



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
Office of Administrative Law Judge
P.O. BOX 3265, HARRISBURG, PA 17105-3265
May 11, 2007

IN REPLY PLEASE
REFER TO OUR FILE

In Re: R-00072155

(SEE ATTACHED LIST)

DOCUMENT FOLDER

Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation

PPL Electric Utilities Corporation filed Supplement No. 54
To Tariff - Electric PA PUC No. 201 proposing a Distribution Only
Rate Increase in the amount of \$83,521,261. or 2.67%.
Number of Customers: 1,382,796. Area Served: Portions of
Berks, Bucks, Carbon, Chester, Clinton, Columbia, Cumberland,
Dauphin, Juniata, Lackawanna, Lancaster, Lebanon, Lehigh,
Luzerne, Lycoming, Monroe, Montgomery, Montour, Northampton,
Northumberland, Perry, Pike, Schuylkill, Snyder, Susquehanna,
Union, Wayne, Wyoming & York Counties. Address of Utility:
2 N. Ninth Street, Allentown, PA 18101.

NOTICE

This is to inform you that an in-person pre-hearing
conference will be held on the above-captioned case as follows:

Type: Initial In-Person Pre-Hearing Conference

Date: Thursday, May 31, 2007

Time: 10:00 a. m.

Location: Hearing Room 3
Plaza Level
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

DOCKETED
MAY 16 2007

Presiding: Administrative Law Judge Susan D. Colwell
PO Box 3265
Harrisburg, PA 17105-3265
Phone: 717.783.5452
Fax: 717.787.0481

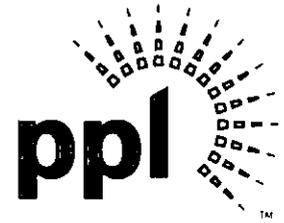
If you are a person with a disability, and you wish to attend the prehearing, we may be able to make arrangements for your special needs. Please call the scheduling office at the Public Utility Commission at least (2) two business days prior to your hearing:

- Scheduling Office: 717.787.1399
- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1.800.654.5988

Pc: Judge Colwell
Ona Lester
Beth Plantz
Docket Section
Calendar File

Paul E. Russell
Associate General Counsel

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



May 14, 2007

FEDERAL EXPRESS

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MAY 14 2007

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

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

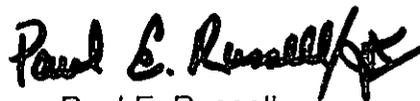
**DOCUMENT
FOLDER**

Dear Mr. McNulty:

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

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

Very truly yours,


Paul E. Russell

Attachment

BTL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATION OF SERVICE

Via FedEx

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MAY 14 2007
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Office of Trial Staff's Interrogatories, Set XVI, Questions OTS-RE-137-D through OTS-RE-142-D, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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

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

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

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

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

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

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

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

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

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

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

Dated: May 14, 2007


Paul E. Russell

Paul E. Russell
Associate General Counsel

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



ORIGINAL

May 17, 2007

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**DOCUMENT
FOLDER**

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MAY 17 2007

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

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

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

Dear Mr. McNulty:

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

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

Very truly yours,

Paul E. Russell

Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

RECEIVED

CERTIFICATION OF SERVICE

MAY 17 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via FedEx

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Office of Consumer Advocate's Interrogatories, Set II, Questions 1 through 15, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

Aron J. Beatty, Esquire
Jennedy E. Santolla, Esquire
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555 Walnut Street
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Harrisburg, Pennsylvania 17101-1923

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Office Of Small Business Advocate
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Office Of Trial Staff
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1051 East Cary Street, Suite 601
James Center III
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Lafayette Morgan
Exeter Associates, Inc.
Suite 310
5565 Sterrett Place
Columbia, MD 21044

Dated: May 17, 2007


Paul E. Russell

Paul E. Russell
Associate General Counsel

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Two North Ninth Street
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perussell@pplweb.com



ORIGINAL

May 18, 2007

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FOLDER**

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MAY 18 2007

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

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

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

Dear Mr. McNulty:

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

Very truly yours,

Paul E. Russell

Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATION OF SERVICE

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MAY 18 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via FedEx

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

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

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

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

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

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

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Wilkes-Barre, PA 18703-1127

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4100 Hillsdale Road
Harrisburg, PA 17112

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

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

Dated: May 18, 2007



Paul E. Russell

DOCUMENT
FOLDER

Paul E. Russell
Associate General Counsel

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



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May 21, 2007

FEDERAL EXPRESS

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

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MAY 21 2007
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Dear Mr. McNulty:

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

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

Very truly yours,

Paul E. Russell
Paul E. Russell

Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATION OF SERVICE

Via FedEx

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MAY 21 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Office of Trial Staff's Interrogatories, Set V, Question OTS-RE-40-D and Set VI, Question OTS-RE-47-D, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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

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

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

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

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PennFuture
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Philadelphia, PA 19102

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

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

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

Dated: May 21, 2007

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

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


Paul E. Russell

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

IRWINA. POPOWSKY
Consumer Advocate

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

May 21, 2007

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

**DOCUMENT
FOLDER**

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

Dear Mr. Russell:

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

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

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

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

SECRETARY'S BUREAU

BTL

2007 MAY 21 PM 3:57

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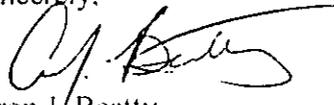
Mr. Paul E. Russell

Page 2

May 21, 2007

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

Sincerely,



Aron J. Beatty

Assistant Consumer Advocate

PA Attorney I.D. # 86625

Enclosures

cc: All parties of record
93914 JAMES McNULTY / certificate

CERTIFICATE OF SERVICE

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

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

Dated this 21st day of May 2007.

SERVICE BY E-MAIL AND INTEROFFICE MAIL

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

RECEIVED
 2007 MAY 21 PM 3:57
 PPL
 SECRETARY'S BUREAU

SERVICE BY E-MAIL and FIRST CLASS MAIL

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

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

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

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

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



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

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

00093436

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

Charles McPhedran
Senior Attorney
PennFuture
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Philadelphia, PA 19102
Counsel for: *PennFuture*

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

Paul E. Russell
Associate General Counsel

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Tel. 610.774.4254 Fax 610.774.6726
perussell@pplweb.com



May 22, 2007

ORIGINAL

**DOCUMENT
FOLDER**

FEDERAL EXPRESS

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

RECEIVED

MAY 22 2007

Re: **Pennsylvania Public Utility Commission** **PA PUBLIC UTILITY COMMISSION**
v. **SECRETARY'S BUREAU**
PPL Electric Utilities Corporation
Docket No. R-00072155

Dear Mr. McNulty:

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

Very truly yours,

Paul E. Russell

Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATION OF SERVICE

Via FedEx

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MAY 22 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

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

Steven Gray, Esquire
Office Of Small Business Advocate
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Lafayette Morgan
Exeter Associates, Inc.
Suite 310
5565 Sterrett Place
Columbia, MD 21044

Dated: May 22, 2007



Paul E. Russell

**BEFORE THE
Pennsylvania Public Utility Commission**

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

**Prehearing Memorandum of
Eric Joseph Epstein, *Pro se***

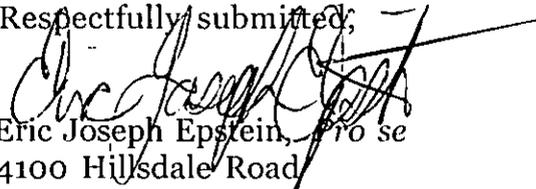
The Honorable Susan D. Colwell
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
PO Box 3265
Harrisburg, PA 17105-3265

ORIGINAL

Dear Judge Colwell:

Eric Joseph Epstein ("Epstein" or "Mr. Epstein") hereby submits this Pre hearing Memorandum in the above-captioned proceeding. Mr. Epstein intends to fully participate in this proceeding as an "active" party. Mr. Epstein also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions and reply exceptions, if necessary.

**DOCUMENT
FOLDER**

Respectfully submitted,

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

DATE: May 22, 2007

DOCKETED
MAY 23 2007

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2007 MAY 23 AM 8:29
SECRETARY'S BUREAU

I. History of the Proceeding

1) On March 29, 2007, PPL Electric Utilities Corporation ("PPL" or "the Company") filed Supplement No. 54 to Tariff-Electric-Pa. PUC No. 201 with the Pennsylvania Public Utility Commission ("PUC" or "Commission") to become effective on June 1, 2007.

2) The Company filed the proposed increase in the Company's distribution base rates under Section 1308 of the Public Utility Code, 66 Pa.C.S.A. § 1308.

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

4) PPL's proposed rate increase request of \$83.6 millions is a 2.7% increase in the Company's annual rates.

