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Morgan Lewis  
COUNSELORS AT LAW

John H. Isom  
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April 26, 2004

**VIA HAND DELIVERY**

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

**Re: PAPUC, et al. v. PPL Electric Utilities Corporation**  
**Docket No. R-00049255C0001**

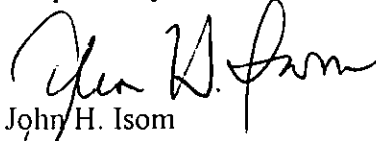
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of the Pennsylvania Public Utility Commission, United States Department of Defense and other affected Federal Executive Agencies in the above-referenced proceeding.

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

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

Respectfully submitted,

  
John H. Isom

JHI/ss  
Enclosures  
cc: Certificate of Service

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2004 APR 26 PM 4:03  
PAPUC  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, :  
United States Department of Defense :  
and the Federal Executive Agencies :  
: Docket No. R-00049255C001  
v. :  
: :  
PPL Electric Utilities Corporation :

**ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

**I.**

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the United States Department of Defense and other affected Federal Executive Agencies ("DOD")

**II.**

The averments of Paragraph II of the Complaint are admitted.

**III.**

The averments of Paragraph III of the Complaint are admitted.

**IV.**

In response to Paragraph IV of the Complaint, it is admitted that the DOD is a customer of PPL Electric in a number of locations. It is admitted further that PPL Electric has proposed increases and rates designed to produce an increase of \$164.4 million in annual operating revenues from distribution rates and a pass through of \$57.2 million in charges

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that PPL Electric pays for transmission services that it purchases under tariffs regulated by the Federal Energy Regulatory Commission.

**V.**

In response to Paragraph V of the Complaint, it is admitted that the DOD is a customer of PPL Electric in a number of locations. PPL Electric's customer service records do not permit it to identify readily all locations at which DOD is a customer of PPL Electric. It is admitted, however, that, in total, the DOD at its several locations in combination, is a significant customer with PPL Electric.

**VI.**

In response to the averments of Paragraph No. VI, without addressing each of the individual averments, some of which are highly subjective in nature, PPL Electric does not object to participation by the DOD in the above-captioned proceeding.

**VII.**

The averments of Paragraph No. VII in the Complaint constitute speculation about issues that the DOD may choose to raise during the course of the proceeding. Contrary to the DOD's averments, however, PPL Electric has fully supported its proposed increase in rates in the testimony and exhibits in filing. Nevertheless, as indicated previously, PPL Electric does not oppose participation by DOD in the above-captioned proceeding.

**VIII.**

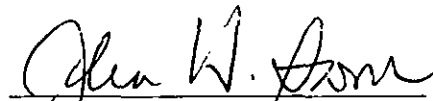
The averments of Paragraph No. VIII of the Complaint contain DOD's preliminary observations concerning rate structure and rate design. DOD identifies certain issues which it may choose to pursue during the course of the above-captioned proceeding.

Contrary to the DOD's averments, PPL Electric has fully justified its proposed rates in the testimony and exhibits in the filing, including its proposed rate structure and rate design. As indicated previously, however, PPL Electric does not oppose DOD's participation in the proceeding.

In the remaining averments of Paragraph No. VIII of the Complaint, DOD identifies witnesses that it may call during the course of the proceeding. No response to the DOD's identification of potential witnesses is required at this time.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Complaint of the Department of Defense and the Federal Executive Agencies be denied. PPL Electric Utilities Corporation, however, does not oppose participation by the Department of Defense and the Federal Executive Agencies in the proceeding.

Respectfully submitted,



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E-mail: perussell@pplweb.com

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: April 26, 2004

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to the Complaint of the Department of Defense and Federal Executive Agencies upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

Tanya J. McCloskey, Esquire  
James A. Mullins, Esquire  
Lori A. Herman, Esquire  
Aron J. Beatty, Esquire  
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Office of The Judge Advocate General  
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Honorable Allison K. Turner  
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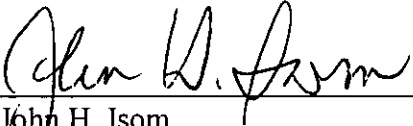
Joseph L. Vullo, Esquire  
Attorney at Law  
1460 Wyoming Avenue  
Forty Fort, PA 18704

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PAPUC  
SECRETARY'S BUREAU

**Re: PAPUC, et al. v. PPL Electric Utilities Corporation**  
**Docket No. R-00049255C0002**

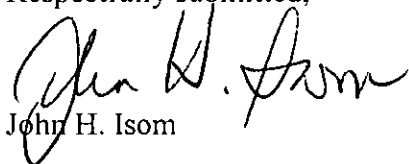
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of the Pennsylvania Public Utility Commission and the PP&L Industrial Customer Alliance in the above-referenced proceeding.

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

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

Respectfully submitted,

  
John H. Isom

JHI/ss  
Enclosures  
cc: Certificate of Service

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
and the PP&L Industrial Customer :  
Alliance :

Docket No. R-00049255C00002

v. :

PPL Electric Utilities Corporation :

SECRETARY'S BUREAU  
PA PUC

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**ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the PP&L Industrial Customer Alliance ("PPLICA").

1. Information concerning the membership of PPLICA is not reasonably available to PPL Electric, and therefore, PPLICA's averments concerning its membership are denied. Strict proof thereof is demanded at hearing, if relevant.

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

3. The averments of Paragraph No. 3 of the Complaint are admitted.

4. The averments of Paragraph No. 4 of the Complaint purport to be a summary of PPL Electric's proposed increase in base rates, which was submitted to the Commission, together with supporting testimony and exhibits, on March 29, 2004. Therein, PPL Electric has made many proposals. PPL Electric's rate filing speaks for itself, and therefore, PPLICA's characterizations of it are denied.

5. The averments of Paragraph No. 5 of the Complaint are statements of PPLICA's subjective intent in this proceeding. As such, it is not an averment of fact, and no response is required.

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6. The averments of Paragraph No. 6 of the Complaint describe the members of PPLICA and services received by members of PPLICA from PPL Electric. Until PPLICA's membership is finalized, however, PPL Electric cannot confirm the accuracy of PPLICA's averments, and therefore, such averments are denied. By way of further response, however, PPL Electric does not object to PPLICA's participation in the above-captioned proceeding.

7. The averments of Paragraph No. 7 of the Complaint are denied. To the contrary, the exhibits and testimony filed by PPL Electric in support of its proposed increase in base rates fully justify the proposed increase. PPL Electric's proposed rates are just, reasonable, and unreasonably discriminatory and fully comply with all applicable provisions of the Public Utility Code and opinions of the appellate courts of Pennsylvania interpreting the Public Utility Code.

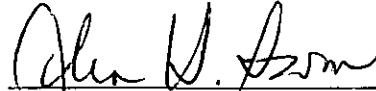
8. The averments of Paragraph No. 8 of the Complaint are conclusions of law, to which no response is required.

9. The averments of Paragraph No. 9 of the Complaint contain PPLICA's opinions with regard to subjects which the Commissions should investigate in this proceeding. It is denied that investigation of the subjects listed by PPLICA is necessary or appropriate. To the contrary, testimony and exhibits filed by PPL Electric fully support the proposed increase in base rates.

10. The averments of Paragraph No. 10 of the Complaint are requests for relief to which no response is required. By way of further response, however, PPL Electric does not object to PPLICA's participation in the above-captioned proceeding.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of the PP&L Industrial Customer Alliance be denied.

Respectfully submitted,



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Attorneys for PPL Electric  
Utilities Corporation

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: April 26, 2004



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of PP&L Industrial Customer Alliance, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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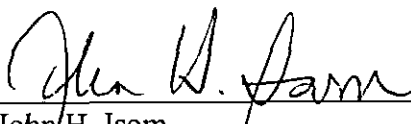
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Philadelphia, PA 19101-8699

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\_\_\_\_\_  
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**VIA HAND DELIVERY**

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Harrisburg, PA 17120

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**Re: PAPUC, et al. v. PPL Electric Utilities Corporation  
Docket No. R-00049255C0003**

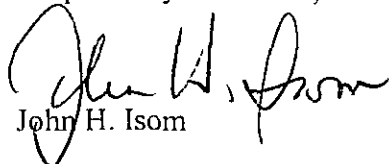
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of the Pennsylvania Public Utility Commission and William R. Lloyd, Jr., Small Business Advocate, in the above-referenced proceeding.

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

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

Respectfully submitted,

  
John H. Isom

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JHI/ss

Enclosures

cc: Certificate of Service

194

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
and William R. Lloyd, Jr., Small Business :  
Advocate :  
:  
v. :  
:  
PPL Electric Utilities Corporation :

Docket No. R-00049255C0003

SECRETARY'S BUREAU  
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**ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned *Complaint of William R. Lloyd, Jr., Small Business Advocate*.

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted.
3. The averments of Paragraph No. 3 of the Complaint are admitted.
4. The averments of Paragraph No. 4 of the Complaint are conclusions of law to which no response is required.
5. The averments of Paragraph No. 5 of the Complaint are admitted. By way of further response, it is noted that, of the proposed increase in annual operating revenues of \$221.6 million, approximately \$57.2 million is a pass-through of charges that PPL Electric pays for transmission services that it purchases under tariffs regulated by the Federal Energy Regulatory Commission.
6. In response to Paragraph No. 6 of the Complaint, it is admitted that PPL Electric is requesting a return on its common equity of 11.5 percent.

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7. In response to Paragraph No. 7 of the Complaint, it is admitted that, under PPL Electric's proposed rate increase, a commercial customer using 1,000 kW hours per month with the maximum demand of 3 kW would experience increases in its monthly bill of approximately 9.5 percent.

8. The averments of Paragraph No. 8 of the Complaint are denied. To the contrary, the testimony and exhibits filed by PPL Electric in support of its proposed increase in base rates fully support the proposed rate increase. PPL Electric's proposed rates are just, reasonable, not unreasonably discriminatory and comply with all applicable provisions of the Public Utility Code and opinions of the Pennsylvania appellate courts interpreting the Public Utility Code.

9. The averments of Paragraph No. 9 of the Complaint are denied. To the contrary, PPL Electric's proposed increase in rates will provide PPL Electric only with a reasonable opportunity to earn a fair rate of return.

10. The averments of Paragraph No. 10 of the Complaint are denied. To the contrary, PPL Electric's proposed increase in rates, is just, reasonable, not unreasonably discriminatory and complies fully with all applicable provisions of the Public Utility Code and opinions of the Pennsylvania appellate courts interpreting the Public Utility Code. Further, PPL Electric's proposed increase in rates is based upon sound public policy and ratemaking principles.

