

**ORIGINAL**

John H. Isom

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

May 8, 2007

VIA HAND DELIVERY

**DOCUMENT  
FOLDER**

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

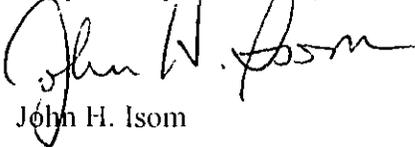
2007 MAY -8 PM 2:45  
SECRETARY'S BUREAU

**RE: Pennsylvania Public Utility Commission v.  
PPL Electric Utilities Corporation  
Docket No. R-00072155C0001**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the Complaint of the Consumer Advocate 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

18



however, PPL Electric's rate of return from serving residential customers will remain below the system average rate of return.

D. The averments of Subparagraph 4.D. of the Complaint are admitted. By way of further response, the proposed rate increase for residential thermal storage customers will move the rate of return for residential thermal storage service toward the system average rate of return. Even at proposed rate levels, however, PPL Electric's return from serving residential thermal storage customers will remain below the system average rate of return.

E. The averments of Subparagraph 4.E. of the Complaint are admitted.

F. The averments of Subparagraph 4.F. of the Complaint are conclusions of law to which no response is required.

G. The averments of Subparagraph 4.G. of the Complaint are denied. To the contrary, tariff modifications proposed by PPL Electric are just and reasonable. All proposed tariff modifications comply with all applicable provisions of the Public Utility Code and will produce only a fair rate of return on rate base.

H. The averments of Subparagraph 4.H. of the Complaint are denied. To the contrary, the tariff changes, rate structure and rate design proposed by PPL Electric are not unduly discriminatory and comply with all applicable provisions of the Public Utility Code. The proposed tariff changes, rate structure and rate design are consistent with sound ratemaking principles and public policy.

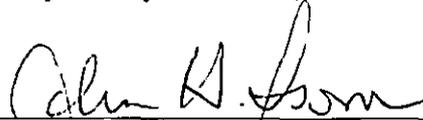
I. The averments of Subparagraph 4.I. of the Complaint are denied. To the contrary, PPL Electric's present rates, rules and regulations are just and reasonable and comply fully with all applicable provisions of the Public Utility Code and sound ratemaking principles, except that present rates are inadequate.

J. The averments of Subparagraph 4.J. of the Complaint are a statement of the subjective intent of the Consumer Advocate in filing the Complaint. As such, they are not averments of fact and, therefore, no response is required. By way of further response, however, the averments of Subparagraph 4.J. are denied.

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

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of Irwin A. Popowsky, Consumer Advocate, be denied.

Respectfully submitted,



David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Phone: 215-587-1197  
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E-mail: [dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)

Michael W. Gang (ID # 25670)  
John H. Isom (ID # 16569)  
Michael W. Hassell (ID # 34851)  
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E-mail: [mhassell@postschell.com](mailto:mhassell@postschell.com)

Paul E. Russell (ID # 21643)  
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PPL Services Corporation  
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Fax: 610-774-6726  
E-mail: [perussell@pplweb.com](mailto:perussell@pplweb.com)

Of Counsel:

Post & Schell, P.C.

Date: May 8, 2007

Attorneys for PPL Electric Utilities Corporation



**CERTIFICATE OF SERVICE**

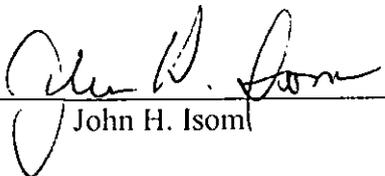
I hereby certify that a true and correct copy of the foregoing Answer to Complaint has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

**VIA FIRST CLASS MAIL**

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

2007 MAY -8 PM 2:45  
SECRETARY'S BUREAU

Date: May 8, 2007

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



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12th Floor  
Harrisburg, PA 17101-1601  
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Secretary  
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Harrisburg, PA 17105-3265

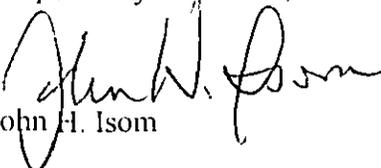
ORIGINAL

**RE: Pennsylvania Public Utility Commission v.  
PPL Electric Utilities Corporation  
Docket No. R-00072155C0002**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the Complaint of PP&L Industrial Customer Alliance 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/ji

Enclosures

cc: Certificate of Service

2007 MAY -8 PM 2:46  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
v. : Docket No. R-00072155C0002  
PPL Electric Utilities Corporation :

2007 MAY -8 PM 2:46  
SECRETARY'S OFFICE

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION  
TO THE COMPLAINT OF PP&L INDUSTRIAL CUSTOMER ALLIANCE**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

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

1. In response to Paragraph No. 1 of the Complaint, information regarding the membership of PPLICA is not reasonably available to PPL Electric and, therefore, averments regarding its membership are denied.

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

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

4. The averments of Paragraph No. 4 of the Complaint are admitted in part and denied in part. It is admitted that on March 29, 2007, PPL Electric filed with the Pennsylvania Public Utility Commission ("Commission") Supplement No. 54 to Tariff – Electric Pa. P.U.C. No. 201 to become effective for service rendered on and after June 1, 2007. In addition, PPL Electric filed voluminous testimony and exhibits in support of Supplement No. 54. In these materials, PPL Electric requested a distribution rate increase of approximately \$83.6 million, an increase of approximately 13 percent in PPL Electric's annual distribution revenues. Further, PPL Electric proposed that it be permitted a reasonable opportunity to achieve a fair rate of return on equity of 11.5 percent.

