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Immor. Ex /
6/29/04
Beth R-00049255
PK

TO: PA PUBLIC UTILITY COMMISSION
AND OTHER INTERESTED PARTIES

DOCKETED

JUL 12 2004

RE: **COMMENTS PRESENTED AT PUBLIC INPUT HEARING
PENNSYLVANIA PUBLIC UTILITY COMMISSION vs.
PPL ELECTRIC UTILITIES CORPORATION
DOCKET NO. R-00049255**

The following relates to PPL's proposed rate increase and is in response to PPL's formal request for comments for the public record as published in local newspapers.

Please find a portion of Pa Public Utility Law, **66 PA C.S. §2807(d)** attached ("Attachment 1").

Section **2807(d)** deals with consumer protections and customer services. It states:

"(PPL) **shall** continue to provide customer service functions consistent with the regulations of the commission, **including**:

- meter readings,
- complaint resolution, and
- **collections**.

Customer services **shall**, at a **minimum**, be maintained at the **same level of quality** under retail competition."

PPL's new policy, initiated in July 2002, contains serious and measurable degradations in the "Level of Quality" of the "Collection Function". This new policy is not in compliance with **66 PA C.S. §2807(d)**.

In particular, PPL's current practice of closing "PPL Collection" and "Authorized Agent Collection" facilities:

1. penalizes customers who must pay their bills with cash (which is "legal tender for all debts, public and private") and those who need a receipt.
2. further penalizes customers by charging them an arbitrary \$1 fee to pay their bills at "Authorized Agent Collection" facilities. This extra charge is also unfair because it is in addition to the "Collection Function" amount already included in PPL's Rates and Tariffs.

Specifically, I ask the PUC to continue to allow PPL adequate income so that they can comply with **66 PA C.S. §2807(d)** of PA Public Utility Law by maintaining the "Collection Function at the same level of quality under retail competition" as practiced prior to July 2002.

Please delay PPL's proposed rate increase until PPL operates in accord with **66 PA C.S. §2807(d)** and takes the following corrective measures:

1. Please ask PPL, and its authorized agents, to issue written receipts when requested. These will serve as "proof of payment" so that customers might be better able to correct confusing bills and computer errors. Receipts were issued by PPL prior to its July 2002 Policy Change at all bank branches now called "Fleet Bank".
2. Please ask PPL to include Authorized Collection Agency costs in its customer's bills, including those of Bill Payment Centers, because Bill Collection costs are an intrinsic cost of providing electric service. Authorized Collection Agency costs were paid by PPL prior to its July 2002 Policy Change. Billing PPL customers separately for the use of Authorized Collection Agencies is a significant decrease in the "Level of Quality" of the "Collection Function" and not allowed by **66 PA C.S. §2807(d)**.
3. Please ask PPL to refund \$1 for each receipt customers were additionally charged since July 2002. Charging for receipts is a serious and measurable degradation in the "Level of Quality" of the "Collection Function". PPL's current policy is not in compliance with **66 PA C.S. §2807(d)**.
4. Please ask PPL to reopen their "Collection Centers". Closing "Collection Centers" is a serious and measurable degradation in the "Level of Quality" of the "Collection Function" and is not in compliance with **66 PA C.S. §2807(d)**.

Thank you for this opportunity to present public comment expressing concern about PPL's unfair and illegal business practices. I am hopeful both PPL and the PA PUC can work to fix these problems. If you need more information, please contact me.

Sincerely



Charles Tommor



Pennsylvania Consolidated Statutes
PUBLIC UTILITIES (TITLE 66)
PART I. PUBLIC UTILITY CODE

Attachment 1

SUBPART D. SPECIAL PROVISIONS RELATING TO REGULATIONS OF PUBLIC UTILITIES
CHAPTER 28. RESTRUCTURING OF ELECTRIC UTILITY INDUSTRY

§ 2807. Duties of electric distribution companies.

(a) General Rule.--Each electric distribution company shall maintain the integrity of the distribution system at least in conformity with the national electric safety code and such other standards practiced by the industry in a manner sufficient to provide safe and reliable service to all customers connected to the system consistent with this title and the commission's regulations. In performing such duties, the electric distribution company shall implement procedures to require all electric generation suppliers to deliver energy to the electric distribution company at locations and in amounts which are adequate to meet the energy supplier's obligations to its customers. Subject to commission approval, the electric distribution company may require that the customer install, at the customer's expense, enhanced metering capability sufficient to match the energy delivered by the electric generation suppliers with consumption by the customer.

(b) Procedures for Review by the Commission.--There shall be a rebuttable presumption that the electric distribution company has the ability to receive energy at all points on its system sufficient to meet the needs of all electric generation suppliers' customers on its system. The electric distribution company shall not have an obligation to install nonstandard facilities, either as to type or location, for the purpose of receiving energy from the energy supplier unless the energy supplier or its customer pays the full cost of these facilities. Nothing in this chapter shall prevent the electric distribution company from upgrading its system to meet changing customer requirements consistent with the requirements of section 1501 (relating to character of service and facilities), and the commission may establish incentive programs to encourage such system upgrades. Disputes concerning facilities shall be subject to the jurisdiction of the commission and may be initiated by the filing of a complaint under section 701 (relating to complaints) by the electric generation supplier or the customer.