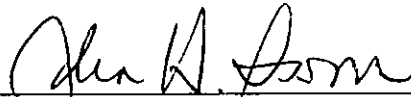
11. The averments of Paragraph No. 11 are denied. To the contrary, PPL Electric's proposed Distribution System Improvement Charge is lawful and consistent with sound public policy and ratemaking principles.

12. The averments of Paragraph No. 12 are denied. To the contrary, the testimony and exhibits submitted by PPL Electric in support of its proposed increase in rates meets all of the requirements of the Public Utility Code and all applicable regulations of the Pennsylvania Public Utility Commission. Further, the testimony and exhibits submitted by PPL Electric fully support the proposed increase in rates.

13. Paragraph No. 13 of the Complaint is a request for relief, to which no response is required.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Complaint of William R. Lloyd, Jr., Small Business Advocate, be denied.

Respectfully submitted,



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Attorneys for PPL Electric  
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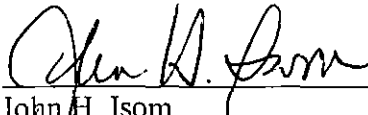
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**Re: PAPUC, et al. v. PPL Electric Utilities Corporation  
Docket No. R-00049255C0004**

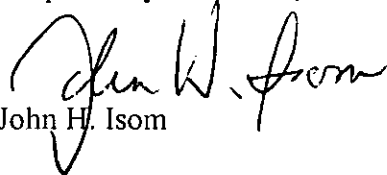
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Respectfully submitted,

  
John H. Isom

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JHI/ss

Enclosures

cc: Certificate of Service

175

the Federal Energy Regulatory Commission. It is admitted that the proposed increase in rates will become effective on January 1, 2005.

B. The averments of Paragraph No. 3.B. of the Complaint are denied as stated. It is admitted that PPL Electric furnishes electric public utility service as an electric distribution company to approximately 1.3 million customers in all or portions of 29 counties in central and eastern Pennsylvania.

C. Paragraph 3.C. of the Complaint summarizes, from OCA's perspective, PPL Electric's proposals concerning the residential rate class. PPL Electric's proposals are contained in its proposed tariff and are explained in exhibits and written testimony submitted in support of the proposed increase in rates. These materials speak for themselves, and therefore, OCA's characterizations of PPL Electric's proposals are denied.

D. The averments of Paragraph No. 3.D. of the Complaint are admitted.

E. The averments of Paragraph No. 3.E. of the Complaint are admitted.

F. In response to Paragraph 3.F. of the Complaint, it is admitted that PPL Electric has proposed the Distribution System Improvement Charge ("DSIC") which generally would permit PPL Electric to recover costs associated with distribution system upgrades, subject to certain limitations, between base rate proceedings through a surcharge mechanism. By way of further response, testimony and exhibits setting forth and explaining PPL Electric's DSIC proposal are incorporated herein by reference.

G. The averments of Paragraph 3.G. of the Complaint are conclusions of law to which no response is required.

H. The averments of Paragraph 3.H. of the Complaint are denied. To the contrary, PPL Electric's proposed increase in rates, and other tariff changes are just, reasonable, and comply fully with all applicable provisions of the Public Utility Code and opinions of the Pennsylvania appellate courts interpreting the Public Utility Code. The proposed increase in rates will merely provide to PPL Electric a reasonable opportunity to achieve a fair rate of return.

I. The averments of Paragraph 3.I. of the Complaint are denied. To the contrary, PPL Electric's proposed rates are not unreasonably discriminatory and comply fully with all applicable provisions of the Public Utility Code and opinions of the Pennsylvania appellate courts interpreting the Public Utility Code. Further, PPL Electric's proposed rates are consistent with sound public policy and ratemaking principles.

J. The averments of Paragraph 3.J. of the Complaint are denied. To the contrary, PPL Electric's proposed DSIC is just, reasonable, and complies fully with all applicable provisions of the Public Utility Code and opinions of the Pennsylvania appellate courts interpreting the Public Utility Code. Further, the DSIC is consistent with sound public policy and ratemaking principles.

K. The averments of Paragraph 3.K. of the Complaint are denied. To the contrary, PPL Electric's proposed Transmission Service Charge ("TSC") is fair, equitable, and will not harm customers. In fact, the TSC provides only for recovery by PPL Electric of its actual transmission costs, which are incurred under rates regulated by the Federal Energy Regulatory Commission.

L. Subparagraph 3.L. of the Complaint is a statement of OCA's subjective intent in this proceeding. As such, it is not an averment of fact, and therefore, no response is required.

M. The averments of Paragraph No. 3.M. of the Complaint are denied. To the contrary, PPL Electric's existing and proposed rates, rules and regulations are just, reasonable and comply fully with all applicable provisions of the Public Utility Code and are consistent with sound public policy and ratemaking principles.

N. The averments of Paragraph 3.N. of the Complaint are statements of OCA's subjective intent in this proceeding. As such, they are not averments of fact, and therefore, no response is required.

4. The averments of Paragraph No. 4 of the Complaint are requests for relief to which no response is required.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Complaint of Irwin A. Popowski, Consumer Advocate, be denied.

Respectfully submitted,



David B. MacGregor  
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1701 Market Street  
Philadelphia, PA 19103-2921  
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Paul E. Russell  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
Two North Ninth Street  
Allentown, PA 18101-1179  
Voice: 610.774.4254  
Fax: 610.774.6726  
E-mail: perussell@pplweb.com

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: April 26, 2004

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to the Complaint of Irwin A. Popowski, Consumer Advocate, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

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

Richard A. Kanaskie, Esquire  
Office of Trial Staff  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

David M. Kleppinger, Esquire  
Pamela C. Polacek, Esquire  
Karen S. Miller, Esquire  
McNees Wallace & Nurick  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 71108

David A. McCormick, Esquire  
Department of the Army  
Office of The Judge Advocate General  
901 North Stuart Street  
Arlington, VA 22203-1837

Stephen J. Baron, President  
J. Kennedy & Associates Inc.  
570 Colonial Park Drive, Suite 205  
Roswell, GA 30075-3770

Scott J. Rubin, Esquire  
3 Lost Creek Drive  
Selinsgrove, PA 17870-9357  
Honorable Allison K. Turner  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Philadelphia State Office Building  
1400 West Spring Garden St., Rm. 1302  
Philadelphia, PA 19130

Eric Joseph Epstein  
4100 Hillsdale Road  
Harrisburg, PA 17112

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

PA PUBLIC  
SECRETARY'S BUREAU

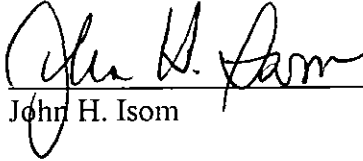
2004 APR 26 PM 4: 05

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

Kent D. Murphy, Esquire  
Legal Department  
Exelon Business Services Company  
2301 Market Street/23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699

Date: April 26, 2004

  
\_\_\_\_\_  
John H. Isom

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
and Irwin A. Popowski, Consumer :  
Advocate :  
 : Docket No. R-00049255C0004  
v. :  
 :  
PPL Electric Utilities Corporation :

**ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of Irwin A. Popowski, Consumer Advocate ("OCA").

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted.
3. PPL Electric answers each of the separately designated subparagraphs of Paragraph No. 3 as follows:

A. The averments of Paragraph No. 3.A. of the Complaint are denied as stated. It is admitted that on March 29, 2004, PPL Electric filed Supplement No. 38 to Tariff – Electric Pa. P.U.C. No. 201, together with supporting exhibits and testimony. Therein, PPL Electric proposed increases in rates designed to produce \$221.6 million in additional annual operating revenues, an average increase of 8.14%. The proposed increase in rates includes an increase in \$164.4 million in distribution revenues and a pass through of \$57.2 million in charges that PPL Electric pays for transmission services that it purchases under tariffs regulated by

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APR 30 2004

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

ORIGINAL

Morgan Lewis  
COUNSELORS AT LAW

John H. Isom  
717.237.4022  
jisom@morganlewis.com

July 7, 2004

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

DOCUMENT  
FOLDER

SECRETARY'S BUREAU

2004 JUL -7 PM 4: 23

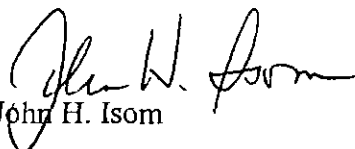
RECEIVED

**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation  
Docket No. R-00049255C0005**

Dear Secretary McNulty:

Enclosed, are three copies of the Answer to Complaint of Anthony A. Graziano which was previously filed under Docket No. C-20043011. We are refileing the Answer to Complaint at the above docket number to insure that the Commission's file is complete. As indicated on the enclosed Certificate of Service, copies have been served on Mr. Graziano.

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosure

c: Certificate of Service

**ORIGINAL**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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JUL 16 AM 10:00  
SECRETARY'S BUREAU

Anthony A. Graziano :  
:  
v. :  
:  
PPL Electric Utilities Corporation :

Docket No. ~~C-20043011~~  
R-0004925560005

**ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Anthony A. Graziano. Before addressing Mr. Graziano's specific averments, however, PPL Electric notes that Mr. Graziano's Complaint has been assigned a Complaint Docket number. The complaint, however, deals with PPL Electric's proposed increase in base rates, which has been docketed at R-00049255. PPL Electric respectfully suggests that this Complaint should be redocketed as a complaint against PPL Electric's proposed increase in rates and consolidated with that proceeding. PPL Electric answers the averments of Mr. Graziano's Complaint as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted.
3. The averments of Paragraph No. 3 of the Complaint are denied.

Information concerning the personal financial circumstances of Mr. Graziano is not reasonably available to PPL Electric, and therefore, such averments are denied. Further, PPL Electric's proposed increase in rates is just and reasonable, fully supported by the future test year data in compliance with the Public Utility Code, in compliance with applicable decisions of the Pennsylvania Public Utility Commission ("Commission") and

**DOCKETED**  
JUL 14 2004

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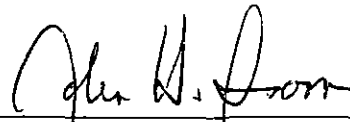
the Pennsylvania appellate courts and in compliance with sound ratemaking principles.

By way of further answer, PPL Electric's retail rates have remained essentially unchanged for almost two decades. However, costs of providing service have continued to increase over this period of time and PPL Electric currently is earning a return on equity of less than 2%. For a further explanation of the reasons for the proposed increase in rates, please see PPL Electric Exhibit Future 1, Statement of Reasons.