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**DOCKETED**  
MAY 9 - 2007

PPLICA's characterizations of the reasons for PPL Electric's rate increase are denied as stated. To the contrary, the reasons for PPL Electric's proposed rate increase are set forth in the voluminous testimony and exhibits that accompanied Supplement No. 54.

5. Paragraph No. 5 of the Complaint consists of characterizations of PPLICA's intent in filing the Complaint. As such, the averments of Paragraph No. 5 of the Complaint are not averments of fact and, therefore, no response is required.

6. The averments of Paragraph No. 6 of the Complaint are denied. As explained in response to Paragraph No. 1 of the Complaint, information regarding the membership of PPLICA is not reasonably available to PPL Electric. Therefore, averments regarding PPLICA's members, including information regarding their use of electricity, are denied.

PPLICA's averments that PPLICA has satisfied the standards for intervention in this proceeding as set forth in the Commission's regulations at 52 Pa. Code § 5.72 are conclusions of law to which no response is required. Further, such averments are irrelevant because PPLICA has filed a complaint and not a petition to intervene.

7. The averments of Paragraph No. 7 of the Complaint are denied. To the contrary, information and data submitted by PPL Electric in support of Supplement No. 54 to Tariff – Electric Pa. P.U.C. No. 201 fully support Supplement No. 54. Rates proposed in Supplement No. 54 are just, reasonable, not unduly discriminatory and comply fully with all applicable provisions of the Public Utility Code.

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

9. The averments of Paragraph No. 9 of the Complaint include a list of issues which PPLICA requests the Commission to investigate during the course of the proceeding. As such,

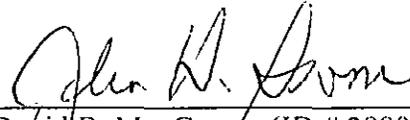
the averments of Paragraph No. 9 of the Complaint are not averments of fact and, therefore, no response is required. By way of further response, however, Supplement No. 54 to Tariff Electric – Pa. P.U.C. No. 201 is fully supported by the voluminous testimony and exhibits submitted by PPL Electric with Supplement No. 54.

In the remaining averments of Paragraph No. 9 of the Complaint, PPLICA purport to reserve PPLICA right to raise additional issues. Such “reservation,” however, is of no effect. If PPLICA has no right to raise additional issues, then it may not “reserve” rights that it does not have; PPLICA may not create a non-existent right by “reserving” it. Alternatively, if PPLICA does have the right to raise additional issues, there would be no need to “reserve” the right.

10. The averments of Paragraph No. 10 of the Complaint are requests for relief to which no response is required.

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

Respectfully submitted,



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David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Phone: 215-587-1197  
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Michael W. Gang (ID # 25670)  
John H. Isom (ID # 16569)  
Michael W. Hassell (ID # 34851)  
Post & Schell, P.C.  
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E-mail:[mhassell@postschell.com](mailto:mhassell@postschell.com)

Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
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Two North Ninth Street  
Allentown, PA 18106  
Phone: 610-774-4254  
Fax: 610-774-6726  
E-mail:[perussell@pplweb.com](mailto:perussell@pplweb.com)

Of Counsel:

Post & Schell, P.C.

Date: May 8, 2007

Attorneys for PPL Electric Utilities Corporation



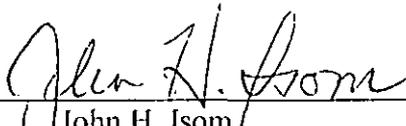
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Answer to Complaint 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**

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

Date: May 8, 2007

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

2007 MAY -8 PM 2:46  
SECURITY BUREAU

John H. Isom

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717-612-6032 Direct  
File #: 2507-131149

**ORIGINAL**

May 8, 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

**DOCUMENT  
FOLDER**

SECRETARY'S BUREAU

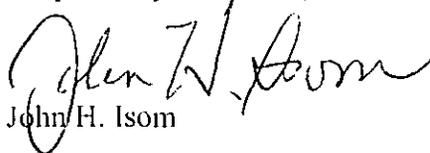
2007 MAY -8 PM 2:45

**RE: Pennsylvania Public Utility Commission v.  
PPL Electric Utilities Corporation  
Docket No. R-00072155C0003**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the Complaint of the Small Business Advocate 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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

2007 MAY -8 P11 2:45  
SECRETARY'S BUREAU

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-00072155C0003  
 :  
 PPL Electric Utilities Corporation :

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION  
TO THE COMPLAINT OF THE SMALL BUSINESS ADVOCATE**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

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

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted.
3. The averments of Paragraph No. 3 of the Complaint are admitted except that the complete name of the Respondent is PPL Electric Utilities Corporation.
4. The averments of Paragraph No. 4 of the Complaint are conclusions of law to which no response is required.
5. The averments of Paragraph No. 5 of the Complaint are admitted in part and denied in part. It is admitted that PPL Electric, on March 29, 2007, filed Supplement No. 54 to Tariff - Electric Pa. P.U.C. No. 201. There, PPL Electric proposed increases in rates to produce approximately \$83.6 million of additional annual operating revenues.