(c) Customer Billing.--Subject to the right of an end-use customer to choose to receive separate bills from its electric generation supplier, the electric distribution company may be responsible for billing customers for all electric services, consistent with the regulations of the commission, regardless of the identity of the provider of those services.

1. customer bills shall contain unbundled charges sufficient to enable the customer to determine the basis for those charges.
2. if services are provided by an entity other than the electric distribution company, the entity that provides those services shall furnish to the electric distribution company billing data sufficient to enable the electric distribution company to bill customers.
3. the electric distribution company shall not be required to forward payment to entities providing services to customers, and on whose behalf the electric distribution company is billing those customers, before the electric distribution company has received payment for those services from customers.

(d) consumer protections and customer service.--The electric distribution company shall continue to provide customer service functions consistent with the regulations of the commission, including meter reading, complaint resolution and collections. Customer services shall, at a minimum, be maintained at the same level of quality under retail competition.

1. the commission shall establish regulations to ensure that an electric distribution company does not change a customer's electricity supplier without direct oral confirmation from the customer of record or written evidence of the customer's consent to a change of supplier.
2. the commission shall establish regulations to require each electric distribution company, electricity supplier, marketer, aggregator and broker to provide adequate and accurate customer information to enable customers to make informed choices regarding the purchase of all electricity services offered by that provider. Information shall be provided to consumers in an understandable format that enables consumers to compare prices and services on a uniform basis.
3. prior to the implementation of any restructuring plan under section 2806 (relating to implementation, pilot program and performance-based rates), each electric distribution company, in conjunction with the commission, shall implement a consumer education program informing customers of the changes in the electric utility industry. The program shall provide consumers with information necessary to help them make appropriate choices as to their electric service. The education program shall be subject to approval by the commission.

(e) Obligation to Serve.--An electric distribution company's obligation to provide electric service following implementation of restructuring and the choice of alternative generation by a customer is revised as follows:

1. while an electric distribution company collects either a competitive transition charge or an intangible transition charge or until 100% of its customers have choice, whichever is longer, the electric distribution company shall continue to have the full obligation to serve, including the connection of customers, the delivery of electric energy and the production or acquisition of electric energy for customers.
2. at the end of the transition period, the commission shall promulgate regulations to define the electric distribution company's obligation to connect and deliver and acquire electricity under paragraph (3) that will exist at the end of the phase-in period.
3. if a customer contracts for electric energy and it is not delivered or if a customer does not choose an alternative electric generation supplier, the electric distribution company or commission-approved alternative supplier shall acquire electric energy at prevailing market prices to serve that customer and shall recover fully all reasonable costs.
4. if a customer that chooses an alternative supplier and subsequently desires to return to the local distribution company for generation service, the local distribution company shall treat that customer exactly as it would any new applicant for energy service.

Mackin Ex /
R-00049255
Beth 6/29/04 TX

CONCERNED CITIZENS OF SCHUYLKILL COUNTY, INC.
P.O. BOX 37, MCADOO, PA 18237 email Mackin@Hazleton.net

June 29, 2004

Office of Consumer Advocate
555 Walnut Street 5th Floor Forum Place
Harrisburg, Pa 17101-1923

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Ladies and Gentlemen:

Our group was informed in the fall of 2003 that the PPL was going to the PUC to apply for an increase in January of 2004 and would go into effect in 2005. I was asked if I would be willing to be interviewed about this and I said yes.

I told the interviewer that the members couldn't afford a large increase. McAdoo is going through a sewer project that is not in place as yet, but the residence are paying \$50.00 for a service they do not have, in addition the water rates have gone up substantially. The residents are over 60% senior citizens, whose social security increase in January does not begin to cover any of these increases, let alone their medications.

I told the interviewer that we certainly don't want a power failure, as occurred in 3 states recently, we want our electricity ready and available, however at a reasonable cost.

On September 19, 2003 we experienced a power failure on Tresckow road in McAdoo, This occurred at 5:00 AM, we assumed everyone in the area was without power, however upon calling neighbors we found out people all around us had power, but not the Tresckow road. We all tried calling PPL and could not get through, we found out they (PPL) did not know we were without power. MY QUESTION? WHY DIDN'T THEY KNOW??? After 5 frustrating hours not being able to reach anyone to speak with, I went to the PPL building on POPLAR street in Hazleton, when I arrived and asked to speak to someone, I was told to call the proper office, I told them I tried calling, couldn't get through that's why I was there in person, they ignored me, they were busy with a vendor, getting hoagies for their lunch. I left frustrated. People spent the day calling each other to try to find out what was going on, and when power would be restored. Power was not restored until after 6 PM the hours in between were very inconvent and frustrating . There needs to be a better way to reach someone at PPL to give customers the answers they deserve.

Without power you cannot use your modern phones, you can only use your old fashioned phones, not the ones you can carry, I had to try to find one of the old phones and hook it up. I also have well water, so I could not have water, the stoker stopped and the house was getting cold. I could not cook ,had go out to eat. This covers only part of the problems of that day ,which were difficult for me to handle, I had lost my husband Jim, in June 2003.

Vicki Mackin President ccsc Inc

SECRETARY'S BUREAU

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