4. The averments of Paragraph No. 4 of the Complaint are requests for relief, to which no response is required. By way of further response, however, the averments in Paragraph No. 3 of this Answer are incorporated in by reference.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Complaint of Anthony J. Graziano be denied.

Respectfully submitted,



David B. MacGregor  
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Michael W. Gang  
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Fax: 610.774.6726  
E-mail: perussell@pplweb.com

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: June 16, 2004

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

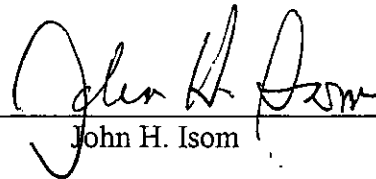
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Anthony A Graziano, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

Anthony J. Graziano  
640 Westwood Lane  
Frackville, PA 17931

Date: June 16, 2004

  
\_\_\_\_\_  
John H. Isom

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Anthony A. Graziano, upon the participant(s), listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

**VIA FIRST CLASS MAIL**

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

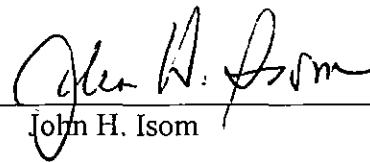
Anthony J. Graziano  
640 Westwood Lane  
Frackville, PA 17931

SECRETARY'S BUREAU

2004 JUL -7 PM 4: 23

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Date: July 7, 2004

  
John H. Isom

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

**Morgan Lewis**  
COUNSELORS AT LAW

ORIGINAL

**John H. Isom**  
717.237.4022  
jisom@morganlewis.com

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SECRETARY'S BUREAU

July 7, 2004

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

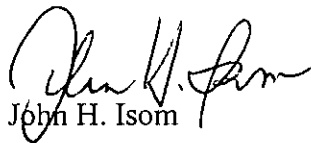
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FOLDER

**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation  
Docket No. R-00049255C0006**

Dear Secretary McNulty:

Enclosed, are three copies of the Answer to Complaint of Brenda Hoover which was previously filed under Docket No. C-20042985. We are refileing the Answer to Complaint at the above docket number to insure that the Commission's file is complete. As indicated on the enclosed Certificate of Service, copies have been served on Ms. Hoover.

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosure

c: Certificate of Service

**ORIGINAL**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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2004 JUL -7 PM 4:25  
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Brenda Hoover :  
:  
v. :  
:  
PPL Electric Utilities Corporation :

Docket No: C-20042985  
R-00049255C0006

**ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Brenda Hoover. Before addressing her averments, however, PPL Electric notes that Ms. Hoover's Complaint has been assigned a Complaint Docket No. The complaint deals with PPL Electric's proposed increase in base rates, which has been docketed at R-00049255. PPL Electric respectfully suggests that this Complaint should be redocketed as a complaint against PPL Electric's proposed increase in rates and consolidated with that proceeding. PPL Electric answers each of the averments of Ms. Hoover's Complaint as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted.
3. The averments of Paragraph No. 3 of the Complaint are denied.

Information concerning the personal financial circumstances of Ms. Hoover is not reasonably available to PPL Electric, and therefore, such averments are denied. Further, PPL Electric's proposed increase in rates is just and reasonable, fully supported by the future test year data in compliance with the Public Utility Code, in compliance with applicable decisions of the Pennsylvania Public Utility Commission ("Commission") and

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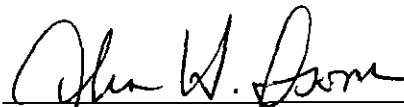
the Pennsylvania appellate courts and in compliance with sound ratemaking principles.

By way of further answer, PPL Electric's retail rates have remained essentially unchanged for almost two decades. However, costs of providing service have continued to increase over this period of time and PPL Electric currently is earning a return on equity of less than 2 percent. For a further explanation of the reasons for the proposed increase in rates, please see PPL Electric Exhibit Future 1, Statement of Reasons.

4. The averments of Paragraph No. 4 of the Complaint are requests for relief, to which no response is required. By way of further response, however, the averments in Paragraph No. 3 of this Answer are incorporated in by reference.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Complaint of Brenda Hoover be denied.

Respectfully submitted,



David B. MacGregor  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Voice: 215.963.5448  
Fax: 215.963.5001  
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Michael W. Gang  
John H. Isom  
Morgan, Lewis & Bockius LLP  
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jisom@morganlewis.com

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

Of Counsel:

Attorneys for PPL Electric  
Utilities Corporation

Morgan, Lewis & Bockius LLP

Date: June 16, 2004



**CERTIFICATE OF SERVICE**

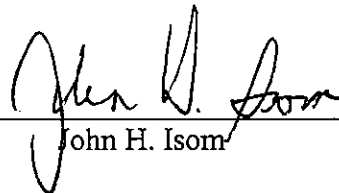
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Brenda Hoover, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

Brenda Hoover  
630 N. Jefferson Street  
Allentown, PA 18102

Date: June 16, 2004

  
\_\_\_\_\_  
John H. Isom

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Brenda Hoover, upon the participant(s), listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

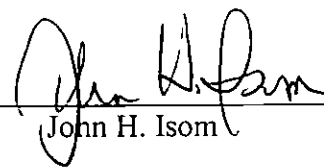
**VIA FIRST CLASS MAIL**

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

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SECRETARY'S BUREAU

Brenda Hoover  
630 N. Jefferson Street  
Allentown, PA 18102

Date: July 7, 2004

  
\_\_\_\_\_  
John H. Isom

Morgan, Lewis & Bockius LLP  
One Commerce Square  
417 Walnut Street  
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ORIGINAL

Morgan Lewis  
COUNSELORS AT LAW

John H. Isom  
717.237.4022  
jisom@morganlewis.com

April 26, 2004

**VIA HAND DELIVERY**

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

**Re: PAPUC, et al. v. PPL Electric Utilities Corporation**  
**Docket No. R-00049255** ~~C-00017~~

Dear Secretary McNulty:

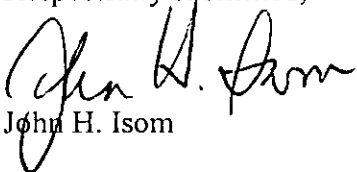
C 00017

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of the Pennsylvania Public Utility Commission and Eric Joseph Epstein, in the above-referenced proceeding.

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

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

Respectfully submitted,

  
John H. Isom

JHI/ss

Enclosures

cc: Certificate of Service

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F.A.P.U.C.  
SECRETARY'S BUREAU

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
and Eric Joseph Epstein :  
 : Docket No. R-00049255C0007  
v. :  
 :  
PPL Electric Utilities Corporation :

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION  
TO THE COMPLAINT OF ERIC JOSEPH EPSTEIN**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of Eric Joseph Epstein.

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of Mr. Eric Joseph Epstein:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted.
3. The response to Paragraph No. 3 of the Complaint, without engaging in a detailed response to Mr. Epstein's numerous averments, PPL Electric admits that Mr. Epstein has been a participant in prior proceedings before the Pennsylvania Public Utility Commission involving PPL Electric.
4. In response to Paragraph No. 4 of the Complaint, it is admitted that PPL Electric filed with the Pennsylvania Public Utility Commission on March 29, 2004, Supplement No. 38 to Tariff – Electric Pa. P.U.C. No. 201, together with supporting testimony and exhibits.

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APR 30 2004

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5. In response to Paragraph No. 5 of the Complaint, it is admitted that in Supplement No. 38, PPL Electric proposed, *inter alia*, increases in base rates designed to produce \$164.4 million of additional annual operating revenues from distribution rates. In addition, PPL Electric has proposed to pass-through \$57.2 million of charges that PPL Electric pays for transmission services which it purchases under tariffs regulated by the Federal Energy Regulatory Commission. In total, PPL Electric has proposed increases in rates to produce \$221.6 million of increased annual operating revenues.

6. In response to Paragraph No. 6 of the Complaint, it is admitted that PPL Electric has proposed a return on equity of 11.5 percent. PPL Electric's proposed increases in rates will become effective on January 1, 2005.

7. In response to Paragraph No. 7 of the Complaint, it is admitted that PPL Electric has proposed a Transmission Service Charge to provide for recovery of charges that PPL Electric pays for transmission services which it purchases under tariffs regulated by the Federal Energy Regulatory Commission. PPL Electric has proposed that the Transmission Service Charge become effective on January 1, 2005.

8. The averments of Paragraph No. 8 of the Complaint are admitted.

9. The averments of Paragraph No. 9 of the Complaint are denied as stated. In the testimony and exhibits supporting Supplement No. 38, PPL Electric has explained all of the reasons for the increases in rates. These documents speak for themselves, and therefore, Mr. Epstein's summary of the reasons for the increases in rates is denied.

10. The averments of Paragraph No. 10 of the Complaint are conclusions of law to which no response is required. By way of further response, however, such averments are denied. To the contrary, the testimony and exhibits filed by PPL Electric in support

of Supplement No. 38 demonstrate that the proposed rates are just, reasonable, not unreasonably discriminatory and comply with all applicable Sections of the Public Utility Code and opinions of the appellate courts of Pennsylvania interpreting the Public Utility Code.

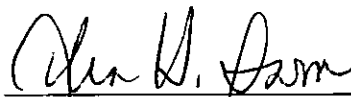
11. The averments of Paragraph No. 11 of the Complaint are conclusions of law to which no response is required.

12. The averments of Paragraph No. 12 of the Complaint are attempts by Mr. Epstein to preserve legal issues not specifically raised in his Complaint. As such, the averments of Paragraph No. 12 of the Complaint are conclusions of law to which no response is required.

13. The averments of Paragraph No. 13 of the Complaint are requests for relief to which no response is required.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Complaint of Eric Joseph Epstein, be denied.