**DOCUMENT  
FOLDER**

The remaining averments of Paragraph No. 5 of the Complaint are denied. To the contrary, PPL Electric's proposed rates, rules and conditions of service are just, reasonable and not unduly discriminatory. Further, PPL Electric's proposed rates, rules and conditions of service comply with all applicable provisions of the Public Utility Code. Finally, PPL Electric's

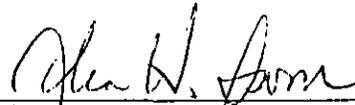
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MAY 9 - 2007

proposed rates, rules and conditions of service are fully supported by the testimony and exhibits that were filed with Supplement No. 54 on March 29, 2007.

6. The averments of Paragraph No. 6 of the Complaint are denied. To the contrary, PPL Electric's proposed rates, rate design and cost and revenue allocations are just, reasonable and not unduly discriminatory. Finally, PPL Electric's proposed rates, rate design and cost and revenue allocations comply fully with all applicable provisions of the Public Utility Code and are consistent with appropriate public policy and sound ratemaking principles. Further, PPL Electric's proposed rates, rate design and cost and revenue allocations are fully supported by the testimony and exhibits filed with Supplement No. 54 on March 29, 2007.

7. The averments of Paragraph No. 7 of the Complaint are requests for relief to which no response is required.

Respectfully submitted,



---

David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Phone: 215-587-1197  
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Michael W. Gang (ID # 25670)  
John H. Isom (ID # 16569)  
Michael W. Hassell (ID # 34851)  
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Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
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Allentown, PA 18106  
Phone: 610-774-4254  
Fax: 610-774-6726  
E-mail:[perussell@pplweb.com](mailto:perussell@pplweb.com)

Of Counsel:

Post & Schell, P.C.

Date: May 8, 2007

Attorneys for PPL Electric Utilities Corporation



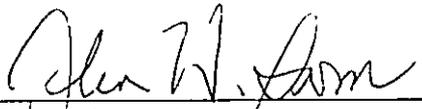
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Answer to Complaint 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**

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

Date: May 8, 2007

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

2007 MAY -8 PM 2:45  
SECRETARY'S BUREAU



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Fax  
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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**

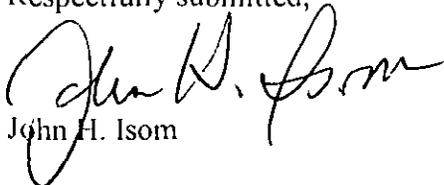
**RE: Pennsylvania Public Utility Commission v.  
PPL Electric Utilities Corporation  
Docket No. R-00072155C0004**

**DOCUMENT  
FOLDER**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the Complaint of Andrew T. Bosak 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

2007 MAY 25 PM 2:57  
SECRETARY'S BUREAU

TS

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

2007 MAY 25 PM 2:57  
SECURITY BUREAU

Pennsylvania Public Utility Commission :  
v. : Docket No. R-00072155C0004  
PPL Electric Utilities Corporation :

ANSWER OF PPL ELECTRIC UTILITIES CORPORATION  
TO THE COMPLAINT OF ANDREW T. BOSAK

DOCUMENT  
FOLDER

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Andrew T. Bosak, as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted, except that the complete name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are admitted.
4. In response to Paragraph No. 4 of the Complaint, it is admitted that, on March 29, 2007, PPL Electric filed with the Pennsylvania Public Utility Commission ("Commission") Supplement No. 54 to Tariff – Electric Pa. P.U.C. No. 201, as well as supporting data. Therein, PPL Electric proposed an overall increase in base rates designed to produce \$83.6 million of additional annual operating revenues. PPL Electric proposed increases in rates that would cause bills to a residential customer using 1,000 kilowatt-hours of electricity per month to increase by 6.8 percent. Further, PPL Electric's proposed rates would increase bills to commercial customers using 1,000 kilowatt hours of electricity by 0.5 percent.

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MAY 29 2007

Information regarding Mr. Bosak's personal circumstances is not reasonably available to PPL Electric and, therefore, such averments are denied.

The remaining averments of Paragraph No. 4 of the Complaint are denied. To the contrary, proposed rates are just and reasonable, and not unduly discriminatory. Further, proposed rates comply with all applicable requirements of the Public Utility Code and are consistent with appropriate public policy and sound ratemaking principles.

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

WHEREFORE, for the all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of the Andrew T. Bosak be denied.

Respectfully submitted,



David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
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E-mail: [jisom@postschell.com](mailto:jisom@postschell.com)  
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Of Counsel:

Post & Schell, P.C.