5) The proposed rate increase would increase the averaged residential electric electric bill (assuming a 1,000 Kwh consumption level) by 6.8% or \$6.62 a month.

6) PPL increased distribution rates by 6 percent in 2005.

7) Eric Joseph Epstein's ("Epstein" or "Mr. Epstein") filed a Complaint in the above-referenced proceeding on April 25, 2007.

8) Mr. Epstein's Complaint was directed against the rates, terms, and provisions contained in the Company's proposed rate increase in retail distribution rates.

II. Statement of Issues

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

- a) The amount of the requested rate increase is just and appropriate;
- b) The expenses claimed by PPL were prudently incurred;
- c) PPL's proposed rate structure and rate design are appropriate;
- d) The allocation of the proposed distribution rate increase between and among customer classes is just, reasonable and nondiscriminatory;
- e) The rate of return on equity proposed by PPL and other aspects of the Company's proposal result in a fair rate of return;
- f) PPL's cost and quality of service is accurate, legitimate and appropriately allocated;
- g) Appropriateness and accuracy of PPL's accounts, depreciation accruals and accrued deprecations and annual amortization rates;
- h) Reconciliation of PPL's accounts, depreciation accruals and accrued deprecations and annual amortization rates to ensure consistency the Company's Revenue Neutral Reconciliation Tax Assessments in terms of accounts, depreciation accruals and accrued deprecations and annual amortization rates;
- i) Value of building permits and value of replacement parts;
- j) Cost sharing, responsibilities, liabilities and cost burdens associated with environmental remediation;
- k) Maintaining and promoting public service, conservation, community and economic development and middle-income programming; and,
- l) Cost sharing for expenses related to implementation of reliability standards; substation voltage interruptions, transmission line and grid "disturbances"; security staffing levels, and payment for stationing of the National Guard and Pennsylvania State Police.

9) Eric Joseph Epstein anticipates pursuing these issues during this proceeding, and reserves the right to raise and address other issues of concern, and to respond to issues raised by other parties.

III. Proposed Witnesses

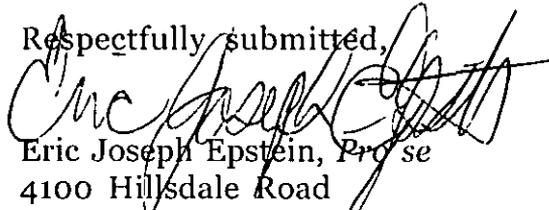
10) Mr. Epstein respectfully reserves the right to modify or supplement his witness list during the course of this proceeding. In the event that Eric Joseph Epstein decides to modify or supplement his witness list, Epstein will inform the parties and the Administrative Law Judge ("ALJ").

IV. Proposed Schedule & Discovery Rules

11) Mr. Epstein will fully cooperate with the Court and the Parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any ALJ directives; including the schedule and timing of Public Input Hearings.

V. Settlement Discussions

12) Eric Joseph Epstein is willing to participate in Settlement discussions and negotiations with the other parties to resolve all outstanding issues in this proceeding.

Respectfully submitted,

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

Dated: May 22, 2007

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the active participants named below by US mail or hand delivery or electronic transmission in accordance with the requirements of Section 1.54.

Judge Susan D. Colwell
PA PUC - Office of ALJ
Commonwealth Keystone Building
400 North Street
Harrisburg, Pa 17120
scolwell@pa.state.us

John H. Isom, Esquire
PPL c/o
Post & Schell
17 North Second St., Floor 12
Harrisburg, Pa 17101-1601
jisom@postschell.com

Paul E. Russell, Esquire
PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101-1179
610-774-4254
perussell@pplweb.com

James Mullins, Esquire
Tanya McCloskey, Esquire
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1921
717-783-5048
jmullins@paoca.org
tmccloskey@paoca.org

David B. MacGregor, Esquire
PPL c/o
Post & Schell, P.C.
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

Kenneth L. Mickens, Esquire
PA Public Utility Commission
Office of Trial Staff
P.O. Box 3265
Harrisburg, PA 17105-3265
717-787-1976
kmickens@state.pa.us

Steven Gray, Esquire

RECEIVED
2007 MAY 23 AM 8:29
SECRETARY'S BUREAU

Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
717-783-2525
sgray@state.pa.us

George Jogovic, Jr., Esquire
PennFuture
425 Sixth Avenue, Suite 2770
Pittsburgh, PA 15219
412-258-6684
jagovic@pennfuture.org

David M. Kleppinger, Esquire
Pamela C. Polacek, Esquire
Adam L. Benschhoff, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
717-232-8000
dkleppinger@mwn.com
ppolacek@mwn.com
(PPL Industrial Customer Alliance)

Kent Murphy, Esquire
Adrian Newall, Esquire
Exelon Business Services Company
2301 Market Street, S-23-1
Philadelphia, PA 19103
215-841-4941
kent.murphy@exeloncorp.com
adrian.newall@exeloncorp.com
(Exelon Corporation, PECO Energy Company,
Exelon Generation Company LLC)

Thomas & Thomas et al
Charles E. Thomas, Jr. Esquire
Thomas T. Niesen, Esquire
212 Locust Street, Suite 500
P. O. Box 9500
Harrisburg, PA 17108
tniesen@ttanlaw.com
(Sustainable Energy Fund of
Central Eastern Pennsylvania)

DATE: May 22, 2007

Paul E. Russell
Associate General Counsel

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



ORIGINAL

May 22, 2007

**DOCUMENT
FOLDER**

FEDERAL EXPRESS

RECEIVED

MAY 22 2007

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

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

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

Dear Mr. McNulty:

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

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

Very truly yours,

Paul E. Russell

Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

RECEIVED

CERTIFICATION OF SERVICE

MAY 22 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via FedEx

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the PP&L Industrial Customer Alliance's Interrogatories, Set I, Question 1 through 8, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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

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

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

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

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

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

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

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

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

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

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

Dated: May 22, 2007

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

Paul E. Russell



THOMAS, THOMAS,
ARMSTRONG & NIESEN

Attorneys and Counsellors at Law

THOMAS T. NIESEN
Direct Dial: 717.255.7641
tniesen@ttanlaw.com

May 23, 2007

2007 MAY 23 PM 3:48
SECRETARY'S OFFICE

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

DOCUMENT
FOLDER

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

Dear Secretary McNulty:

Enclosed for filing on behalf of The Sustainable Energy Fund of Central Eastern Pennsylvania are an original and three (3) copies of its Petition to Intervene in the above matter. Copies of the Petition to Intervene are being served upon the persons and in the manner set forth on the Certificate of Service attached to it.

Very truly yours,

THOMAS, THOMAS, ARMSTRONG & NIESEN

By

Thomas T. Niesen

Encl.

cc: Certificate of Service (w/encl.)
G. Scott Paterno, Esq. (w/encl.)

070522 McNulty (SEF Petition to Intervene).wpd

ORIGINAL

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ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility
Commission

Docket No. R-00072155

v.

PPL Electric Utilities Corporation

2007 MAY 23 PM 3:48
SECRETARY'S OFFICE

DOCUMENT
FOLDER

PETITION TO INTERVENE OF
THE SUSTAINABLE ENERGY FUND OF
CENTRAL EASTERN PENNSYLVANIA

AND NOW, comes The Sustainable Energy Fund of Central Eastern Pennsylvania ("SEF"), by its attorney, and, pursuant to 52 Pa. Code §5.71, *et seq.*, petitions to intervene in the above-captioned proceeding. In support of its intervention, SEF represents as follows:

I. Background

DOCKETED
MAY 23 2007

1. This proceeding concerns PPL Electric Utilities Corporation's ("PPL") Supplement No. 54 to Tariff Electric - Pa. P.U.C. No. 201 filed March 29, 2007. Supplement No. 54 proposes, *inter alia*, to increase annual net distribution revenue by approximately \$83.6 million or 13 percent based on a future test year ending December 31, 2007.

2. SEF is a Pennsylvania corporation established upon the conclusion of PPL's Restructuring Proceeding and pursuant to the terms of the Joint Settlement of that Proceeding approved by Commission Order of the Public Utility Commission ("Commission") entered August 27, 1998, at Docket No. R-00973954. SEF's mission is to promote, research, and invest in clean and renewable energy technologies, energy conservation, energy efficiency, and sustainable energy enterprises that provide opportunities and benefits for PPL ratepayers.

3. SEF's address is as follows:

The Sustainable Energy Fund of
Central Eastern Pennsylvania
968 Postal Road
Allentown, PA 18109

4. The name, address and telephone numbers of SEF's attorney are:

Thomas T. Niesen
PA Attorney ID No. 31379
THOMAS, THOMAS, ARMSTRONG & NIESEN
Suite 500
212 Locust Street
P.O. Box 9500
Harrisburg, PA 17108-9500
717.255.7641 (voice)
717.236.8278 (fax)
tniesen@ttanlaw.com (email)

II. Commission Regulations Re Intervention

5. Section 5.72 of the Commission's Rules and Regulations, 52 Pa. Code §5.72, provides as follows:

§ 5.72. Eligibility to intervene.

