric Utilities Corporation*

Steven C. Gray
Assistant Small Business Advocate
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101
Counsel for: *Office of Small Business Advocate*

Craig A. Doll, Esquire
25 West Second Street
P.O. Box 403
Hummelstown, PA 17036-0403
Counsel for: *Richards' Energy Group*



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E-Mail: ABeatty@paoca.org
Jennedy E. Santolla
Assistant Consumer Advocate
PA Attorney I.D. # 203098
E-Mail: JSantolla@paoca.org
Darlene R. Wong
Assistant Consumer Advocate
PA Attorney I.D. # 87381
E-Mail: DWong@paoca.org

Counsel for:
Irwin A. Popowsky
Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152

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Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace, & Nurick, LLP
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108
Counsel for: *PPL Industrial Customer Alliance*

Charles McPhedran
Senior Attorney
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1518 Walnut Street
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Counsel for: *PennFuture*

Mr. Frank Richards
Richards Energy Group
3901 Nolt Road, Building #1
Landisville, PA 17538

SECRETARY'S BUREAU

2007 MAY -9 PM 3:59



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perussell@pplweb.com



May 10, 2007

FEDERAL EXPRESS

**DOCUMENT
FOLDER**

RECEIVED

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

MAY 10 2007

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. R-00072155**

Dear Mr. McNulty:

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

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

Very truly yours,

Paul E. Russell/dlw

Paul E. Russell

Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. : Docket No. R-00072155
PPL Electric Utilities Corporation :

RECEIVED

MAY 10 2007

CERTIFICATION OF SERVICE

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via FedEx

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Office of Trial Staff's Interrogatories, Set XIII, Questions OTS-RE-92-D through OTS-RE-132-D; Set XIV, Questions OTS-RB-4-D through OTS-RB-7-D; and Set XV, Questions OTS-RE-133-D through OTS-RE-136-D, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

Aron J. Beatty, Esquire
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Charles Daniel Shield, Esquire
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Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace & Nurick
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Richmond, VA 23219

Lafayette Morgan
Exeter Associates, Inc.
Suite 310
5565 Sterrett Place
Columbia, MD 21044

Dated: May 10, 2007


Paul E. Russell