Respectfully submitted,



---

David B. MacGregor  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Voice: 215.963.5448  
Fax: 215.963.5001  
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Michael W. Gang  
John H. Isom  
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417 Walnut Street  
Harrisburg, PA 17101-1904  
Voice: 717.237.4000  
Fax: 717.237.4004  
E-mail: mgang@morganlewis.com  
jisol@morganlewis.com

Paul E. Russell  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
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Allentown, PA 18101-1179  
Voice: 610.774.4254  
Fax: 610.774.6726  
E-mail: perussell@pplweb.com

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: April 26, 2004

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to the Complaint of Eric Joseph Epstein, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

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

Richard A. Kanaskie, Esquire  
Office of Trial Staff  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

David M. Kleppinger, Esquire  
Pamela C. Polacek, Esquire  
Karen S. Miller, Esquire  
McNees Wallace & Nurick  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 71108

David A. McCormick, Esquire  
Department of the Army  
Office of The Judge Advocate General  
901 North Stuart Street  
Arlington, VA 22203-1837

Stephen J. Baron, President  
J. Kennedy & Associates Inc.  
570 Colonial Park Drive, Suite 305  
Roswell, GA 30075-3770

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

Eric Joseph Epstein  
4100 Hillsdale Road  
Harrisburg, PA 17112

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

Joseph L. Vullo, Esquire  
Attorney at Law  
1460 Wyoming Avenue  
Fort Fort, PA 18704

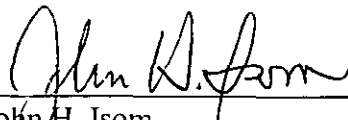
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2004 APR 26 PM 4:06

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

Kent Murphy, Esquire  
Law Department  
Exelon Business Services Company  
2301 Market Street/23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699

Date: April 26, 2004

  
\_\_\_\_\_  
John H. Isom

Morgan, Lewis & Bockius LLP  
One Commerce Square  
417 Walnut Street  
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Fax: 717.237.4001  
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**Morgan Lewis**  
COUNSELORS AT LAW

ORIGINAL

John H. Isom  
717.237.4022  
jisom@morganlewis.com

July 21, 2004

**VIA HAND DELIVERY**

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

RECEIVED  
2004 JUL 21 PM 3:54  
SECRETARY'S BUREAU

**Re: Victoria K. Mackin v. PPL Electric Utilities Corporation**  
**Docket No. R-00049255C0008**

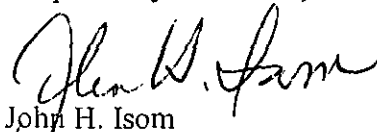
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of Victoria K. Mackin in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

**DOCUMENT  
FOLDER**

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Victoria K. Mackin :  
v. : Docket No. R-00049255C0008  
PPL Electric Utilities Corporation :

ANSWER TO COMPLAINT

**DOCKETED**  
JUL 30 2004

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Victoria K. Mackin as follows:

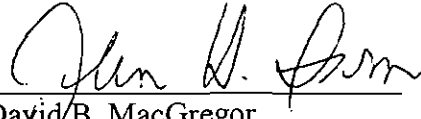
1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted except that the correct, full name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are denied. To the contrary, PPL Electric's proposed rates are just and reasonable and comply with all applicable provisions of the Public Utility Code.
4. The averments of Paragraph No. 4 of the Complaint are requests for relief, to which no response is required.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Victoria K. Mackin be denied.

**DOCUMENT  
FOLDER**

RECEIVED  
2004 JUL 21 PM 3:54  
SECRETARY'S BUREAU

Respectfully submitted,



David B. MacGregor  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Voice: 215.963.5448  
Fax: 215.963.5001  
E-mail: dmacgregor@morganlewis.com

Michael W. Gang  
John H. Isom  
Morgan, Lewis & Bockius LLP  
One Commerce Square  
417 Walnut Street  
Harrisburg, PA 17101-1904  
Voice: 717.237.4000  
Fax: 717.237.4004  
E-mail: mgang@morganlewis.com  
jisom@morganlewis.com

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

Attorneys for PPL Electric  
Utilities Corporation

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: July 21, 2004



**CERTIFICATE OF SERVICE**

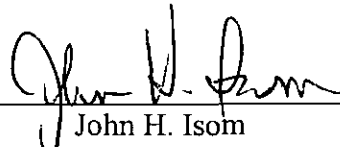
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Victoria K. Mackin, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

Victoria K. Mackin  
One Green Acres  
McAdoo, PA 18237

Date: July 21, 2004

  
\_\_\_\_\_  
John H. Isom

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2004 JUL 21 PM 3:54  
SECRETARY'S BUREAU

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

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

ORIGINAL

John H. Isom  
717.237.4022  
jisom@morganlewis.com

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2004 JUL 21 PM 3:53  
SECRETARY'S BUREAU

July 21, 2004

**VIA HAND DELIVERY**

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

**Re: Cheryl & Jeremy Ebert v. PPL Electric Utilities Corporation  
Docket No. R-00049255C0009**

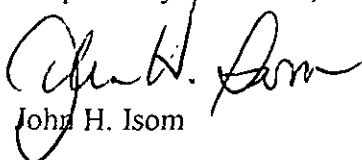
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of Cheryl and Jeremy Ebert in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

DOCUMENT  
FOLDER

**ORIGINAL**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Cheryl and Jeremy Ebert

v.

PPL Electric Utilities Corporation

:  
:  
:  
:  
:

Docket No. R-00049255C0009

**DOCUMENT  
FOLDER**

**ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Cheryl and Jeremy Ebert as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted.
3. The averments of Paragraph No. 3 of the Complaint are denied. It is

admitted that PPL Electric has proposed to raise rates to residential customers by approximately 9.8% on an overall basis. PPL Electric's proposed rates, however, are just and reasonable and comply with all applicable provisions of the Public Utility Code.

Information concerning the personal circumstances of Mr. and Mrs. Ebert is not reasonably available to PPL Electric, and therefore, such averments are denied.

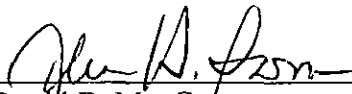
4. The averments of Paragraph No. 4 of the Complaint are requests for relief, to which no response is required.

**DOCKETED**  
JUL 30 2004

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2004 JUL 21 PM 3:53  
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WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Cheryl and Jeremy Ebert be denied.

Respectfully submitted,

  
David B. MacGregor  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Voice: 215.963.5448  
Fax: 215.963.5001  
E-mail: dmacgregor@morganlewis.com

Michael W. Gang  
John H. Isom  
Morgan, Lewis & Bockius LLP  
One Commerce Square  
417 Walnut Street  
Harrisburg, PA 17101-1904  
Voice: 717.237.4000  
Fax: 717.237.4004  
E-mail: mgang@morganlewis.com  
jisom@morganlewis.com

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

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: July 21, 2004

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

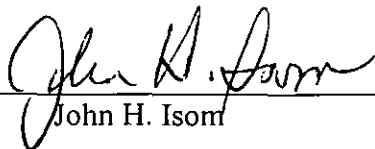
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Cheryl and Jeremy Ebert, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

Cheryl and Jeremy Ebert  
2820 Mosser Street  
Allentown, PA 18103

Date: July 21, 2004

  
\_\_\_\_\_  
John H. Isom

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2004 JUL 21 PM 3:53  
SECRETARY'S BUREAU

Morgan, Lewis & Bockius LLP  
One Commerce Square  
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Harrisburg, PA 17101-1904  
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www.morganlewis.com

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

ORIGINAL

John H. Isom  
717.237.4022  
jisom@morganlewis.com

July 21, 2004

**VIA HAND DELIVERY**

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

**Re: Martha Wells v. PPL Electric Utilities Corporation  
Docket No. R-00049255C0010**

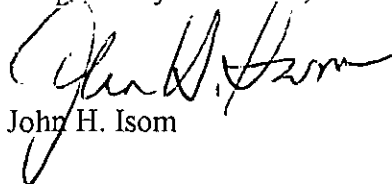
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of Martha Wells in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

**DOCUMENT  
FOLDER**

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2004 JUL 21 PM 3:52  
SECRETARY'S BUREAU

ORIGINAL

DOCUMENT FOLDER

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Martha Wells

v.

PPL Electric Utilities Corporation

:  
:  
:  
:  
:

Docket No. R-00049255C0010

2004 JUL 21 PM 3:52  
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ANSWER TO COMPLAINT

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

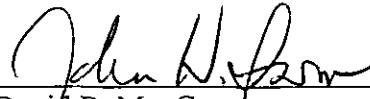
PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Martha Wells as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted, except that the correct, full name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are denied. PPL Electric's proposed rates are just and reasonable and complies with all applicable provisions of the Public Utility Code.
4. The averments of Paragraph No. 4 of the Complaint are requests for relief, to which no response is required. By way of further response, the personal circumstances of Martha Wells are not reasonably available to PPL Electric, and therefore, such averments are denied.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Martha Wells be denied.

DOCKETED  
JUL 30 2004

Respectfully submitted,



David B. MacGregor  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Voice: 215.963.5448  
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E-mail: dmacgregor@morganlewis.com

Michael W. Gang  
John H. Isom  
Morgan, Lewis & Bockius LLP  
One Commerce Square  
417 Walnut Street  
Harrisburg, PA 17101-1904  
Voice: 717.237.4000  
Fax: 717.237.4004  
E-mail: mgang@morganlewis.com  
jisom@morganlewis.com

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

Attorneys for PPL Electric  
Utilities Corporation

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: July 21, 2004



**CERTIFICATE OF SERVICE**

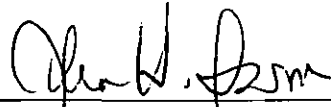
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Martha Wells, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

Martha Wells  
P.O. Box 212  
Wiconisco, PA 17097

Date: July 21, 2004

  
\_\_\_\_\_  
John H. Isom

RECEIVED  
2004 JUL 21 PM 3:52  
SECRETARY'S BUREAU

Morgan, Lewis & Bockius LLP  
One Commerce Square  
417 Walnut Street  
Harrisburg, PA 17101-1904  
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Morgan Lewis  
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jisom@morganlewis.com

DOCUMENT  
FOLDER

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2004 JUL 23 PM 3:35  
SECRETARY'S BUREAU

July 23, 2004

**VIA HAND DELIVERY**

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

**Re: Wal-Mart Stores East, LP v. PPL Electric Utilities Corporation  
Docket No. R-00049255C0012**

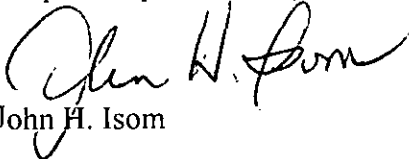
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of Wal-Mart Stores East, LP in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

**DOCUMENT  
FOLDER**

**DOCKETED**  
JUL 28 2004

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

2004 JUL 23 P11 35  
SECRETARY'S BUREAU

RECEIVED

Pennsylvania Public Utility Commission, :  
Wal-Mart Stores East, LP :

v. :

Docket No. R-00049255C0012

PPL Electric Utilities Corporation :

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO THE  
COMPLAINT OF WAL-MART STORES EAST, LP**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of Wal-Mart Stores East, LP ("Wal-Mart") as follows:

1. Specific information concerning the operations of Wal-Mart is not reasonably available to PPL Electric, and therefore, averments concerning its operations are denied. It is admitted that Wal-Mart is a customer of PPL Electric at several locations.