(a) *Persons.* A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

- (1) A right conferred by statute of the United States or of the Commonwealth.
- (2) An interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.
- (3) Another interest of such nature that participation of the petitioner may be in the public interest.

6. Section 5.73 of the Commission's Rules and Regulations, 52 Pa. Code §5.73, identifies the form and content for petitions to intervene:

5.73. Form and content of petitions to intervene.

(a) Petitions to intervene shall set out clearly and concisely the facts from which the nature of the alleged right or interest of the petitioner can be determined, the grounds of the proposed intervention, and the position of the petitioner in the proceeding, so as fully and completely to advise the participants and the Commission as to the specific issues of fact or law to be raised or controverted.

III. SEF's Interest in This Proceeding

7. SEF's mission, as set forth above, is to promote, research, and invest in clean and renewable energy technologies, energy conservation, energy efficiency, and sustainable energy enterprises that provide opportunities and benefits for PPL ratepayers. In accordance with its mission, SEF is engaged in projects that emphasize renewable energy sources, such as solar and wind power development, clean energy technologies, energy conservation and efficiency, as well as energy education.

8. As explained by PPL President David G. DeCampi in his testimony submitted in support of Supplement No. 54, PPL's rate filing provides it with the opportunity to pursue four objectives including "several new energy efficiency and demand side management ("DSM") initiatives." As addressed at more length in the "Statement of Reasons" also submitted in support of Supplement No. 54, Supplement No. 54 "includes a number of programs to assist the Company's customers and the communities that it serves." These programs include "five new energy efficiency and energy conservation programs" and "additional consumer education regarding the wise use of energy."

9. SEF has an interest in the energy efficiency programs that are proposed for the PPL service territory and consumer education regarding the wise use of energy. That interest includes, *inter alia*, whether the programs and consumer education as proposed are adequate or should be revised or expanded; whether the programs and

consumer education as proposed by PPL are sufficiently funded; and the potential coordination of PPL's proposed programs and consumer education with the programs of SEF. SEF's interest in these matters is not just that of the fund operating in the PPL service territory but also as a consumer of electricity in the PPL service territory.

10. Supplement No. 54 also proposes to eliminate the Sustainable Energy Fund Rider, Page 19K, from the PPL Tariff. Given continuing and increasing interest in renewable energy, energy efficiency, energy conservation and consumer education, it may be appropriate for the Commission to consider further funding for the SEF in this proceeding.

IV. Grounds for Intervention

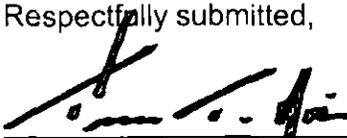
11. SEF's intervention is necessary to ensure the development of a complete record on the reasonableness of the new energy efficiency and energy conservation programs and additional consumer education proposed by PPL. As the entity whose mission it is to promote, research, and invest in clean and renewable energy technologies, energy conservation, energy efficiency and sustainable energy enterprises that provide opportunities and benefits for the PPL ratepayers, SEF has a unique perspective which is not otherwise represented by any other party, which is in the public interest and which should be considered by this Commission. SEF, moreover, has experience and expertise in matters of energy efficiency, energy conservation and consumer education such that its participation in this proceeding would benefit the record. SEF's interest in the programs in the PPL service territory may be directly affected by the Commission's consideration of the programs offered by PPL. As a consumer of electricity, SEF has a further and additional interest in renewable energy, energy efficiency and energy conservation.

V. SEF's Position

12. SEF intends to actively participate in this proceeding by reviewing the several energy efficiency, energy conservation, demand side management and consumer education programs being proposed by PPL. It may propose comments or changes to the programs as proposed by PPL. It may propose additional energy efficiency, energy conservation or consumer education programs. It will also review and may comment on the proposals offered by other parties in response to those supported by PPL. In response to the proposal of PPL to eliminate the Sustainable Energy Fund Rider, Page 19K, from the PPL Tariff, the SEF may ask the Commission to consider further funding for the SEF in this proceeding.

WHEREFORE, The Sustainable Energy Fund of Central Eastern Pennsylvania prays that the Pennsylvania Public Utility Commission grant its Petition to Intervene in the proceeding at Docket No. R-00072155.

Respectfully submitted,



Thomas T. Niesen
PA Attorney ID No. 31379
THOMAS, THOMAS, ARMSTRONG & NIESEN
212 Locust Street, Suite 500
P.O. Box 9500
Harrisburg, PA 17108-9500

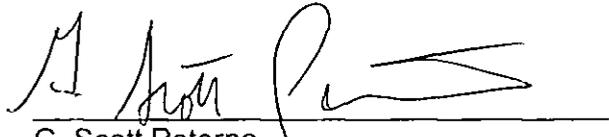
Attorney for
The Sustainable Energy Fund of
Central Eastern Pennsylvania

DATED: May 23, 2007

SEF Petition to Intervene (Final).wpd

VERIFICATION

I, G. Scott Paterno, Member of the Board of Directors of the Sustainable Energy Fund of Central Eastern Pennsylvania, hereby state that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect the Sustainable Energy Fund of Central Eastern Pennsylvania to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



G. Scott Paterno
The Sustainable Energy Fund
of Central Eastern Pennsylvania

2007 JUL 23 PM 3:48
SECRETARY'S OFFICE

ORIGINAL

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility
Commission**

:
:
:
:
:
:
:

Docket No. R-00072155

v.

PPL Electric Utilities Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this 23rd day of May, 2007, served a true and correct copy of the Petition to Intervene of the Sustainable Energy Fund of Central Eastern Pennsylvania, upon the persons and in the manner set forth below:

FIRST CLASS MAIL, POSTAGE PREPAID

Office of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P. O. Box 3265
Harrisburg, PA 17105-3265

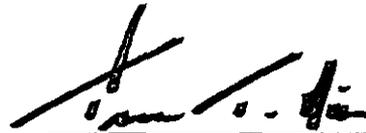
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

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

Paul E. Russell
Assistant Counsel
Regulatory Affairs
PPL Utilities Corporation
Two North Ninth Street
Allentown, PA 18101

David B. MacGregor, Esquire
Post & Schell
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808

2007 MAY 23 PM 3:48
SECRETARY'S BUREAU



Thomas T. Niesen
PA Attorney ID No. 31379



OFFICE OF CONSUMER ADVOCATE

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

RWINA. POPOWSKY
 Consumer Advocate

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

May 24, 2007

RECEIVED

MAY 24 2007

PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

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

**DOCUMENT
 FOLDER**

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

Dear Mr. Russell:

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

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

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

Lafayette Morgan
 Exeter Associates, Inc.
 Suite 310
 5565 Sterrett Place
 Columbia, MD. 21044
 E-mails: lmorgan@exeterassociates.com

Mr. Paul E. Russell

Page 2

May 24, 2007

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

Sincerely,


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

Enclosures

cc: All parties of record

93724 JAMES McNULTY / Certificate

CERTIFICATE OF SERVICE

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

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

Dated this 24th day of May 2007.

SERVICE BY E-MAIL AND INTEROFFICE MAIL

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

SERVICE BY E-MAIL and FIRST CLASS MAIL

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

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

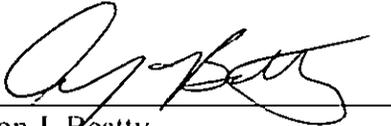
David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103
Counsel for: *PPL Electric Utilities Corporation*

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

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

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

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



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

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

BURKE VULLO REILLY ROBERTS

ATTORNEYS AT LAW

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

*Formerly Burke & Burke
Thomas F. Burke, Sr. (1952-1972)*

JOSEPH L. VULLO
jlvullo@bvrrlaw.com

www.bvrrlaw.com

May 24, 2007

ORIGINAL

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

**DOCUMENT
FOLDER**

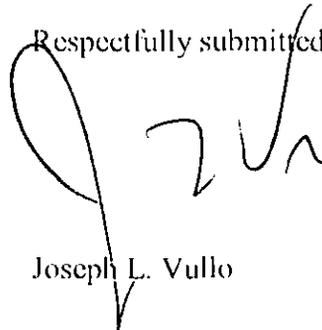
RE: In Re: PPL Electric Utilities Corporation for Rate Increase
Docket No: R-00072155

Dear Secretary McNulty:

Enclosed for filing please find an original and two (2) copies of the Prehearing Memorandum of the Commission on Economic Opportunity. I have served all parties of record in accordance with the enclosed Certificate of Service

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

Respectfully submitted,



Joseph L. Vullo

JLV/jar
encls.

cc: All Parties of Record
Susan D. Colwell - Office of ALJ

RECEIVED
2007 MAY 29 AM 9:11
SECRETARY'S BUREAU

140

ORIGINAL

RECEIVED

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION 2007 MAY 29 AM 9: 11

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

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

**PREHEARING MEMORANDUM OF
THE COMMISSION ON ECONOMIC OPPORTUNITY**

I. INTRODUCTION

The Intervenor, Commission on Economic Opportunity (CEO), is a not-for-profit corporation with its principal office located in Wilkes-Barre, Luzerne County, Pennsylvania. CEO has been directly involved in helping its clients' - the low income population of Luzerne County - deal with rising utility costs through counseling, advice, payment assistance and energy conservation measures. As a representative of its clients relative to utility issues, CEO has been granted intervention in numerous restructuring and rate request proceedings before the Pennsylvania Public Utility Commission. CEO has been granted active party status in prior PPL Electric cases; PG Energy's recent application for a rate increase; and UGI's application to acquire PG Energy. CEO also participated in those Companies' restructuring cases.