Date: May 25, 2007

Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
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E-mail: [perussell@pplweb.com](mailto:perussell@pplweb.com)

Attorneys for PPL Electric Utilities Corporation



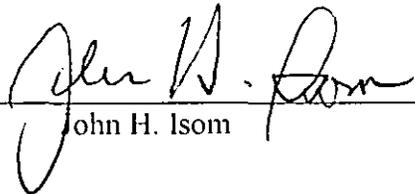
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I hereby certify that a true and correct copy of the foregoing Answer to Complaint has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

**VIA FIRST CLASS MAIL**

Andrew T. Bosak  
3435 Second Street  
Steelton, PA 17113

Date: May 25, 2007

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

2007 MAY 25 PM 2:57  
SEALING UNIT



17 North Second Street  
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John H. Isom

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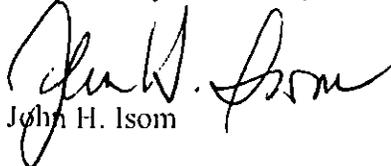
**RE: Pennsylvania Public Utility Commission v.  
PPL Electric Utilities Corporation  
Docket No. R-00072155C0005**

**DOCUMENT  
FOLDER**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the Complaint of Daniel D. Graham 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

2007 MAY 25 PM 2:58  
SECRETARY'S BUREAU

76

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

2007 MAY 25 PM 2:59  
SECRETARY'S OFFICE

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-00072155C0005  
 :  
 PPL Electric Utilities Corporation :

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION  
TO THE COMPLAINT OF DANIEL D. GRAHAM**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

**DOCUMENT  
FOLDER**

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Daniel D. Graham, as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted.
3. The averments of Paragraph No. 3 of the Complaint are admitted.
4. The averments of Paragraph No. 4 of the Complaint are admitted in part and

denied in part. It is admitted that, on March 29, 2007, PPL Electric filed with the Pennsylvania Public Utility Commission ("Commission") Supplement No. 54 to Tariff – Electric Pa. P.U.C. No. 201, as well as supporting data. Therein, PPL Electric proposed increases in rates designed to produce \$83.6 million of additional annual operating revenues, an increase in overall jurisdictional revenues of approximately 2.7 percent.

The remaining averments of Paragraph No. 4 of the Complaint are denied. To the contrary, PPL Electric's proposed rates are just and reasonable, and will provide PPL Electric only a reasonable opportunity to earn a fair rate of return. Further, proposed rates are just and reasonable, and not unduly discriminatory. Proposed rates comply with all applicable

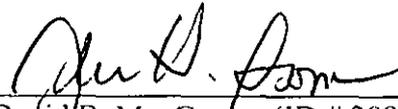
**DOCKETED**  
MAY 29 2007

requirements of the Public Utility Code and are consistent with appropriate public policy and sound ratemaking principles.

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

WHEREFORE, for the all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of the Daniel D. Graham be denied.

Respectfully submitted,

  
\_\_\_\_\_  
David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Phone: 215-587-1197  
Fax: 215-320-4879  
E-mail: [dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)

Michael W. Gang (ID # 25670)  
John H. Isom (ID # 16569)  
Michael W. Hassell (ID # 34851)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
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Fax: 717-731-1985  
E-mail: [mgang@postschell.com](mailto:mgang@postschell.com)  
E-mail: [jisom@postschell.com](mailto:jisom@postschell.com)  
E-mail: [mhassell@postschell.com](mailto:mhassell@postschell.com)

Of Counsel:

Post & Schell, P.C.

Date: May 25, 2007

Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
Two North Ninth Street  
Allentown, PA 18106  
Phone: 610-774-4254  
Fax: 610-774-6726  
E-mail: [perussell@pplweb.com](mailto:perussell@pplweb.com)

Attorneys for PPL Electric Utilities Corporation







17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
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-00072155C0006**

**DOCUMENT  
FOLDER**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the Complaint of Stephanie Crayton 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 2:47

71

2007 MAY 25 PM 2:48  
SECURITY SERVICES BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
(Stephanie Crayton) :  
 : Docket No. R-00072155C0006  
v. :  
 :  
PPL Electric Utilities Corporation :

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION  
TO THE COMPLAINT OF STEPHANIE CRAYTON**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

**DOCUMENT  
FOLDER**

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Stephanie Crayton, as follows:

**DOCKETED**  
MAY 29 2007

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted, except that the complete name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are admitted.
4. PPL Electric answers Paragraph No. 4 of the Complaint as follows. It is admitted that Ms. Crayton opposes the increase in base rates that was proposed by PPL Electric in Supplement No. 54 to Tariff – Electric Pa. P.U.C. No. 201 on March 29, 2007. Proposed rates, however, are just and reasonable, are not unduly discriminatory and comply with all applicable provisions of the Public Utility Code. Further, proposed rates are consistent with sound ratemaking principles and appropriate public policy.

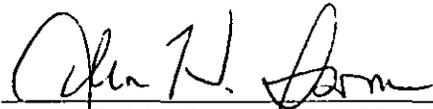
Ms. Crayton also avers that the lights at her residence have flickered at times recently. Ms. Crayton had been in contact with PPL Electric regarding her concerns. In response to her contacts, a crew from PPL Electric was dispatched and inspected facilities in the vicinity of her residence. The crew determined that lights had flickered due to the failure of a circuit breaker to

operate properly at a nearby substation. The circuit breaker was replaced. In addition, the crew determined that, in order to maintain safe, adequate and reliable service in the future, a set of connectors and a transformer were replaced, even though they had not yet failed. PPL Electric believes that the cause of the flickering at her residence was the circuit breaker at a substation near Ms. Crayton's residence. The connectors and transformers were replaced to reduce the possibility of service problems near her residence in the future. This work was completed during the week of May 21, 2007.

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

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

Respectfully submitted,



David B. MacGregor (ID # 28804)

Post & Schell, P.C.