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

3. The averments of Paragraph No. 3 of the Complaint are denied as stated.

It is admitted, however, that on March 29, 2004, PPL Electric filed with the Pennsylvania Public Utility Commission ("Commission") Supplement No. 38 to Tariff – Electric Pa. P.U.C. No. 201, together with supporting data. Therein, PPL Electric proposed an increase in base rates with a tariff effective date of June 1, 2004. The effective date of Supplement No. 38 was suspended by operation of Section 1308(d) of the Public Utility Code, 66 Pa.C.S. § 1308(d), until January 1, 2005.

4. Without addressing the specifics of the averments of Paragraph No. 4 of the Complaint, PPL Electric admits that Wal-Mart is a customer of PPL Electric at several locations and that rates proposed in Supplement No. 38 would increase bills to Wal-Mart.

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

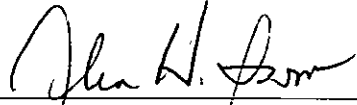
6. The averments of Paragraph No. 6 of the Complaint are denied. To the contrary, PPL Electric's proposed increase in rates is just and reasonable and complies with all applicable provisions of the Public Utility Code.

7. In Paragraph No. 7 of the Complaint, Wal-Mart states that it will comply with the schedule established for this proceeding at the prehearing conference. PPL Electric concurs that it is appropriate for Wal-Mart to comply with the schedule established at the prehearing conference.

The remaining averments of Wal-Mart's Complaint are requests for relief to which no response is required.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Wal-Mart Stores East, LP, be denied.

Respectfully submitted,

  
\_\_\_\_\_  
David B. MacGregor  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Voice: 215.963.5448  
Fax: 215.963.5001  
E-mail: dmacgregor@morganlewis.com

Michael W. Gang  
John H. Isom  
Morgan, Lewis & Bockius LLP  
One Commerce Square  
417 Walnut Street  
Harrisburg, PA 17101-1904  
Voice: 717.237.4000  
Fax: 717.237.4004  
E-mail: mgang@morganlewis.com  
jisom@morganlewis.com

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

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: July 23, 2004

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

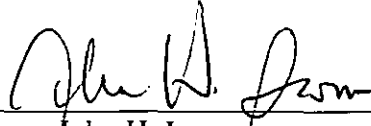
I hereby certify that I have this day served a true copy of the foregoing "Answer of PPL Electric Utilities Corporation to Complaint of Wal-Mart Stores East, LP" upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

James P. Malia  
Kirkpatrick & Lockhart LLP  
Payne Shoemaker Building  
240 North Third Street  
Harrisburg, PA 17101-1507

Date: July 23, 2004

  
\_\_\_\_\_  
John H. Isom

RECEIVED  
2004 JUL 23 PM 3:35  
SECRETARY'S BUREAU

Morgan, Lewis & Bockius LLP  
One Commerce Square  
417 Walnut Street  
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Fax: 717.237.4001  
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ORIGINAL

Morgan Lewis  
COUNSELORS AT LAW

DOCUMENT  
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John H. Isom  
717.237.4022  
jisom@morganlewis.com

July 23, 2004

VIA HAND DELIVERY

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

RECEIVED  
2004 JUL 23 PM 3:36  
SECRETARY'S BUREAU

**Re: Pennsylvania Energy Consortium v. PPL Electric Utilities Corporation**  
**Docket No. R-00049255C0013**

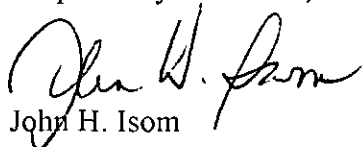
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of Pennsylvania Energy Consortium in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

JHI/jl  
Enclosures  
cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Energy Consortium :  
v. : Docket No. R-00049255C0013  
PPL Electric Utilities Corporation :

**ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of Pennsylvania Energy Consortium ("PEC") as follows:

1. Information concerning PEC is not reasonably available to PPL Electric, and therefore, such averments are denied.
2. The averments of Paragraph No. 2 of the Complaint are admitted.
3. The averments of Paragraph No. 3 of the Complaint are denied as stated.

It is admitted, however, that on March 29, 2004, PPL Electric filed with the Pennsylvania Public Utility Commission ("Commission") Supplement No. 38 to Tariff Electric – Pa. P.U.C. No. 201, together with supporting data. Therein, PPL Electric proposed an increase in base rates with a tariff effective date of June 1, 2004. The effective date of Supplement No. 38 was suspended by operation of Section 1308(d) of the Public Utility Code, 66 Pa.C.S. § 1308(d), until January 1, 2005.

4. PPL Electric is without information sufficient to respond in detail to the averments of Paragraph No. 4 of the Complaint. PPL Electric cannot determine under what rate schedules members of PEC are served because PEC has not identified its

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members. It is admitted, however, that, under Supplement No. 38, rates to customers served under the GS-3 and LP-4 Rate Schedules would increase.

5. PPL Electric is without information sufficient to respond to Paragraph No. 5 of the Complaint. Paragraph No. 5 of the Complaint describes in very general terms the membership of PEC. Because PEC has not identified its members, however, PPL Electric cannot determine the accuracy of PEC's averments.

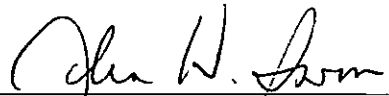
6. The averments of Paragraph No. 6 of the Complaint are denied. To the contrary, PPL Electric's proposed increase in rates is just and reasonable and complies with all applicable provisions of the Public Utility Code.

7. In Paragraph No. 7 of the Complaint, PEC states that it will comply with the schedule established for this proceeding at the prehearing conference. PPL Electric concurs that it is appropriate for PEC to comply with the schedule established at the prehearing conference.

The remaining averments of PEC's Complaint are requests for relief to which no response is required.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Pennsylvania Energy Consortium be denied.

Respectfully submitted,



David B. MacGregor  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
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John H. Isom  
Morgan, Lewis & Bockius LLP  
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Paul E. Russell  
Associate General Counsel  
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Office of General Counsel  
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Fax: 610.774.6726  
E-mail: perussell@pplweb.com

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: July 23, 2004

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

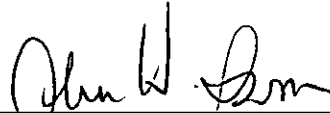
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Pennsylvania Energy Consortium upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

James P. Malia  
Kirkpatrick & Lockhart LLP  
Payne Shoemaker Building  
240 North Third Street  
Harrisburg, PA 17101-1507

Date: July 23, 2004

  
\_\_\_\_\_  
John H. Isom

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Morgan, Lewis & Bockius LLP  
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Harrisburg, PA 17101-1904  
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Morgan Lewis  
COUNSELORS AT LAW

John H. Isom  
717.237.4022  
jhisom@morganlewis.com

DOCUMENT  
FOLDER

July 23, 2004

VIA HAND DELIVERY

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

Re: **Donald E. McGarrigle v. PPL Electric Utilities Corporation**  
**Docket No. R-00049255C0014**

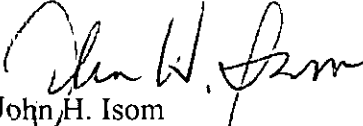
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of Donald E. McGarrigle in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Donald E. McGarrigle :  
 :  
v. : Docket No. R-00049255C0014  
 :  
PPL Electric Utilities Corporation :

**ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:


PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Donald E. McGarrigle as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted except that the correct, full name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are denied. To the contrary, PPL Electric's proposed increase in rates is just and reasonable and complies with all applicable provisions of the Public Utility Code. Information concerning the personal circumstances of Mr. McGarrigle is not reasonably available to PPL Electric, and therefore, such averments are denied. PPL Electric acknowledges that its rates have changed over the last forty years, but all such changes were approved by the Pennsylvania Public Utility Commission.
4. The averments of Paragraph No. 4 of the Complaint are requests for relief, to which no response is required.

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WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Donald E. McGarrigle be denied.

Respectfully submitted,



David B. MacGregor  
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Paul E. Russell  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
Two North Ninth Street  
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Fax: 610.774.6726  
E-mail: perussell@pplweb.com

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: July 23, 2004

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

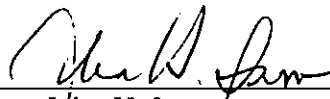
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Donald E. McGarrigle, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

Donald E. McGarrigle  
34 Larchwood Road  
Wyomissing, PA 19610-1944

Date: July 23, 2004

  
\_\_\_\_\_  
John H. Isom

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Morgan, Lewis & Bockius LLP  
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July 23, 2004

**VIA HAND DELIVERY**

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

**Re: Curvin L. Snyder v. PPL Electric Utilities Corporation**  
**Docket No. R-00049255C0015**

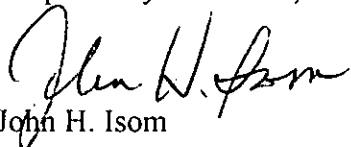
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of Curvin L. Snyder in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Curvin L. Snyder :  
v. : Docket No. R-00049255C00150  
PPL Electric Utilities Corporation :

ANSWER TO COMPLAINT

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Curvin L. Snyder as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted except that the correct, full name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are irrelevant, incorrect or both.

(1) In response to Paragraph No. 3.(1) of the Complaint, it is admitted that Mr. Snyder included the chart that was published in the *Harrisburg Patriot*. It is noted that PPL Electric pays only a small portion of the total compensation to Mr. Hecht. Further, the majority of the increase in compensation to which Mr. Snyder refers resulted from the exercise by Mr. Hecht of stock options granted in prior periods.

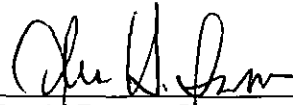
(2) In response to Paragraph No. 3.(2) of the Complaint, averments concerning the results of operations of corporations affiliated with PPL Electric in foreign countries is irrelevant to this proceeding. PPL Electric has made no claim for any compensation from customers related to foreign operations of affiliates.

(3) Paragraph No. 3.(3) is argumentative and is too vague for PPL Electric to respond specifically. By way of further response, however, the excellent performance of PPL Electric's management is explained in Statement No. 1 of the filing.

(4) Information concerning Mr. Snyder's personal circumstances is not reasonably available to PPL Electric, and therefore, such averments are denied. The averments of Paragraph No. 3.(4) of the Complaint are requests for relief to which no response is required.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Curvin L. Snyder be denied.