On April 5, 2007, CEO filed its Petition to Intervene in the above matter as a representative of its clients who are customers of PPL Electric. In its Petition to Intervene, CEO indicated that its participation in the matter was in large part to study the effect of the proposed rate increase on PPL's customers and to address whether the Company's universal service programs are appropriately funded and available.

II. ISSUES TO BE PRESENTED BY CEO

CEO expects to address the following issues in this matter:

1. Whether the Company's universal service programs are appropriately funded and available and whether those programs will remain appropriately funded and available if the request for a rate increase is granted.
2. The effect of any proposed rate increase on the residential customer class, and particularly low income customers.

CEO reserves the right to address other issues that may arise during the discovery process.

III. WITNESSES

CEO, at this time, intends to present the written direct testimony of its Executive Director, Eugene M. Brady, 163 Amber Lane, Wilkes-Barre, Pennsylvania and that testimony will address the issues outlined in Section II above.

IV. SETTLEMENT

CEO is prepared to discuss a possible settlement in this matter.

Respectfully submitted,

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the Prehearing Memorandum of the Commission on Economic Opportunity upon the following participants this 24th day of May, 2007, via first-class mail and electronic mail:

Paul E. Russell, Esquire
PPL Services Corporation
Office of General Counsel
Two North Ninth Street
Allentown, PA 18106

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

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

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

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

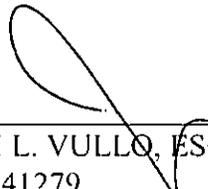
Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

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

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

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

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2007 MAY 29 AM 9:12
PA.P.U.C.
SECRETARY'S BUREAU



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

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

IRWIN A. POPOWSKY
Consumer Advocate

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

May 25, 2007

RECEIVED

MAY 31 2007

Honorable Susan D. Colwell
Administrative Law Judge
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

DOCUMENT
FOLDER

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Pennsylvania Public Utility Commission

v.

PPL Electric Utilities Corporation

Base Rate Proceeding

Docket No. R-00072155

Dear Judge Colwell:

Enclosed please find the Office of Consumer Advocate's Prehearing Memorandum in the above-captioned proceeding.

Copies have been served upon all parties of record as shown on the attached Certificate of Service.

Sincerely,

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

Enclosures

cc: All parties of record
*94168

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OFFICE OF CALL J.
07 MAY 29 AM 8:38
PA PUC

II. ISSUES AND SUB-ISSUES

Based upon a preliminary analysis of PPL's base rate increase filing, the OCA has compiled a list of issues which it anticipates will be included in its investigation of this rate request. It is anticipated that other issues may arise and may be pursued once the answers to all of the OCA's interrogatories have been received and analyzed.

The OCA has served six sets of interrogatories to date. Upon receipt of the answers to those interrogatories, the OCA may then be able to narrow the scope of additional information requests. Once the discovery process has been completed, the OCA will file direct testimony which will set forth the specific issues to be addressed in this proceeding. At that time, the OCA will also be able to make and to quantify its specific recommendations.

The following list sets forth the issues, at this time, the OCA anticipates it may raise.

A. Rate of Return

1. Cost of Common Equity: The OCA will perform a detailed analysis of the cost of common equity claimed by PPL. Also, the OCA will carefully examine the Company's methodologies and supporting data used to develop its final cost of common equity claim.

2. Capital Structure: The OCA will examine whether the capital structure claimed by PPL is representative of the period in which rates will be in effect and is otherwise appropriate for ratemaking purposes.

3. Embedded Cost of Debt and Preferred Stock: The OCA will examine the embedded cost of debt and preferred stock.

B. Rate Base/Measure of Value

The OCA will examine the reasonableness of the Company's filing as it relates to rate base/measures of values, including the following areas:

- the Company's plant in service claims in order to determine whether the plant claimed is used and useful in providing utility service
- the Company's claim for cash working capital
- the Company's proposal to recover a return on land held for future use in current rates

C. Revenue and Expenses

The OCA will examine the reasonableness of the Company's filing as it relates to revenues and expenses, including the following areas:

- the sales forecast utilized by the Company in order to project future test year sales and revenues
- PPL's proposed depreciation expense (including the depreciation study, service life study and application of the straight-line remaining life method)
- the Company's rate case expense, labor expense, and advertising expense
- inter-company charges due to the fact that PPL has been allocated a share of its parent company's overhead and shared costs
- PPL's affiliate charges, e.g., rents, fees or charges which were assessed for the use of PPL Electric's lines to provide internet, communication or entertainment services
- salaries of PPL employees, including executive compensation

D. Rate Structure/Cost of Service/Rate Design

1. The OCA will examine the Companies' proposed distribution of the revenue increase among customer classes.

2. The OCA will examine the Company's proposed customer charge.

3. The OCA will examine whether the rate design proposed by the Company is reasonable and appropriate.

4. The OCA will examine the cost of service study, including the methodology used and the reasonableness of the allocations.

5. The OCA will examine the reasonableness and appropriateness of the Company's proposed tariff changes.

6. The OCA will examine the proposed Transmission Charges to ensure that they are proper for each customer class.

III. WITNESSES

The OCA intends to present the direct, rebuttal, and surrebuttal testimony, as may be necessary, of the following witnesses in this proceeding. The witnesses will present testimony in written form and will also attach various exhibits, documents, and explanatory information which will assist in the presentation of the OCA's case. In order to expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be mailed directly to the expert witnesses responsible for the area of the case, as well as mailing a copy to counsel for the OCA.

A. Rate Base, Revenues, Expenses, and General Accounting

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

Columbia, MD 21044
Telephone: 410-992-7500
Fax: 410-992-3445
E-mail: lmorgan@exeterassociates.com

B. Rate Structure

Richard Galligan
Exeter Associates, Inc.
5565 Sterrett Place
Suite 310
Columbia, MD 21044
Telephone: 410-992-7500
Fax: 410-992-3445
E-mail: rgalligan@exeterassociates.com

C. Rate of Return

David Parcell
Technical Associates, Inc.
1051 East Cary Street, Suite 601
James Center III
Richmond, VA 23219
Telephone: 804-644-4000
Fax: 804-644-7055
Email: david.parcell@tai-econ.com

The OCA specifically reserves the right to call additional witnesses, as necessary. As soon as the OCA has determined whether an additional witness or witnesses will be necessary for any portion of its case, the presiding Administrative Law Judge and all parties of record will be notified.

IV. SERVICE ON THE OCA

The OCA will be represented in this case by Assistant Consumer Advocates Aron J. Beatty and Jennedy E. Santolla. Two copies of the documents should be served on the OCA as follows:

Aron J. Beatty
Jennedy E. Santolla
Office of Consumer Advocate

555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Telephone: (717) 783-5048
Fax: (717) 783-7152
E-mail: abcatty@paoca.org
jsantolla@paoca.org

V. DISCOVERY

Because the time period for discovery and preparation of testimony is limited, the OCA supports a shortened discovery response time in this proceeding. The OCA, therefore, requests the following modifications, which were approved in the 2004 PPL base rate proceeding, to the discovery regulations:

- A. Answers to written interrogatories be served in-hand within ten (10) calendar days of service of the interrogatories.
- B. Objections to interrogatories be communicated orally within three (3) days of service; unresolved objections be served to the ALJ in writing within five (5) days of service of interrogatories.
- C. Motions to dismiss objections and/or direct the answering of interrogatories be filed within three (3) days of service of written objections.
- D. Answers to motions to dismiss objections and/or direct the answering of interrogatories be filed within three (3) days of service of such motions.
- E. Rulings over such motions be issued, if possible, within seven (7) days of filing of the motion.