Four Penn Center

1600 John F. Kennedy Boulevard

Philadelphia, PA 19103-2808

Phone: 215-587-1197

Fax: 215-320-4879

E-mail: [dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)

SECRETARY'S BUREAU

2007 MAY 25 PM 2:48

Michael W. Gang (ID # 25670)  
John H. Isom (ID # 16569)  
Michael W. Hassell (ID # 34851)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
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Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: [mgang@postschell.com](mailto:mgang@postschell.com)  
E-mail: [jisom@postschell.com](mailto:jisom@postschell.com)  
E-mail: [mhassell@postschell.com](mailto:mhassell@postschell.com)

Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
Two North Ninth Street  
Allentown, PA 18106  
Phone: 610-774-4254  
Fax: 610-774-6726  
E-mail: [pcrussell@pplweb.com](mailto:pcrussell@pplweb.com)

Of Counsel:

Post & Schell, P.C.

Date: May 25, 2007

Attorneys for PPL Electric Utilities Corporation



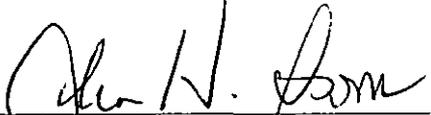
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Answer to Complaint 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**

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

Date: May 25, 2007

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

2007 MAY 25 PM 2:48  
SECTION 101'S BUREAU

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-00072155C0007**

**DOCUMENT  
FOLDER**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the Complaint of Judith A. Lewis-Walton 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 2:59

77

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-00072155C0007  
 :  
 PPL Electric Utilities Corporation :

2007 JUN 25 PM 3:00  
SECRETARY'S OFFICE

ANSWER OF PPL ELECTRIC UTILITIES CORPORATION  
TO THE COMPLAINT OF JUDITH A. LEWIS-WALTON

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

DOCUMENT  
FOLDER

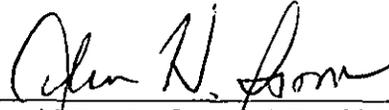
PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Judith A. Lewis-Walton, as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted, except that the complete name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are admitted.
4. In response to Paragraph No. 4 of the Complaint, information regarding the personal financial circumstances of Ms. Lewis-Walton is not reasonably available to PPL Electric and, therefore, such averments are denied. By way of further response, however, rates proposed by PPL Electric in Supplement No. 54 to Tariff – Electric Pa. P.U.C. No. 201 are just and reasonable, and not unduly discriminatory. Proposed rates comply with all applicable provisions of the Public Utility Code and are consistent with sound public policy and appropriate ratemaking principles.
5. The averments of Paragraph No. 5 of the Complaint are requests for relief to which no response is required.

DOCKETED  
MAY 29 2007

WHEREFORE, for the all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Complaint of the Judith A. Lewis-Walton be denied.

Respectfully submitted,



David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Phone: 215-587-1197  
Fax: 215-320-4879  
E-mail: [dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)

Michael W. Gang (ID # 25670)  
John H. Isom (ID # 16569)  
Michael W. Hassell (ID # 34851)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
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E-mail: [mgang@postschell.com](mailto:mgang@postschell.com)  
E-mail: [jisom@postschell.com](mailto:jisom@postschell.com)  
E-mail: [mhassell@postschell.com](mailto:mhassell@postschell.com)

Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
Two North Ninth Street  
Allentown, PA 18106  
Phone: 610-774-4254  
Fax: 610-774-6726  
E-mail: [perussell@pplweb.com](mailto:perussell@pplweb.com)

Of Counsel:

Post & Schell, P.C.

Date: May 25, 2007

Attorneys for PPL Electric Utilities Corporation



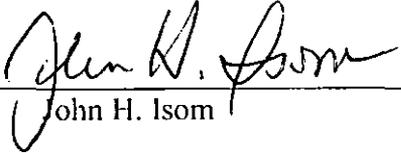
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Answer to Complaint 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**

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

Date: May 25, 2007

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

2007 MAY 25 PM 4:00  
SECL. DIV. 793 0000EADU



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
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**

**DOCUMENT  
FOLDER**

**RE: Pennsylvania Public Utility Commission v.  
PPL Electric Utilities Corporation  
Docket No. R-00072155C0008**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the Complaint of Margaret Gay 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

SECTION OF CLERK

2007 MAY 25 PM 4:01

68

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-00072155C0008  
 :  
 PPL Electric Utilities Corporation :

2007 MAY 25 PM 4:01  
SECRETARY'S OFFICE

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION  
TO THE COMPLAINT OF MARGARET GAY**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

**DOCUMENT  
FOLDER**

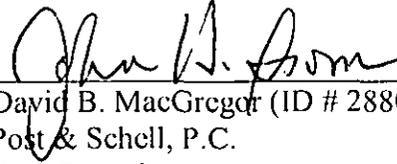
PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Margaret Gay, as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted, except that the complete name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are admitted.
4. In response to Paragraph No. 4 of the Complaint, it is admitted that Ms. Gay opposes the increase in rates proposed by PPL Electric, on March 29, 2007, in Supplement No. 54 to Tariff – Electric Pa. P.U.C. No. 201. By way of further response, proposed rates are just and reasonable, and not unduly discriminatory. Proposed rates comply with all applicable provisions of the Public Utility Code and are consistent with sound public policy and appropriate ratemaking principles. Proposed rates will permit PPL Electric only a reasonable opportunity to achieve a fair rate of return.
5. The averments of Paragraph No. 5 of the Complaint are requests for relief to which no response is required.