Respectfully submitted,



David B. MacGregor  
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1701 Market Street  
Philadelphia, PA 19103-2921  
Voice: 215.963.5448  
Fax: 215.963.5001  
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Michael W. Gang  
John H. Isom  
Morgan, Lewis & Bockius LLP  
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417 Walnut Street  
Harrisburg, PA 17101-1904  
Voice: 717.237.4000  
Fax: 717.237.4004  
E-mail: mgang@morganlewis.com  
jisom@morganlewis.com

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

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: July 23, 2004

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

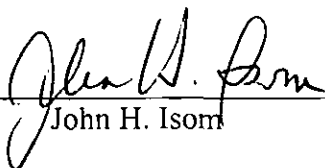
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Curvin L. Snyder, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

Curvin L. Snyder  
1390 Valley Road  
Etters, PA 17319

Date: July 23, 2004

  
\_\_\_\_\_  
John H. Isom

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Morgan, Lewis & Bockius LLP  
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COUNSELORS AT LAW

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John H. Isom  
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jisom@morganlewis.com

July 23, 2004

VIA HAND DELIVERY

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

Re: **William J. Junkin, III v. PPL Electric Utilities Corporation**  
**Docket No. R-00049255C0016**

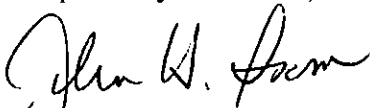
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of William J. Junkin, III in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

William J. Junkin, III :  
v. : Docket No. R-00049255C0016  
PPL Electric Utilities Corporation :

**ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the William J. Junkin, III as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted except that the correct, full name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are composed of argumentative statements and a request for relief. No response is required to such averments. By way of further response, however, the rates proposed by PPL Electric in this proceeding are just and reasonable and comply with all applicable provisions of the Public Utility Code.
4. The averments of Paragraph No. 4 of the Complaint are requests for relief, to which no response is required.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of William J. Junkin, III be denied.

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Respectfully submitted,



David B. MacGregor  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
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Michael W. Gang  
John H. Isom  
Morgan, Lewis & Bockius LLP  
One Commerce Square  
417 Walnut Street  
Harrisburg, PA 17101-1904  
Voice: 717.237.4000  
Fax: 717.237.4004  
E-mail: mgang@morganlewis.com  
jisom@morganlewis.com

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

Attorneys for PPL Electric  
Utilities Corporation

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: July 23, 2004



**CERTIFICATE OF SERVICE**

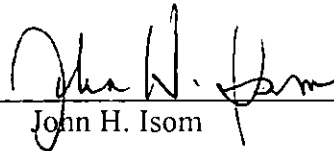
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of William J. Junkin, III, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

William J. Junkin, III  
438 South 25th Street  
Harrisburg, PA 17104

Date: July 23, 2004

  
\_\_\_\_\_  
John H. Isom

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SECRETARY'S BUREAU

Morgan, Lewis & Bockius LLP  
One Commerce Square  
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Harrisburg, PA 17101-1904  
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www.morganlewis.com

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

**John H. Isom**  
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jisom@morganlewis.com

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August 4, 2004

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

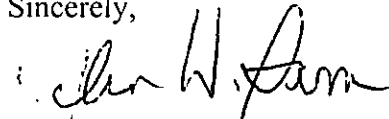
**Re: Margaret M. Stuski v. PPL Electric Utilities Corporation**  
**Docket No. R-00049255C0011**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Answer to Complaint and New Matter and an original and three (3) copies of the Motion of PPL Electric Utilities Corporation to Dismiss the Complaint of Margaret M. Stuski in the above-referenced proceeding.

As indicated on the enclosed certificate of service, copies of the above documents are being served on Administrative Law Judge Turner and on the Complainant, Margaret M. Stuski via Federal Express.

Sincerely,



John H. Isom

JHI/jl

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Enclosure

c: Certificate of Service

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Margaret M. Stuski

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v.

Docket No. R-00049255C001

PPL Electric Utilities Corporation :

SECRETARY'S BUREAU  
AUG 4 PM 4:05

**ANSWER TO COMPLAINT AND NEW MATTER**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of Margaret M. Stuski as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted except that the correct, full name of the Respondent is PPL Electric Utilities Corporation.
3. PPL Electric responds to each of the separately numbered sub-paragraphs of Paragraph No. 3 of the Complaint as follows:

- (1) The averments of Paragraph No. 3.1. are admitted.
- (2) Detailed information concerning any arbitration or business between Ms. Stuski and H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, such averments are denied.

- (3) In response to Paragraph No. 3.3. of the Complaint, it is admitted that PPL Electric is an electric distribution company subject to the regulatory jurisdiction of the Pennsylvania Public Utility Commission ("Commission").

- (4) In response to Paragraph No. 3.4. of the Complaint, it is admitted that H.T. Lyons Inc. is a business corporation and is a mechanical contractor. By way of

further response, however, PPL Electric understands that H.T. Lyons Inc. is a mechanical contractor generally engaged in the air conditioning and heating business. As such, its business activities are not subject to the regulatory jurisdiction of the Commission.

(5) In response to Paragraph No. 3.5. of the Complaint, it is denied that H.T. Lyons Inc. is a “fully-owned subsidiary of” PPL Electric. To the contrary, PPL Electric has no ownership interest in H.T. Lyons Inc. It is admitted, however, that H.T. Lyons Inc. is an affiliate of PPL Electric.

(6) The averments of Paragraph No. 3.6. of the Complaint are denied. As explained above, PPL Electric has no ownership interest in H.T. Lyons Inc., and therefore, PPL Electric did not seek approval from the Commission to acquire H.T. Lyons Inc.

(7) The averments of Paragraph No. 3.7. of the Complaint are too vague to be answered by PPL Electric. By way of further response, however, detailed information concerning the activities of H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.7. of the Complaint are denied. As explained above, it is denied also that H.T. Lyons Inc. is a subsidiary of PPL Electric.

(8) The averments of Paragraph No. 3.8. of the Complaint are denied. PPL Electric has no ownership of or control over H.T. Lyons Inc. Therefore, PPL Electric does not “allow” H.T. Lyons Inc. to expend legal fees in any amount.

(9) Detailed information concerning the activities of H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No.

3.9. of the Complaint are denied. By way of further response, however, H.T. Lyons Inc. does not have access to the resources of PPL Electric.

(10) Paragraph No. 3.10. of the Complaint merely incorporates Paragraph Nos. 3.1. through 3.9. into Paragraph No. 3.10. By way of further response, Paragraph Nos. 3.1. through 3.9. of this Answer are incorporated herein by reference.

(11) Detailed information concerning the operations and activities of H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.11. of the Complaint are denied.

(12) Detailed information concerning contracts entered into by H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.12. of the Complaint are denied.

(13) Detailed information concerning litigation and arbitration conducted by H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.13. of the Complaint are denied.

(14) Detailed information concerning contracts entered into by H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.14. of the Complaint are denied.

(15) Detailed information concerning mechanics liens filed by H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.15. of the Complaint are denied.

(16) Detailed information concerning litigation and arbitration conducted by H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.16. of the Complaint are denied.

(17) Detailed information concerning the activities of H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.17. of the Complaint are denied.

(18) Detailed information concerning the activities of H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.18. of the Complaint are denied.

(19) Detailed information concerning the actions of and statements by officers of H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.19. of the Complaint are denied. By way of further response, however, PPL Electric does not have any legal department.

(20) Detailed information concerning statements by officers of H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.20. of the Complaint are denied.

(21) Detailed information concerning the legal fees incurred by H.T. Lyons Inc. and the activities of its attorneys is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.21. of the Complaint are denied.

(22) Detailed information concerning legal fees incurred by H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.22 of the Complaint are denied.

(23) Detailed information concerning amounts of money owed to H.T. Lyons Inc. and amounts paid by the "design/builder," which is not identified in the Complaint, is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.23. of the Complaint are denied.

(24) Detailed information concerning the “design/build company” and litigation conducted by H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.24. of the Complaint are denied. By way of further response, it is denied that PPL Electric had any involvement in the disputes to which reference is made in the Complaint.

In the Complaint, two paragraphs are identified as Paragraph No. 24. In response to the second Paragraph No. 24 of the Complaint, detailed information concerning payments made by “the design/build company,” which is not identified in the Complaint, and litigation conducted by H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of the second Paragraph No. 3.24. of the Complaint are denied.

(25) In response to Paragraph No. 3.25. of the Complaint, it is denied that PPL Electric’s resources were utilized in the dispute to which reference is made in the Complaint. By way of further response, however, PPL Electric does not have any legal department.

(26) Detailed information concerning H.T. Lyons Inc.’s activities is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.26. of the Complaint are denied.

(27) Detailed information concerning statements made by officers of H.T. Lyons Inc., its actions and its contracts is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.27. of the Complaint are denied.

(28) Detailed information concerning the actions of H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No.

3.28. of the Complaint are denied. As explained above, PPL Electric has no ownership interest in or control over H.T. Lyons Inc. It is denied specifically that PPL Electric either “allowed” or “encourages” H.T. Lyons Inc. to engage in any specific activity.

(29) Detailed information concerning correspondence to officers of H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.29. of the Complaint are denied.

(30) Detailed information concerning the activities of officers of H.T. Lyons Inc. is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 3.30. of the Complaint are denied.

The next Paragraph of the Complaint is a request for relief to which no response is required.

(29.A.) The next Paragraph of the Complaint repeats Paragraph No. 29. To differentiate it from the prior Paragraph No. 29, it is referred to herein as Paragraph No. 3.29.A. Paragraph No. 3.29.A. incorporates Paragraph Nos. 1 through 30 of the Complaint into Paragraph No. 3.29.A. In response thereto, Paragraph Nos. 1 through 30 of this Answer are incorporated herein by reference.

(30.A.) The next Paragraph of the Complaint repeats Paragraph No. 30. To differentiate it from the prior Paragraph No. 30, it is referred to herein as Paragraph No. 3.30.A. Paragraph No. 3.30.A. of the Complaint is too vague to identify the circumstances to which it refers. The Complaint does not identify the relevant dates or the “business service” to which it refers.

(31) The averments of Paragraph No. 3.31 of the Complaint are too vague for PPL Electric to respond. The Complaint does not identify the forum where she

filed a complaint, the date of filing, the docket number, or resolution of the matter to which the Complaint refers. Absent more specific information, PPL Electric is unable to respond.

(32) The averments of Paragraph No. 3.32. of the Complaint are too vague for PPL Electric to respond. The Complaint does not identify the forum where she filed a complaint, the docket number, the date of the proceeding to which the Complaint refers.

(33) Paragraph No. 3.33 of the Complaint is a request for relief to which no response is required.

(34) The averments of Paragraph No. 3.34 of the Complaint are legal arguments, and not factual in nature, and therefore, no response is required. The remaining averments of the Complaint are requests for relief to which no response is required.