- F. Responses to requests for document production, entry for inspection, or other purposes be served in-hand within ten (10) calendar days.
- G. Requests for admission be deemed admitted unless answered within ten (10) days or objected to within five (5) days of service
- H. Answers to on-the-record data requests be served in-hand within seven (7) calendar days of the request.

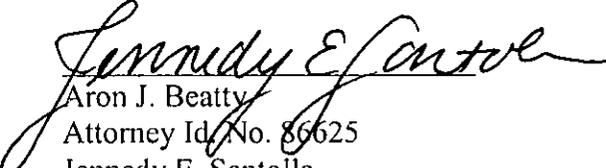
VI. PUBLIC INPUT HEARINGS

The OCA requests that public input hearings be held throughout the Company's service territory. The OCA has received several requests for public input hearings through its Customer Call Center. At this time, the OCA has received requests for public input hearings principally from the areas of Wilkes-Barre/Scranton and Allentown/Bethlehem. In PPL's last base rate case, public input hearings were held in Harrisburg, Wilkes-Barre, Scranton, Allentown, Lancaster, Williamsport, and Bethlehem. The OCA proposes the scheduling of public input hearings, at a minimum, in the Wilkes-Barre/Scranton and Allentown/Bethlehem regions. Due to the size of PPL's service territory, the OCA would also support the scheduling of hearings in Harrisburg, Lancaster, and Williamsport in order to provide a reasonable opportunity for customers to testify. The OCA reserves the right to update the proposed locations for public input hearings as more information becomes available.

VII. PROPOSED SCHEDULE

The OCA's supports the schedule agreed upon by the parties that was previously circulated to the ALJ by email.

Respectfully submitted,



Aron J. Beatty
Attorney Id. No. 86625

Jennedy E. Santolla
Attorney Id. No. 203098
Assistant Consumer Advocates

Counsel for:
Irwin A. Popowsky

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923
Telephone: 717-783-5048
Fax: 717-783-7152

DATED: May 25, 2007

94063.doc

CERTIFICATE OF SERVICE

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

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

Dated this 25th day of May 2007.

SERVICE BY E-MAIL AND INTEROFFICE MAIL

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

SERVICE BY E-MAIL and FIRST CLASS MAIL,

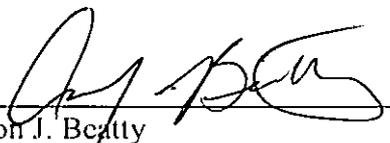
Paul E. Russell
Associate General Counsel
PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101-1179
Counsel for: *PPL Electric Utilities Corporation*

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

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

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

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



Aron J. Beatty
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Jennedy E. Santolla
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Counsel for:
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Fax: (717) 783-7152 00093436

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

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

Eric J. Epstein, Esq.
4100 Hillsdale Road
Harrisburg, PA 17112



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717-731-1970 Main
717-731-1985 Fax
www.postschell.com

John H. Isom

jisom@postschell.com
717-612-6032 Direct
File #: 2507-131149

May 25, 2007

VIA HAND DELIVERY

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

ORIGINAL

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

**DOCUMENT
FOLDER**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Prehearing Memorandum of PPL Electric Utilities Corporation in the above-referenced proceeding. As indicated on the certificate of service, copies have been served on the parties in the manner indicated.

Respectfully submitted,

John H. Isom

JHI/jl

Enclosures

cc: Certificate of Service

SECRETARY'S BUREAU

2007 MAY 25 PM 2:46

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION :
v. : Docket No. R-00072155
PPL ELECTRIC UTILITIES :
CORPORATION :

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SECRETARY'S BUREAU

PREHEARING MEMORANDUM OF
PPL ELECTRIC UTILITIES CORPORATION

DOCUMENT
FOLDER

To Administrative Law Judge Susan D. Colwell:

On March 29, 2007, PPL Electric Utilities Corporation ("PPL Electric") filed Supplement No. 54 to Tariff – Electric Pa. P.U.C. No. 201, as well as substantial supporting data. Therein, PPL Electric proposed a general increase in rates to become effective on June 1, 2007.¹ The general increase in rates is designed to produce approximately \$83.6 million of additional annual operating revenues based upon a future test year ending December 31, 2007.

On May 11, 2007, the Pennsylvania Public Utility Commission ("Commission") scheduled a prehearing conference in this proceeding to be held on May 31, 2007. Also, on May 11, 2007, Administrative Law Judge Susan D. Colwell ("ALJ") issued a Prehearing Conference Order. Therein, the ALJ requested, among other things, that the parties submit prehearing conference memoranda for consideration at the prehearing conference. This Prehearing Conference Memorandum is being submitted by PPL Electric in compliance with the ALJ's Prehearing Order.

ISSUES

DOCKETED
MAY 30 2007

As part of its direct case, PPL Electric will present the following witnesses who will testify as to the matters explained in the following prefiled statements and exhibits:

¹ Under Section 1308(d) of the Public Utility Code, 66 Pa.C.S.A. § 1308(d), the effective date of Supplement No. 54 is suspended by operation of law for up to seven months, or January 1, 2008.

David G. DeCampi	Statement No. 1	Current Financial Condition, Management Effectiveness, and Perspective on the Filing.
Joseph R. Schadt	Statement No. 2	2007 Operating Budgets and 2006 Actual Results of Operations.
Denise A. Cunningham	Statement No. 3	Rate Base and Revenue and Expense Adjustments.
David R. Woodruff	Statement No. 4	Sales Forecast, Annualization of Sales and Revenue, and Load Research
Douglas A. Krall	Statement No. 5	Demand Side Response (“DSR”), Automated Meter Reading, Capital Budgets, and Rate Design.
Joseph M. Kleha	Statement No. 6	Class Cost Allocation Studies, Cash Working Capital, Taxes, Expense Adjustments, and Cost Recovery Mechanisms.
Oliver G. Kasper	Statement No. 7	Specific Rate Design, Class Revenue Allocation, Tariff Rules, Proofs of Revenue and Pro Forma Revenue Adjustments.
Timothy R. Dahl	Statement No. 8	Universal Service Programs, Sustainable Development Program.
Robert T. Homa	Statement No. 9	DSR Programs
John J. Spanos	Statement No. 10	Depreciation Service Life Study.
Paul R. Moul	Statement No. 11	Cost of Common Equity, Capital Structure, Embedded Cost of Debt and Preferred Capital and Fair Rate of Return.
Julie M. Cannell	Statement No. 12	Cost of Common Equity, Investor Perspective.

PPL Electric is unable to provide further identification of the issues at this time because the issues that will be litigated in this proceeding initially will be identified by other parties.

PPL Electric notes, however, that the Company's 2004 base rate proceeding, at Docket No. R-00049255, has been remanded by the Pennsylvania appellate courts to the Commission for further proceedings. The results of that proceeding on remand may affect the rate design in this case, but it will not affect PPL Electric's revenue requirement claim in this proceeding.

PPL Electric may present additional witnesses, testimony and exhibits on matters arising during the course of the proceeding, including matters raised by other parties.

SETTLEMENT

PPL Electric stands ready to enter into settlement discussions with the other parties on all issues. For example, the proposed schedule which is provided as Attachment A hereto reserves a specific date, June 14, 2007, for settlement discussions. It is premature, however, to predict the likelihood of achieving either an overall settlement or settlement of any issues because the proceeding is in its early stages.

PROPOSED SCHEDULE

PPL Electric is providing as Attachment "A" hereto a proposed schedule that is the result of negotiations among the principal parties. The proposed schedule represents compromises by all parties and is not a schedule that any party would have proposed on its own. PPL Electric believes that the proposed schedule is fair to all parties, given the statutory limitation on the length of time for the Commission to adjudicate proposed general increases in base rates.

DISCOVERY SCHEDULE

PPL Electric believes that the opportunity for discovery should continue through the proceeding until the close of the evidentiary record. PPL Electric believes that it would be inappropriate for the discovery schedule to be accelerated due to the substantial amount of discovery that has been propounded to PPL Electric. To date, 21 sets of discovery requests containing more than 522 separate questions have been served upon PPL Electric. The Company will continue to respond to discovery requests as rapidly as possible.

PUBLIC INPUT HEARINGS

PPL Electric believes that four public input hearings should be sufficient to provide customers with a reasonable opportunity to express their views regarding this proceeding. Public input hearings should be held over four days in the afternoon and evening in the four principal population centers of PPL Electric's service territory, Allentown/Bethlehem, Lancaster/Harrisburg, Wilkes-Barre/Scranton and Williamsport. PPL Electric suggests that any public input hearings be held relatively early in the proceeding so that PPL Electric will have a reasonable opportunity to respond to any issues raised by customers.