**DOCKETED**  
MAY 29 2007

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

Respectfully submitted,



David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Phone: 215-587-1197  
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Michael W. Gang (ID # 25670)  
John H. Isom (ID # 16569)  
Michael W. Hassell (ID # 34851)  
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17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
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E-mail: [jisom@postschell.com](mailto:jisom@postschell.com)  
E-mail: [mhassell@postschell.com](mailto:mhassell@postschell.com)

Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
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Two North Ninth Street  
Allentown, PA 18106  
Phone: 610-774-4254  
Fax: 610-774-6726  
E-mail: [perussell@pplweb.com](mailto:perussell@pplweb.com)

Of Counsel:

Post & Schell, P.C.

Date: May 25, 2007

Attorneys for PPL Electric Utilities Corporation



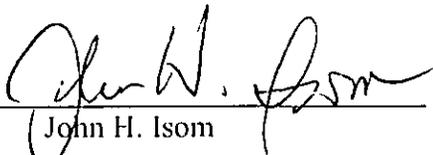
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Answer to Complaint 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**

Margaret Gay  
23 W. Bergh Street  
Plains, PA 18705

Date: May 25, 2007

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

2007 MAY 25 PM 4: 01  
SERIALS ACQUISITION

John H. Isom

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

May 15, 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**

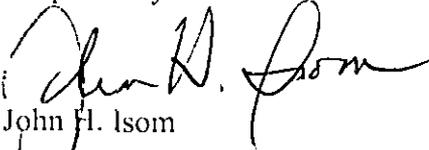
2007 MAY 15 PM 3:51  
SECRETARY'S BUREAU

**RE: Pennsylvania Public Utility Commission v.  
PPL Electric Utilities Corporation  
Docket No. R-00072155C0009**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the Complaint of Eric Joseph Epstein 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

**DOCKETED**  
MAY 16 2007

**DOCUMENT  
FOLDER**



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

2007 MAY 15 PM 3:51  
SECRETARY'S BUREAU

Pennsylvania Public Utility Commission :  
v. : Docket No. R-00072155C0009  
PPL Electric Utilities Corporation :

**ORIGINAL**

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

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of Eric Joseph Epstein, as follows:

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted.
3. The averments of Paragraph No. 3 of the Complaint are admitted in part and denied in part. It is denied that Mr. Epstein is a shareholder of PPL Electric, which is a wholly-owned subsidiary of PPL Corporation. PPL Corporation, in turn, is publically held, and Mr. Epstein may own shares of the stock of PPL Corporation. Information concerning the identities of the shareholders of PPL Corporation, however, is not reasonably available to PPL Electric and, therefore, such averments are denied.

**DOCUMENT  
FOLDER**

**DOCKETED**  
MAY 16 2007

It is admitted that Mr. Epstein is a customer of PPL Electric.

Without responding in detail to Mr. Epstein's averments concerning his participation in prior proceedings involving PPL Electric before the Pennsylvania Public Utility Commission ("Commission"), it is admitted that Mr. Epstein has participated in such proceedings in the past.

5. In response to Paragraph No. 5 of the Complaint, it is admitted that on March 29, 2007, PPL Electric filed with the Commission Supplement No. 54 to Tariff – Electric Pa. P.U.C.

No. 201 together with supporting testimony and exhibits. There, PPL Electric proposed an increase in base rates designed to produce approximately \$83.6 million of addition annual operating revenues.

6. In response to Paragraph No. 6 of the Complaint, it is admitted that Supplement No. 54 would increase rates to residential customers on average by 6.8 percent or by \$6.60 per month for residential customers using 1,000 kilowatt hours of electricity per month.

7. In response to Paragraph No. 7 of the Complaint, Supplement No. 54 bears an effective date of June 1, 2007, but Supplement No. 54 will be suspended by operation of Section 1308(d) of the Public Utility Code, 66 Pa.C.S. § 1308(d) for up to seven months so that new rates will become effective on or before January 1, 2008.

8. In response to Paragraph No. 8 of the Complaint, it is admitted that PPL Electric increased rates effective January 1, 2005, pursuant to the Commission's Order in *Pa. P.U.C. v. PPL Electric Utilities Corporation*, Docket No. R-00049255 (Dec. 22, 2004).

9. In response to Paragraph No. 9 of the Complaint, it is admitted the Commonwealth Court of Pennsylvania affirmed the Commission's Order in *Pa. P.U.C. v. PPL Electric Utilities Corporation*, Docket No. R-00049255 (Dec. 22, 2004) in certain respects and reversed the Commission's Order in other respects. *Lloyd v. Pa. P.U.C.*, 904 A.2d 1010 (2006). The remand of the 2004 base rate case is pending presently before an Administrative Law Judge of the Commission.

10. The averments of Paragraph No. 10 of the Complaint are denied as stated. The reasons for PPL Electric's proposed increase in rates set forth in Supplement No. 54 to Tariff – Electric Pa. P.U.C. No. 201 are set forth in full in the testimony and exhibits that accompanied Supplement No. 54.

11. The averments of Paragraph No. 11 of the Complaint are denied. To the contrary, the testimony and exhibits filed by PPL Electric in support of Supplement No. 54 fully support the proposed increase in rates. Rates set forth in Supplement No. 54 are just, reasonable and not unduly discriminatory. Further, proposed rates comply with all applicable provisions of the Public Utility Code.