#### **NEW MATTER**

4. All of the subjects of the above-captioned Complaint of Margaret M. Stuski are irrelevant to this base rate proceeding under Section 1308(d) of the Public Utility Code. Even if the Commission were to exercise jurisdiction over the Complaint, which it should not for the reasons explained below and in the accompanying Motion to Dismiss, the Complaint of Margaret M. Stuski should not be consolidated with PPL Electric's base rate case at Docket No. R-00049255.

5. The Commission lacks subject matter jurisdiction over the matters raised in the Complaint.

a. All of the averments of the Complaint deal with H.T. Lyons Inc., which engages in unregulated businesses, more specifically, H.T. Lyons Inc. is a mechanical contractor which engages in the air conditioning and heating businesses.

b. As such, H.T. Lyons Inc. is not subject to the regulatory jurisdiction of the Commission.

c. The only possible jurisdiction of the Commission over matters related to H.T. Lyons Inc. would arise from transactions between PPL Electric and H.T. Lyons Inc. under sections of the Public Utility Code dealing with relations of public utilities with affiliated interests.

d. In this regard, the Complaint does not make any averments concerning transactions between PPL Electric and H.T. Lyons Inc., with the possible exception of transactions involving legal services.

e. With regard to legal services, PPL Electric has no legal department and does not provide legal services to any of its affiliates. To the contrary, legal services are provided within the PPL Corporation corporate system by PPL Services Corp. or outside counsel.

f. Any legal services provided to H.T. Lyons Inc. were provided by either PPL Services Corporation or outside counsel. No transaction related to the provision of legal services to H.T. Lyons Inc. involved PPL Electric.

g. No expense for legal services on behalf of H.T. Lyons Inc. are reflected in PPL Electric's proposed increase in rates at Docket No. R-00049255.

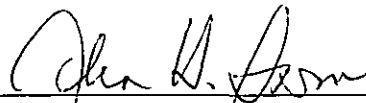
h. The Commission does not have any jurisdiction over the matter raised in the Complaint of Margaret M. Stuski, which involve private disputes between an unregulated mechanical contractor, H.T. Lyons Inc., and other entities, all arising under construction contracts.

6. The averments of the Complaint of Margaret M. Stuski are too vague to permit PPL Electric to respond thereto. The Complaint seems to refer to a series of disputes and legal actions for which the parties, forums, docket numbers, the identities of other parties or relevant dates are not provided.

7. Together with the Answer and New Matter, PPL Electric is filing, pursuant to 52 Pa. Code § 5.101(a)(1), a Motion to Dismiss the Complaint of Margaret M. Stuski for lack of jurisdiction.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Margaret M. Stuski be denied.

Respectfully submitted,



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jisom@morganlewis.com

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Office of General Counsel  
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Fax: 610.774.6726  
E-mail: perussell@pplweb.com

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: August 4, 2004

Attorneys for PPL Electric  
Utilities Corporation



DOCUMENT  
FOLDER

DOCKETED  
AUG 17 2004

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SECRETARY'S OFFICE  
PA PUC

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ORIGINAL

Margaret M. Stuski

v.

Docket No. R-00049255C0011

PPL Electric Utilities Corporation

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION  
TO DISMISS THE COMPLAINT OF MARGARET M. STUSKI**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby files, pursuant to 52 Pa. Code § 5.101(a)(1) a Motion to Dismiss the above-captioned complaint of Margaret M. Stuski because the Pennsylvania Public Utility Commission ("Commission") lacks jurisdiction over the subject matter of the Complaint. In support of the Motion to Dismiss, PPL Electric states the following:

1. All of the averments of the Complaint deal with H.T. Lyons Inc., which engages in unregulated businesses, more specifically, H.T. Lyons Inc. is a mechanical contractor which engages in the air conditioning and heating businesses.
2. H.T. Lyons Inc. does not offer public utility services to the public, and the Complaint fails to aver that H.T. Lyons Inc. does offer or provide public utility services to the public.
3. As such, H.T. Lyons Inc. is not subject to the regulatory jurisdiction of the Commission.
4. Instead, the Complaint refers to a series of private disputes, arbitrations and litigations between H.T. Lyons Inc. and other parties which generally arise under construction contracts for air conditioning or heating equipment or systems.

5. According to the Complaint, many of these disputes have already been considered in other forums. *See, e.g.*, Complaint Paragraph Nos. 13,15, 16, and 31.

6. The Commission does not have jurisdiction over the disputes that are alleged in the Complaint.

7. H.T. Lyons Inc. is affiliated with PPL Electric as a result of common ownership. Both H.T. Lyons Inc. and PPL Electric are direct or indirect wholly-owned subsidiaries of PPL Corporation.

8. The only possible jurisdiction of the Commission over matters related to H.T. Lyons Inc. would arise from transactions between PPL Electric and H.T. Lyons Inc. under sections of the Public Utility Code dealing with relations of public utilities with affiliated interests. 66 Pa.C.S. Ch. 21.

9. In this regard, the Complaint does not make any averments concerning transactions between PPL Electric and H.T. Lyons Inc., with the possible exception of transactions involving legal services.

10. With regard to legal services, PPL Electric has no legal department and does not provide legal services to any of its affiliates. To the contrary, within the PPL Corporation corporate system, legal services are provided by PPL Services Corp. or outside counsel.

11. To the extent that legal services were provided to H.T. Lyons Inc. they were provided as part of transactions directly between H.T. Lyons Inc. and PPL Services Corporation or outside counsel. PPL Electric bore no portion of the costs of any legal services furnished to H.T. Lyons Inc.

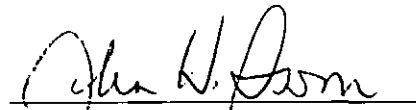
12. No expenses for legal services on behalf of H.T. Lyons Inc. are reflected in PPL Electric's proposed increase in rates at Docket No. R-00049255.

13. Such matters are addressed in PPL Electric's rate filing in Exhibit Regs. § 53.52. II -D-8, page 2, where it is explained that the Office of General Counsel of PPL Services Corporation provides legal services within the PPL Corporation corporate system and that : "Direct charges to clients are based on actual cost incurred for specific services rendered." Thus, PPL Electric does not incur any charges for legal services furnished to H.T. Lyons Inc.. This Exhibit is sponsored by PPL Electric witness J.R. Schadt, who is scheduled to testify in the hearings in the rate proceeding on Monday, August 9, 2004.

14. The Commission does not have any jurisdiction over the matter raised in the Complaint of Margaret M. Stuski, which involve private disputes between an unregulated mechanical contractor, H.T. Lyons Inc., and other entities, all arising under construction contracts.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Margaret M. Stuski be dismissed.

Respectfully submitted,



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Of Counsel:

Morgan, Lewis & Bockius LLP

Date: August 4, 2004

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

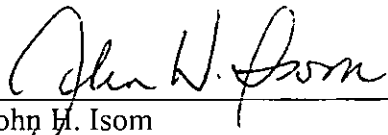
I hereby certify that I have this day served a true copy of the foregoing “**Answer to Complaint and New Matter**” and “**Motion of PPL Electric Utilities Corporation to Dismiss the Complaint of Margaret M. Stuski**” upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FEDERAL EXPRESS**

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

Margaret M. Stuski  
908 Walnut Street  
Wormleysburg, PA 17043

Date: August 4, 2004

  
\_\_\_\_\_  
John H. Isom

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2004 AUG -4 PM 4: 04  
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ORIGINAL

SECRETARY'S BUREAU  
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August 10, 2004

**VIA HAND DELIVERY**

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

**Re: Philip A. Trump v. PPL Electric Utilities Corporation**  
**Docket No. R-00049255C0017**

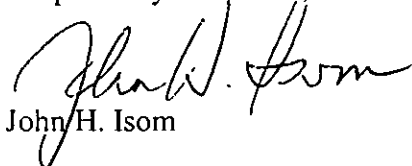
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of Philip A. Trump in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

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FOLDER

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**ORIGINAL**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Philip A. Trump :  
 :  
v. : Docket No. R-00049255C0017  
 :  
PPL Electric Utilities Corporation :

**ANSWER TO COMPLAINT AND NEW MATTER**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of Philip A. Trump as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted except that the correct, full name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are admitted in part and denied in part. Initially, it is noted that information concerning Mr. Trump's personal circumstances is not reasonably available to PPL Electric, and therefore, such averments are denied. It is admitted that PPL Electric's present and proposed rates provide for recovery of uncollectible accounts expense. Uncollectible accounts expense, however, is a cost of doing business and is properly included in determining PPL Electric's revenue requirement. Although PPL Electric's present and proposed rates provide for recovery of uncollectible account expense, such expenses are subject to review and examination during rate proceedings. Thus, although PPL Electric's present and proposed rates provide for recovery of uncollectible accounts expense, PPL's

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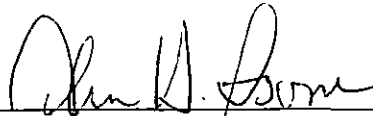
proposed rates are just and reasonable and comply with all applicable provisions in the Public Utility Code.

The remaining averments of Paragraph No. 3 of the Complaint are denied. To the contrary, PPL Electric applies its tariff and collection procedures in a non-discriminatory manner.

4. The averments of Paragraph No. 4 of the Complaint are requests for relief to which no response is required.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Phillip A. Trump be denied.

Respectfully submitted,



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Of Counsel:

Morgan, Lewis & Bockius LLP

Date: August 10, 2004

Paul E. Russell  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
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Fax: 610.774.6726  
E-mail: perussell@pplweb.com

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

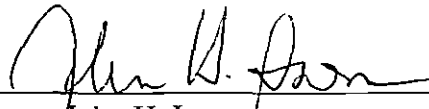
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Philip A. Trump, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

Philip A. Trump  
3229 Carbon Street  
Whitehall, PA 18052

Date: August 10, 2004

  
\_\_\_\_\_  
John H. Isom

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PA PUC  
SECRETARY'S BUREAU

Morgan, Lewis & Bockius LLP  
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August 16, 2004

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VIA HAND DELIVERY

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

**Re: Pennsylvania Retailers Association v. PPL Electric Utilities Corporation  
Docket No. R-00049255C0018**

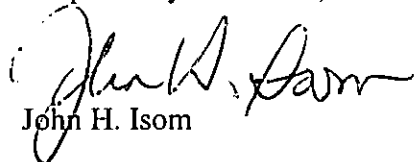
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of Pennsylvania Retailers Association in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

ad

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

Pennsylvania Retailers Association :  
v. : Docket No. R-00049255C0018  
PPL Electric Utilities Corporation :

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ANSWER TO COMPLAINT

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of Pennsylvania Retailers Association as follows:

1. Information concerning the organization and membership of the Pennsylvania Retailers Association is not reasonably available to PPL Electric, and therefore, such averments are denied..