Respectfully submitted,



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Four Penn Center
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Voice 215.587.1197
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John H. Isom
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E-mail:mgang@postschell.com
jisom@postschell.com
mhassell@postschell.com

Of Counsel:

Post & Schell, P.C.

Date: May 25, 2007

Paul E. Russell
Associate General Counsel
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Voice: 610.774.4254
Fax: 610.774.6726
E-mail:perussell@pplweb.com

Attorneys for PPL Electric
Utilities Corporation

ATTACHMENT A

PROPOSED SCHEDULE
FOR THE 2007 BASE RATE

<i>Prehearing Conference</i>	May 31
Informal Discovery in Allentown	June 7-8
Settlement Discussions	June 14
Public Input Hearings	June 21-29
Other Parties' Cases-in-Chief	July 6*
Rebuttal	July 27*
Surrebuttal	August 8*
Hearings	August 13-14, 16-17
Main Brief	September 5*
Reply Brief	September 17*

Each date marked with a * is a date on which documents are due. For parties accepting electronic service, the documents are to be served electronically on the date indicated by 4:00 p.m. Hard copies will follow by first class mail or an express service. For parties not accepting electronic service, documents are due in hand on the following business day.

2007 MAY 25 PM 2:49
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

Honorable Susan D. Colwell
Administrative Law Judge
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105

Tanya J. McCloskey
Aron J. Beatty
Jennedy C. Santolla
Office of Consumer Advocate
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Harrisburg, PA 17101-1923

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

Kenneth Mickens
Charles Daniel Shields
Office of Trial Staff
PO Box 3265
Commonwealth Keystone Building
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Harrisburg, PA 17105-3265

Pamela C. Polacek
Vasiliki Karandrikas
McNees, Wallace & Nurick
PO Box 1166
100 Pine Street
Harrisburg, PA 17108-1166

Date: May 25, 2007

Andrew T. Bosak
343 S. Second Street
Steelton, PA 17113

Daniel D. Graham
217 N. Second Street
Harrisburg, PA 17101

Stephanie Crayton
460 E. Central Avenue
South Williamsport, PA 17702

Judith A. Lewis-Walton
777 Walnut Street
Pottsville, PA 17901

Margaret Gay
23 W. Bergh Street
Plains, PA 18705

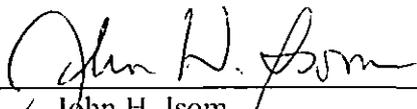
Eric Joseph Epstein
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Craig A. Doll
25 West Second Street
P.O. Box 403
Hummelstown, PA 17036-0403

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

SECRETARY'S BUREAU

2007 MAY 25 PM 2:46



John H. Isom



McNees Wallace & Nurick LLC
attorneys at law

ORIGINAL

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

May 29, 2007

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

VIA HAND DELIVERY

**DOCUMENT
FOLDER**

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

Dear Secretary McNulty:

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

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

Very truly yours,

McNEES WALLACE & NURICK LLC

By *Vasiliki Karandrikas*
Vasiliki Karandrikas
(PA I.D. No. 89711)

Counsel to PP&L Industrial Customer Alliance

VK/sds
Enclosures
c: Certificate of Service

RECEIVED
MAY 29 PM 2:15

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC
UTILITY COMMISSION

v.

PPL ELECTRIC UTILITIES
CORPORATION

:
:
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:
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:
:

Docket No. R-00072155

**PREHEARING MEMORANDUM
OF PP&L INDUSTRIAL CUSTOMER ALLIANCE**

Pursuant to Administrative Law Judge ("ALJ") Susan D. Cowell's Prehearing Conference Order, dated May 11, 2007, PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Prehearing Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

On March 29, 2007, PPL Electric Utilities Corporation ("PPL" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") Supplement No. 54, proposed to become effective on June 1, 2007. By this filing, PPL requests a distribution rate increase of approximately \$83.6 million, or 13% over the Company's present annual distribution revenues, and a proposed return on equity of 11.5%. If approved, the Company's distribution rate increase would produce an overall rate increase of approximately 2.7%. In support of Supplement No. 54, PPL has filed and served supporting testimony that reports to validate the Company's claim for an \$83.6 million distribution rate increase and the other elements of the Company's proposal.

On April 23, 2007, PPLICA filed a Complaint in the above-captioned proceeding. PPLICA is an ad hoc association of energy-intensive industrial customers receiving electric service in PPL's

service territory. PPLICA members purchase service from PPL primarily under Rate Schedules LP-4, LP-5, LP-6, IS-P, and IS-T, as well as available riders. These Rate Schedules and Rate Schedules LPEP, IS-M and Standby make up the Large Commercial and Industrial ("C&I") Class for purposes of PPL's distribution base rate filing.¹

On May 11, 2007, the PUC scheduled a Prehearing Conference in this proceeding to be held on May 31, 2007.

II. ANTICIPATED ISSUES AND SUB-ISSUES

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

- (a) whether the size of the requested rate increase is appropriate;
- (b) whether the expenses claimed by PPL were prudently incurred;
- (c) whether the allocation of the proposed distribution rate increase between and among customer classes is just, reasonable and non-discriminatory;
- (d) whether PPL's proposed rate structure and rate design are appropriate, just, reasonable and not unduly discriminatory, specifically including the proposed rate design changes for customers on Rate Schedules LP-5, LP-6 and IS-T;
- (e) whether the 11.5% return on equity proposed by PPL and other aspects of the Company's proposal result in a fair rate of return;
- (f) whether PPL's claimed cost of service is accurate, legitimate and appropriately allocated;
- (g) whether PPL's proposed changes to Tariff Rules 4 and 7 are appropriate, just and reasonable; and
- (h) whether PPL's proposed termination of the Interruptible Service by Agreement Rider and Competitive Rate Rider is appropriate, just and reasonable.

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

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

III. PROPOSED WITNESSES

PPLICA will sponsor the testimony of Mr. Stephen J. Baron, J. Kennedy and Associates, Inc., 570 Colonial Park Drive, Suite 304, Roswell, GA 30075. Mr. Baron's areas of testimony will focus on issues pertaining to cost of service, cost allocation, rate design, and PPL's tariff rules and riders. PPLICA reserves the right to modify or supplement this witness list during the course of the proceeding. In the event that PPLICA decides to modify or supplement its witness list, PPLICA will inform the parties and the ALJ, as soon as possible, of any additional intended witnesses.

IV. PROPOSED SCHEDULE AND DISCOVERY RULES

PPLICA supports the proposed schedule set forth as Attachment "A" to PPL's Prehearing Memorandum. PPLICA will cooperate with the ALJ and the parties at the Prehearing Conference to develop appropriate discovery rules in accordance with the Commission's regulations and any ALJ directives.

V. POSSIBILITY OF SETTLEMENT

PPLICA is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By Vasiliki Karandrikas
David M. Kleppinger (PA I.D. No. 32091)
Pamela C. Polacek (PA I.D. No. 78276)
Vasiliki Karandrikas (PA I.D. No. 89711)
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
Phone: (717) 232-8000
Fax: (717) 237-5300

Dated: May 29, 2007

Counsel to PP&L Industrial Customer
Alliance

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

Air Products and Chemicals, Inc.
Alcoa, Inc.
Binkley & Ober, Inc.
The Linde Group
Buckeye Pipe Line Company, L.P.
CertainTeed Corporation
Chamberlain Manufacturing Corp.
Cinram Manufacturing Inc.
Hercules Cement Company
Hershey Foods Corporation
High Industries, Inc.
Lafarge Whitehall Cement
Mount Joy Wire Corporation
Praxair, Inc.
Rieter Automotive North America, Carpet
Sanofi Pasteur, Inc.
Strochmann Bakeries
TIMET North America
Wegmans Food Markets, Inc.

APPENDIX "A"

2011 OCT 29 PM 2:15
SECRET

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

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

Kenneth L. Mickens, Esquire
Charles Daniel Shields, Esquire
Office of Trial Staff
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120

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

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

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

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

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

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

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

2001 JUN 29 PM 2:15
SECTION 1.54 SERVICE

Certificate of Service
Page 2
Docket No. R-00072155

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

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

Hon. Susan D. Colwell
Administrative Law Judge
PA Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265

Richard Galligan
Exeter Associates, Inc.
Suite 310
5565 Sterrett Place
Columbia, MD 21044



Vasiliki Karandrikas

Counsel to the PP&L Industrial Customer Alliance

Dated this 29th day of May, 2007, at Harrisburg, Pennsylvania.