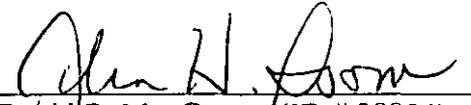
12. The averments of Paragraph No. 12 of the Complaint are conclusions of law to which no response is required.

13. The averments of Paragraph No. 13 of the Complaint are expressions of Mr. Epstein's subjective intent in filing his Complaint. As such, they are not averments of fact. Therefore, no response is required. By way of further response, however, the averments are denied. To the contrary, the scope of Mr. Epstein's Complaint is governed by the specific averments contained therein.

14. The averments of Paragraph No. 14 of the Complaint are requests for relief to which no response is required.

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

Respectfully submitted,

  
David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
Phone: 215-587-1197  
Fax: 215-320-4879  
E-mail: [dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)

Michael W. Gang (ID # 25670)  
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Michael W. Hassell (ID # 34851)  
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Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail:[mgang@postschell.com](mailto:mgang@postschell.com)  
E-mail:[jisom@postschell.com](mailto:jisom@postschell.com)  
E-mail:[mhassell@postschell.com](mailto:mhassell@postschell.com)

Paul E. Russell (ID # 21643)  
Associate General Counsel  
PPL Services Corporation  
Office of General Counsel  
Two North Ninth Street  
Allentown, PA 18106  
Phone: 610-774-4254  
Fax: 610-774-6726  
E-mail:[perussell@pplweb.com](mailto:perussell@pplweb.com)

Of Counsel:

Post & Schell, P.C.

Date: May 15, 2007

Attorneys for PPL Electric Utilities Corporation



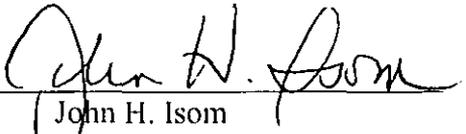
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Answer to Complaint 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**

Eric Joseph Epstein  
4100 Hillsdale Road  
Harrisburg, PA 17112

Date: May 15, 2007

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

2007 MAY 15 PM 3:51  
SECTION 100'S BUREAU

John H. Isom

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

**ORIGINAL**

August 27, 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

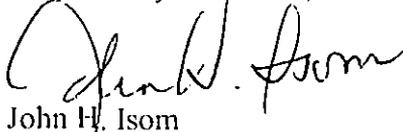
2507-131149  
AUG 27 11:38 AM '07

**RE: Pennsylvania Public Utility Commission v.  
PPL Electric Utilities Corporation  
Docket No. R-00072155C0023**

Dear Secretary McNulty:

Enclosed, for filing, are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation to the Complaint of Michael Ochs 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/skr

Enclosures

cc: Certificate of Service

**DOCUMENT  
FOLDER**

**KJR**

77

**ORIGINAL**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-00072155C0023
	:	
PPL Electric Utilities Corporation	:	
	:	

FILED  
AUG 28 2007  
PPL ELECTRIC UTILITIES CORPORATION

**ANSWER OF PPL ELECTRIC UTILITIES  
CORPORATION TO THE COMPLAINT OF MICHAEL OCHS**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation ("PPL Electric") hereby answers the above-captioned Complaint of the Michael Ochs, as follows:

**DOCUMENT  
FOLDER**

**ANSWER**

1. The averments of Paragraph No. 1 of the Complaint are admitted.
2. The averments of Paragraph No. 2 of the Complaint are admitted except that the complete name of the Respondent is PPL Electric Utilities Corporation.
3. The averments of Paragraph No. 3 of the Complaint are admitted.
4. In response to Paragraph No. 4 of the Complaint, it is admitted that Mr. Ochs opposes the rate increase that was proposed by PPL Electric on May 29, 2007, in Supplement No. \$4 to Tariff – Electric Pa. P.U.C. No. 201.

In Subparagraph 4.B. of the Complaint, Mr. Ochs makes reference to a newspaper article in the Allentown Morning Call published on June 13, 2007. Information is provided concerning past and projected changes in rates for distribution, generation and transmission services. Averments concerning rates for transmission services are irrelevant to this proceeding which relates solely to rates for distribution services. By way of further response, however, it is noted that rates for transmission services are subject to an automatic adjustment clause with

**DOCKETED**  
AUG 28 2007

reconciliation so that PPL Electric recovers only its actual costs of providing transmission services, as incurred pursuant to the Open Access Transmission Tariff of the PJM Interconnection, Inc., which is subject to the jurisdiction of the Federal Energy Regulatory Commission.

Averments concerning rates for generation services are irrelevant to this proceeding which pertains to rates for distribution services. By way of further response, however, rates for generation services are subject to annual rate caps through 2009 which were established in PPL Electric's restructuring proceeding in 1997 pursuant to the Electricity Generation Customer Choice and Competition Act, 66 Pa.C.S. Ch. 28.

Averments concerning a "public benefits charge" pursuant to proposed legislation which may or may not be amended or enacted into law in the future are speculative. Therefore, PPL Electric cannot admit or deny such averments.

Information concerning Mr. Ochs' financial circumstances is not reasonably available to PPL Electric and, therefore, such averments are denied. It is admitted that the rate caps on generation services are scheduled to expire effective January 1, 2010.