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

3. The averments of Paragraph No. 3 of the Complaint are denied as stated.

It is admitted that on March 29, 2004, PPL Electric filed Supplement No. 38 to Tariff-Electric Pa. P.U.C. No. 201 to become effective on June 1, 2004. By operations of Section 1308(d) of the Public Utility Code, 66 Pa.C.S. § 1308(d), Supplement No. 38 was suspended until January 1, 2005.

4. Because the Pennsylvania Retailers Association has not identified its members, PPL Electric is unable to confirm whether such members are customers and the rate schedule under which they are served by PPL Electric. Therefore, such averments are denied.

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With regard to the Pennsylvania Retailers Association's contention that its rates will increase, the Pennsylvania Retailers Association has not averred that it is a customer or the rate schedule under which it is served, therefore, PPL Electric cannot confirm the level of the proposed increase in rates applicable to Complainant.

5. Information concerning the membership of the Pennsylvania Retailers Association is not reasonably available to PPL Electric, and therefore, the averments of Paragraph No. 5 are denied. PPL Electric admits, however, that rates applicable to any members of the Pennsylvania Retailers Association who may be customers of PPL Electric would increase under Supplement No. 38.

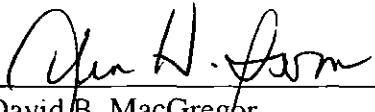
6. The averments of Paragraph No. 6 of the Complaint are denied. To the contrary, PPL Electric's proposed increase in rates is just and reasonable and complies with all applicable provisions of the Public Utility Code.

7. The averments of Paragraph No. 7 of the Complaint are a statement of the Pennsylvania Retailers Association's intent to comply with the schedule established at the prehearing conference in this proceeding on May 19, 2004. PPL Electric agrees that it is appropriate for the Pennsylvania Retailers Association to comply with the schedule that has been established in this proceeding.

The remaining averments of the Complaint are requests for relief to which no response is required.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Pennsylvania Retailers Association be denied.

Respectfully submitted,

  
David B. MacGregor  
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Associate General Counsel  
PPL Services Corporation  
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Fax: 610.774.6726  
E-mail: perussell@pplweb.com

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: August 16, 2004

Attorneys for PPL Electric  
Utilities Corporation



**CERTIFICATE OF SERVICE**

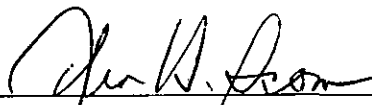
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Pennsylvania Retailers Association, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

James P. Melia  
Kirkpatrick & Lockhart LLP  
240 North Third Street  
Harrisburg, PA 17101-1507

Date: August 16, 2004

  
\_\_\_\_\_  
John H. Isom

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SECRETARY'S BUREAU

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ORIGINAL

Morgan Lewis  
COUNSELORS AT LAW

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jisom@morganlewis.com

September 23, 2004

**VIA HAND DELIVERY**

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

**Re: Christy Meyers v. PPL Electric Utilities Corporation  
Docket No. R-00049255C0019**

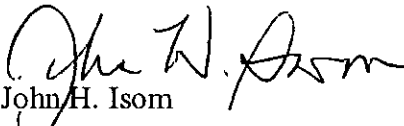
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint," of Christy Meyers in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

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SECRETARY'S BUREAU

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**ORIGINAL**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

Docket No. R-00049255C0019

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**ANSWER TO COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Christy Meyers as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted except that the complete, correct name of the Respondent is PPL Electric Utilities Corporation.
3. In response to Paragraph No. 3 of the Complaint, it is admitted that Ms. Meyers receives electric service from PPL Electric at her home at 178 Crocus Court, Quakertown, Pennsylvania.
4. The averments of Paragraph No. 4 of the Complaint are denied. PPL Electric has not notified any customer of any rate increase effective October 31, 2004, and PPL Electric has not notified any customer that their rates would double. To the contrary, even in PPL Electric's pending base rate proceeding, PPL Electric notified customers receiving service under Rate Schedule Residential Service, that, on a total bill basis, PPL Electric had proposed an increase of 9.67 percent.

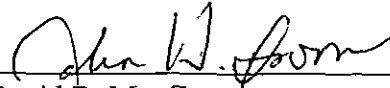
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5. The averments of Paragraph No. 5 of the Complaint are requests for relief, to which no response is required. By way of further response, however, it is noted that Ms. Meyers has requested that rates do not increase by more than 20 percent. As indicated above, PPL Electric's proposed rate increase, on a total bill basis, is only 9.67 percent for customers receiving service under Rate Schedule Residential Service.

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Christy Meyers be denied.

Respectfully submitted,



David B. MacGregor  
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Attorneys for PPL Electric  
Utilities Corporation

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: September 23, 2004



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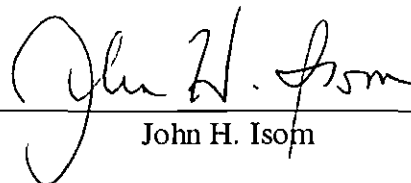
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Christy Meyers, upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

Christy Meyers  
178 Crocus Court  
Quakertown, PA 18953

Date: September 23, 2004

  
\_\_\_\_\_  
John H. Isom

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Morgan, Lewis & Bockius LLP  
One Commerce Square  
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Harrisburg, PA 17101-1904  
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ORIGINAL

Morgan Lewis  
COUNSELORS AT LAW

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OCT 04 2004

John H. Isom  
717.237.4022  
jisom@morganlewis.com

OCTOBER 1, 2004

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

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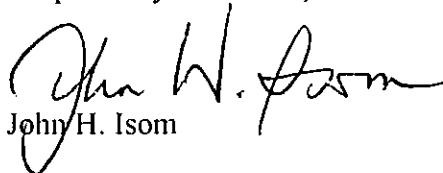
**Re: Margaret M. Stuski v. PPL Electric Utilities Corporation  
Docket No. R-00049255C0011**

Dear Secretary McNulty:

The purpose of this letter is to inform the Commission that PPL Electric Utilities Corporation concurs with the Initial Decision of Administrative Law Judge Allison K. Turner that was dated August 25, 2004 and circulated with correspondence from the Secretary dated September 13, 2004. Therefore, PPL Electric Utilities Corporation will not be filing exceptions to the Initial Decision.

If there are any questions concerning this matter, please contact the undersigned at the addresses or telephone numbers provided above.

Respectfully submitted,



John H. Isom

JHI/jl

Enclosure

c: Certificate of Service

**CERTIFICATE OF SERVICE**

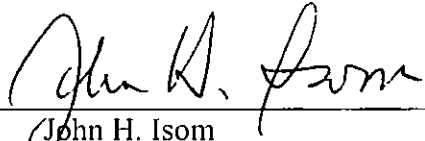
I hereby certify that I have this day served a true copy of the foregoing correspondence upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS**

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

Margaret M. Stuski  
908 Walnut Street  
Wormleysburg, PA 17043

Date: October 1, 2004

  
\_\_\_\_\_  
John H. Isom

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SECRETARY'S BUREAU

Morgan, Lewis & Bockius LLP  
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Morgan Lewis  
COUNSELORS AT LAW

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John H. Isom  
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jisom@morganlewis.com

December 28, 2004

**VIA HAND DELIVERY**

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

**Re: Steven P. Carlyle v. PPL Electric Utilities Corporation**  
**Docket No. R-00049255C0020**

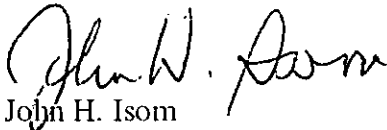
Dear Secretary McNulty:

Enclosed for filing are an original and three (3) copies of the "Answer to Complaint and New Matter" in the above-referenced proceeding.

As indicated on the certificate of service, copies have been served on Administrative Law Judge Turner and the Complainant.

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

Respectfully submitted,

  
John H. Isom

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JHI/jl

Enclosures

cc: Certificate of Service

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
Steven P. Carlyle :

v. :

Docket No. R-00049255C0020

PPL Electric Utilities Corporation :

**ANSWER TO COMPLAINT AND NEW MATTER**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Steven P. Carlyle as follows:

**ANSWER**

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted except that the complete, proper name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are admitted.
4. In Paragraph No. 4 of the Complaint, Mr. Carlyle protests PPL Electric's proposed increase in rates because he is on a fixed income and because, in his opinion, the increase would be a hardship for him. Such averments are denied. Information concerning Mr. Carlyle's personal financial circumstances is not reasonably available to PPL Electric, and therefore, such averments are denied. In further response, PPL Electric has proposed a relatively modest increase in rates for Rate Schedule RS, under which most residential customers are served, which, if approved in full, would increase rates

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only 9.67 percent. This proposed increase in rates follows a twenty-year period of rate stability.

5. The averments of Paragraph No. 5 of the Complaint are requests for relief, to which no response is required.

**NEW MATTER**

6. Mr. Carlyle's Complaint is dated October 20, 2004. Evidentiary hearings in this proceeding, however, concluded on August 13, 2004.

7. Public input hearings were held on various days from June 28, 2004 through August 13, 2004.

8. The ALJ's Recommended Decision is dated October 21, 2004.

9. The time for filing of Exceptions to the Recommended Decision and Replies to Exceptions has passed. Replies to Exceptions were due to be filed on November 22, 2004.

10. At the Commission's public meeting on December 2, 2004, it adopted an Opinion and Order disposing of all issues in the rate proceeding. The Opinion and Order was entered on December 22, 2004.

11. Mr. Carlyle's Complaint was filed late in the proceeding. It can no longer be adjudicated as part of the rate proceeding because the rate proceeding has been concluded. For these reasons, Mr. Carlyle's Complaint should be dismissed.

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Respectfully submitted,



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Allentown, PA 18101-1179  
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Fax: 610.774.6726  
E-mail: perussell@ppfweb.com

Attorneys for PPL Electric  
Utilities Corporation

Of Counsel:

Morgan, Lewis & Bockius LLP

Date: December 28, 2004



**CERTIFICATE OF SERVICE**

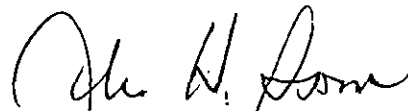
I hereby certify that I have this day served a true copy of the foregoing correspondence and Answer to Complaint of Steven P. Carlyle and New Matter , upon the participant(s), listed below, in accordance with the requirements of §1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAIL**

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

Steven P. Carlyle  
831 Pequia Avenue, Apt. A  
Gap, PA 17527

Date: December 28, 2004

  
\_\_\_\_\_  
John H. Isom

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