Paul E. Russell
Associate General Counsel

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



ORIGINAL

May 29, 2007

RECEIVED

MAY 29 2007

FEDERAL EXPRESS

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

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

**DOCUMENT
FOLDER**

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

Dear Mr. McNulty:

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

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

Very truly yours,

Paul E. Russell

Attachment

MAY 29 2007

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

CERTIFICATION OF SERVICE

Via FedEx

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Office of Trial Staff's Interrogatories, Set XVII, Questions OTS-RE-143-D through OTS-RE-147-D, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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

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

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

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

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

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

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

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

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

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

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

Dated: May 29, 2007



Paul E. Russell

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PPL ELECTRIC UTILITIES CORPORATION

DOCKET NO. R-00072155

DOCKETED
JUN 06 2007

**DOCUMENT
FOLDER**

OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM

I. INTRODUCTION

The Office of Small Business Advocate ("OSBA") is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 ("the Act"). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Representing the OSBA in this matter is Assistant Small Business Advocate Steven C. Gray. Please address all correspondence as follows:

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

SECRETARY'S BUREAU

2007 JUN -5 AM 10:15

11:00 AM

II. FILING BACKGROUND

PPL Electric Utilities Corporation (“PPL” or the “Company”) filed Supplement No. 54 to PPL Electric’s Tariff – Electric Pa. P.U.C. No. 201 on March 29, 2007. The proposed Tariff, if approved by the Commission, would increase the retail distribution rates of PPL by \$83.6 million per year. The OSBA filed a Complaint on April 17, 2007.

III. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

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

The OSBA has identified the following issues after an initial review of the materials submitted by PPL:

1. Whether PPL’s energy and demand forecasts are just, reasonable, and accurately calculated;
2. Whether PPL’s cost allocation methodology is just, reasonable, and accurately calculated;
3. Whether PPL’s revenue allocation among the Company’s customer classes is just and reasonable;
4. Whether PPL’s proposed rate design for the GS-1, GS-3, and GH customer classes is just and reasonable; and
5. Whether PPL’s proposed “Energy Efficiency Rider” is just and reasonable.

The OSBA will participate in the case to assure that the interests of small business customers of PPL are adequately represented and protected.

As appropriate and necessary, the OSBA will investigate and analyze the claims and proposals of the Company and other parties through the cross-examination of witnesses appearing for those parties, through the filing of testimony, and through briefing. The OSBA will particularly focus on any issue where the impact on the interests of the Company's small business consumers would be unjustifiably different than, or disproportionate to, the impact on another class of customers, or otherwise lacking in reasonableness or basic fairness. The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

IV. SERVICE OF DOCUMENTS

The OSBA requests that all parties serve a hard copy of any document filed in this case upon the OSBA and the OSBA witness identified above. In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. Service by electronic mail *only* is not acceptable.

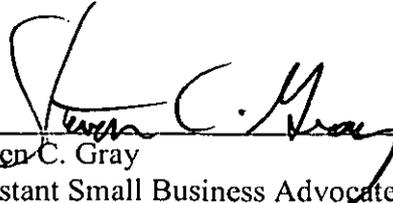
V. SETTLEMENT

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

VI. HEARING AND BRIEFING SCHEDULE

The OSBA has worked with the other parties to develop a procedural schedule. Given the Governor's desire to limit the travel of State Offices under his jurisdiction, the OSBA respectfully requests that the evidentiary hearings take place in Harrisburg.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steven C. Gray", is written over a horizontal line.

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

For:

William R. Lloyd, Jr.
Small Business Advocate
Attorney ID No. 16452

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

Dated: May 30, 2007

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

DOCUMENT
FOLDER

PREHEARING MEMORANDUM
OF THE
OFFICE OF TRIAL STAFF

SECRETARY'S BUREAU
2007 JUN -5 AM 10:15

TO ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:

The Office of Trial Staff ("OTS") of the Pennsylvania Public Utility Commission ("Commission") respectfully submits the following Prehearing Memorandum in the above-captioned proceeding in response to the Notice of the Office of Administrative Law Judge ("OALJ") dated May 11, 2007. The Office of Trial Staff Senior Prosecutors in this proceeding are Kenneth L. Mickens and Charles Daniel Shields. All correspondence directed to the Office of Trial Staff regarding this instant base rate proceeding should be addressed as follows:

Kenneth L. Mickens, Senior Prosecutor
Charles Daniel Shields, Senior Prosecutor
Office of Trial Staff
Pennsylvania Public Utility Commission
Post Office Box 3265
Harrisburg, Pennsylvania 17105-3265

DOCKETED
JUN 06 2007

The OTS fax number is (717) 772-2677. Senior Prosecutor Mickens can be contacted by electronic mail at kmickens@state.pa.us and Senior Prosecutor Shields can be contacted by electronic mail at chshields@state.pa.us.

Per said OALJ Notice, the Prehearing Conference is scheduled for 10:00 a.m. on Thursday, May 31, 2007, in Hearing Room 3 in the Commonwealth Keystone Building.

I. INTRODUCTION

On March 29, 2007, PPL Electric Utilities Corporation (“PPL” or “Company”) filed Supplement No. 54 to Tariff Electric-Pa. P.U.C. No. 201 to become effective June 1, 2007, proposing an increase of \$83,600,000 or 12.4% over present distribution rates, based upon the future test year level of operations for the twelve months ended December 31, 2007.

On April 5, 2007, the Commission on Economic Opportunity filed a Petition to Intervene at this docket. On April 12, 2007, the Office of Consumer Advocate (“OCA”) filed a Formal Complaint. On April 18, 2007, the Office of Small Business Advocate (“OSBA”) filed a Complaint. On April 19, 2007, OTS filed a Notice of Appearance. On May 1, 2007, Richards Energy Group filed a Petition to Intervene. A number of individuals have also filed Formal Complaints against the filing and there are currently at total of at least nine (9) docketed Complaints assigned to this R-00072155 docket.

By Order entered May 30, 2007, the Commission instituted an investigation to determine the lawfulness, justness and reasonableness of the proposed rates, rules and

regulations. Pursuant to 66 Pa. C.S. §1308(d), the filing was suspended by operation of law on until January 1, 2008, unless permitted by Commission Order to become effective at an earlier date. Said Order provided that the case be assigned to the OALJ.

II. ISSUES

The following list represents OTS's preliminary determination of the potential major issues in this case. The listing is as complete as can be made by the OTS at this time. OTS specifically reserves the right to address other issues, as it deems appropriate when any such relevant issues arise. The present list of OTS potential issues is as follows:

Rate of Return

- Cost of Common Equity
- Overall Rate of Return
- Capital Structure

Revenue and Operating Expenses

- Employee Pensions and Benefits
- Maintenance of General Plant
- Payroll
- Rate Case expense
- Uncollectible Accounts
- Customer Accounts - records and collections expense
- Customer Service - Information and Instruction expense
- Advertising and Miscellaneous Sales expense
- Administrative and General Salaries expense - Account 920
- Office Supplies
- Property Insurance
- Community and Economic Development Initiatives
- Deferred Costs for Snow Storms
- Consolidated Income Tax

Taxes other than Income
Various Transmission expenses
Regional Market expenses Account 575.7
Energy Efficiency programs
CAP Program
Other Expenses

Rate Base

Plant in Service
Accrued Depreciation
Future Test Year Plant Additions
Materials and Supplies
Annual Depreciation - Expensed

Revenues

Projected Customer Growth
Annualized Usage
Late Payment Revenue

Rate Structure

Allocation of Rate Increase
Tariff Language

III. WITNESSES

It is currently expected that OTS may call any or all of the following expert witnesses, without being limited thereto:

- **Kevan L. Deardorff, Fixed Utility Financial Analyst Supervisor**
- **Gary Yocca, Fixed Utility Valuation Engineer Supervisor**
- **Janet Markovich, Fixed Utility Financial Analyst**
- **Amanda Gordon, Fixed Utility Financial Analyst**

- **Debra Backer, Fixed Utility Financial Analyst**
- **Joseph Kubas, Fixed Utility Valuation Engineer**
- **Michael J. Gruber, Fixed Utility Valuation Engineer**
- **Antonio Maceo, Fixed Utility Valuation Engineer**

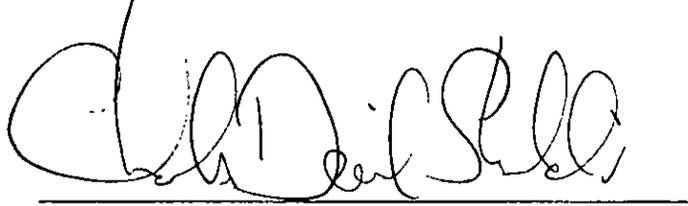
OTS reserves the right to call additional witnesses or delete the names of witnesses listed above. The above listing is provided without the benefit of complete discovery or analysis of the positions of other parties to this proceeding. Prepared direct testimony and brief additional live direct testimony may be submitted by any or all of the OTS witnesses in his or her area(s) of responsibility.