The averments of Paragraph No. 4 of the Complaint, that in Mr. Ochs' opinion rates proposed by PPL Electric in this proceeding are excessive, are denied. To the contrary, rates proposed by PPL Electric in Supplement No. 54 are just, reasonable and not unduly discriminatory. Further, the proposed increase in rates complies fully with all applicable provisions of the Public Utility Code and rulings of the Pennsylvania appellate courts.

5. The averments of Paragraph No. 5 of the Complaint are requests for relief to which no response is required. By way of further response, however, averments concerning the remand by the Commonwealth Court of Pennsylvania of the 2004 base rate case in *Lloyd v. Pa.*

*P.U.C.*, 904 A.2d 1010 (Pa. Cmwlth. 2006), and the subsequent approval by the Commission of the settlement of that proceeding are denied. To the contrary, the rate increase residential customers incurred under the settlement of the remand in *Lloyd* provides no basis for reducing the level of the revenue requirement allocated to residential customers in this proceeding.

Averments that PPL Electric should bear the costs of providing compact fluorescent lights to customers are denied. PPL Electric is allowed to recover its reasonable costs of providing service and a fair rate of return. Requiring PPL Electric to provide customers compact fluorescent lights without compensation would deny PPL Electric those rights. By way of further response, however, PPL Electric notes that the promotion of use by customers of compact fluorescent lights is part of PPL Electric's Energy Efficiency and Customer Education that is explained in PPL Electric Statement No. 8.

Averments concerning programs for "weatherization efforts and other social responsibility programs" in Paragraph No. 5 of the Complaint are denied. By way of further response, however, PPL Electric notes that it has proposed to expand its Low Income Usage Reduction Program and universal service programs which are designed to benefit low-income, payment troubled customers.

Averments concerning PPL Electric's transformers are denied. To the contrary, transformers used by PPL Electric in providing service to customers are efficient.

Further, averments concerning PPL Electric's alternative energy portfolio are denied. To the contrary, PPL Electric is in full compliance with the Alternative Energy Portfolio Standards Act of 2004, and PPL Electric is making appropriate plans to remain in compliance with the Alternative Energy Portfolio Standards Act of 2004 in the future.

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

Respectfully submitted,



David B. MacGregor (ID # 28804)  
Post & Schell, P.C.  
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Paul E. Russell (ID # 21643)  
Associate General Counsel  
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Office of General Counsel  
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Allentown, PA 18106  
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Fax: 610-774-6726  
E-mail: perussell@pplweb.com

Of Counsel:

Post & Schell, P.C.

Date: August 27, 2007

Attorneys for PPL Electric Utilities Corporation

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA )  
: SS  
COUNTY OF LEHIGH )

ROBERT M. GENECKO, being duly sworn according to law, deposes and says that he is Vice President-Customer Service for PPL Electric Utilities Corporation; that he is authorized to and does make this affidavit for it; and that the facts set forth above are true and correct to the best of his knowledge, information and belief and he expects the said PPL Electric Utilities Corporation to be able to prove the same at any hearing hereof.

Robert M. Genecko

Sworn to and subscribed  
before me this *24<sup>th</sup>* day  
of *August*

Jean C. Dobrenko

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Jean C. Dobrenko, Notary Public  
City of Allentown, Lehigh County  
My Commission Expires Sept. 23, 2007  
Member, Pennsylvania Association of Notaries

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Answer to Complaint 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 HAND DELIVERY**

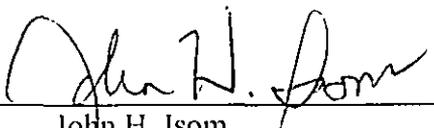
Honorable Susan D. Colwell  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
P.O. Box 3265  
Harrisburg, PA 17105

2007  
AUG 27 PM 9:37

**VIA FIRST CLASS MAIL**

Michael Ochs  
1633 Scott Street  
Williamsport, PA 17701-4458

Date: August 27, 2007

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

5-16 586 K

Joseph Nabogis  
1883 Bald Mountain Rd  
Wilkes-Barre PA 18702  
October 2, 2007

COPY

Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Bldg  
400 N St  
Harrisburg PA 17120

RE: Pennsylvania Public Utility Commission vs PPL Utilities Corp  
Docket Nos. R-00072155, R-00072155C0026

I, Joseph Nabogis, wish to formally withdraw my complaint against  
PPL Utilities Corporation.

Yours truly,

*Joseph Nabogis*  
Joseph Nabogis

RECEIVED

OCT 4 2007

OFFICE OF CALJ  
PUBLIC UTILITY COMMISSION

SECRETARY'S BUREAU

2007 OCT -4 AM 9:04

4

**COMMONWEALTH OF PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

**DATE:** October 11, 2007

**SUBJECT:** R-00072155C0022 - Joseph Nabogis  
PA Public Utility Commission v. PPL Utilities Corporation

**TO:** Wanda Zeiders  
Docket Management

**FROM:** Ona Lester, ALJ Support Staff  
Office of Administrative Law Judge

**DOCUMENT  
FOLDER**

On October 4, 2007, a Petition for leave to Withdraw was filed in the above-captioned proceeding. If no objection is filed to this petition within 20 days of the filing, this proceeding will be closed.

All parties should be notified that the case is closed and a copy of that notification placed in the document folder.

Attachment

pc: ALJ Susan D. Colwell  
Beth Plantz  
Case File

**DOCKETED**  
OCT 25 2007