In addition to the direct testimony and exhibits presented by OTS witnesses and the evidence adduced through cross-examination of witnesses for PPL and other parties, OTS intends to rely upon the PPL filing, answers to data requests and interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources and other public documents and reports.

IV. CONCLUSION

OTS represents that we will make a good faith effort to successfully resolve this matter through settlement. In the event such discussions fail to result in a full and complete resolution of the matter, OTS is prepared to litigate this base rate case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles Daniel Shields", written over a horizontal line.

Kenneth L. Mickens
Charles Daniel Shields
Senior Prosecutors
Office of Trial Staff

Pennsylvania Public Utility Commission
Post Office 3265
Harrisburg, Pennsylvania 17105-3265

Dated: May 30, 2007

PROPOSED SCHEDULE*

Pa P.U.C. v. PPL Electric Utilities Corporation.

Docket No. R-00072155

May 31	Prehearing Conference
June 21-29	Public Input Hearings
July 6	Distribute Direct Testimony In-Hand (all parties other than Company)
July 27	Distribute Rebuttal Testimony In-Hand (all parties)
Aug 8	Distribute Surrebuttal Testimony In-Hand (all parties)
August 13, 14 & 16, 17	Hearings in Harrisburg
Sept 5	Main Brief Distributed In-Hand
Sept 17	Reply Brief Distributed [In-Hand to ALJ]

*Electronic or fax service on the due date will satisfy the "in-hand" requirement, where a follow-up hard copy is promptly sent by first-class mail.

GRAIG A. DOLL

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

ORIGINAL

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

May 30, 2007

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

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

**DOCUMENT
FOLDER**

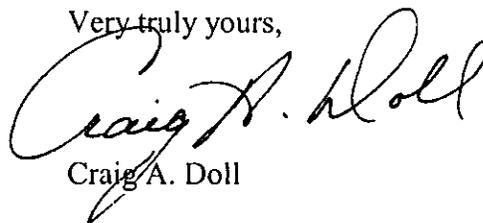
Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corp.
Commission Docket No. R-00072155

Dear Secretary McNulty:

Enclosed for filing is an original and three (3) copies of the Prehearing Memo of Richards Energy Group, Inc. in the above captioned proceeding. A copy of this Prehearing Memo has been served upon Administrative Law Judge Colwell and all parties both electronically and as set forth in the accompanying Certificate of Service.

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

Very truly yours,


Craig A. Doll

Enclosure

cc: Honorable Susan D. Colwell
Per Certificate of Service
F. Richards

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2007 MAY 31 AM 9:29
SECRETARY'S BUREAU

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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2007 MAY 31 AM 9:29
SECRETARY'S BUREAU

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

Prehearing Memo
Of
Richards Energy Group, Inc.

To the Honorable Susan D. Colwell, Administrative Law Judge:

Background

On or about March 29, 2007, PPL Electric Utilities Corporation (“PPL” or “Company”) filed Supplement No. 54 to Tariff Electric- Pa. PUC No. 201 (“Tariff Supplement” or “Supplement No. 54”) seeking to increase its presently authorized distribution rates, rules and regulations which, *inter alia*, would provide PPL with the opportunity to collect an additional \$83.6 million in revenues. Additionally, PPL has proposed various addition tariff changes which, if adopted, could affect the provisioning of services by Richards Energy Group, Inc. (“Richards”) as well as the operations of its clients.

On May 1, 2007, Richards filed a Petition to Intervene in this proceeding on its own behalf as a certificated generation supplier¹, a distribution customer of PPL, as well as the representative for a group of client customers who receive distribution service from PPL. At

¹ Richards is a licensed electric generation supplier authorized by the Commission to provided services to commercial, industrial, and institutional customers within the Commonwealth of Pennsylvania. (A-110072).

present approximately 210 industrial, commercial, and institutional entities (approximately 700 accounts) are PPL customers.²

Issues

Although Richards has not completed its review of all materials filed by PPL to date, it has identified the following broad issues which it intends to address:

1. The redefining, closing, and elimination of certain rate classifications.
2. Elimination of the distinction between high and low load factor customers in distribution rates.
3. The proper allocation of increased revenues.
4. The apparent elimination of time of day pricing. Richards represents over 100 accounts that participate in these programs.
5. The appropriate level and/or limitation of the Energy Efficiency Fund.

To the extent that Richards' continuing review, informal discovery and discussions, the responses of PPL to interrogatories, and the positions of other parties to this proceeding reveals additional issues, Richards reserves the right to modify this list.

Witnesses

Richards intends to present one technical witness in this proceeding. This witness will present direct, rebuttal, and surrebuttal testimony on the above issues. At present, Richards contemplates the presentation of Mr. Frank Richards as its technical witness in this proceeding. Individual members of the Richards' customer group have been contacted regarding the

² At present, Richards is in the process of forming a customer group. During the course of this proceeding, Richards will update the member list of this group.

presentation of testimony. No final decision has been made as to whether certain of those individuals will present written testimony or participate in the public input hearings.

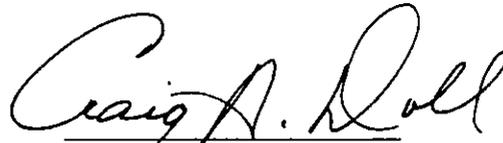
Discovery

At this time Richards plans extremely limited formal discovery. Richards fully intends to take advantage of PPL's offer to conduct informal discovery and discussions with appropriate PPL personnel.

Schedule

Richards fully supports the schedule as outlined by the parties and communicated to Your Honor.

Respectfully submitted,



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

(717) 566-9000

Attorney I.D. # 22814

Attorney for Richards Energy Group, Inc.

Dated: May 30, 2007

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
2007 MAY 31 AM 9:29
PENNSYLVANIA
SECRETARY'S BUREAU

Pennsylvania Public Utility Commission

v.

PPL Electric Utilities Corp.

:
:
:
:
:

Docket No. R-00072155

CERTIFICATE OF SERVICE

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

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

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

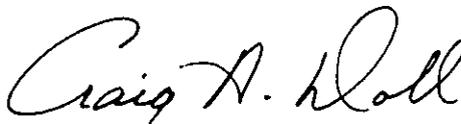
Pamela C. Polacek, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace & Nurick, LLP
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108

Eric J. Epstein
4100 Hillside Road
Harrisburg, PA 17112

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

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

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



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

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

Attorney for Richards Energy Group, Inc.

DATED: May 30, 2007

Paul E. Russell
Associate General Counsel

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



ORIGINAL

May 30, 2007

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MAY 30 2007

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

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

**DOCUMENT
FOLDER**

Dear Mr. McNulty:

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

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

Very truly yours,

Paul E. Russell

Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATION OF SERVICE

Via FedEx

RECEIVED

MAY 30 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Eric Joseph Epstein's Interrogatories, Set I, Questions 1 through 7, and 9 through 13, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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

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

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

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

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

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

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

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

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112

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

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

Dated: May 30, 2007



Paul E. Russell

OALJ Hearing Report

Please check those blocks which apply

Docket No.:	R-00072155		YES	NO
		Prehearing Held:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Case Name:	Pa PUC v. PPL Electric Utilities Corporation	Hearing Held:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Prehearing conference	Testimony Taken:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Transcript Due:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Hearing Concluded:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Location:	Harrisburg	Further Hearing Needed:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Date:	Thursday, May 31, 2007	Estimated Add'l Days:	4	
ALJ:	Susan D. Colwell	RECORD CLOSED:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		DATE:		
Reporting Firm:	Commonwealth Reporting	Briefs to be Filed:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		DATE:		
<p>DOCUMENT FOLDER</p> <p>RECEIVED</p> <p>JUN - 6 2007</p> <p>PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU</p>		Bench Decision:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		REMARKS:	SCHEDULING ORDER TO BE ISSUED,	

PLEASE PRINT CLEARLY – Incomplete information may result in delay of processing.

Name and Telephone Number	Address	Who are you representing?
Paul E. Russell, Esq. Telephone: 610-774-4254	Two North Ninth Street City: Allentown, State: PA, Zip: 18101-1179 E-mail Address: <i>prussell@pplweb.com</i>	PPL Electric Utilities Corporation Fax Number: 610-774-6726
David B. MacGregor, Esq. Telephone: 215-587-1197	Post & Schell, PC Four Penn Center 1600 John F. Kennedy Blvd. City: Philadelphia, State: PA, Zip: 19103 E-mail Address: <i>dmacgregor@postschell.com</i>	PPL Electric Utilities Corporation Fax Number:
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Check this box if additional parties or attendees appear on back of form.


 Reporter's Signature

Note: Completion of this form does not constitute an entry of appearance, see 52 Pa. Code §§1.24 and 1.25.

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