

OALJ Hearing Report

Please Check Those Blocks Which Apply

Docket No.:	P-00062227		YES	NO
Case Name:	Petition of PPL Electric Utilities Corporation for Approval of a Competitive Bridge Plan	Prehearing Held:	<input type="checkbox"/>	<input type="checkbox"/>
		Hearing Held:	<input type="checkbox"/>	<input type="checkbox"/>
		Testimony Taken:	<input type="checkbox"/>	<input type="checkbox"/>
		Transcript Due:	<input type="checkbox"/>	<input type="checkbox"/>
		Hearing Concluded:	<input type="checkbox"/>	<input type="checkbox"/>
Location:	Harrisburg	Further Hearing Needed:	<input type="checkbox"/>	<input type="checkbox"/>
Date:	September 22, 2006	Estimated Add'l Days:		
ALJ:	Marlane R. Chestnut	RECORD CLOSED:	<input type="checkbox"/>	<input type="checkbox"/>
Reporting Firm:	Commonwealth Reporting	DATE:		
		Briefs to be Filed:	<input type="checkbox"/>	<input type="checkbox"/>
		DATE:		
		Bench Decision:	<input type="checkbox"/>	<input type="checkbox"/>
		REMARKS:		

RECEIVED

SEP. 26 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PLEASE PRINT CLEARLY - Incomplete Information may result in delay of processing.

**DOCUMENT
FOLDER**

Name and Telephone Number	Address	Who are you representing?
James Mullins, Esquire	Forum Place, 5 th Floor 555 Walnut Street City: Harrisburg State: PA Zip: 17101-1921	Office of Consumer Advocate
Telephone: 717-783-5048	E-mail Address: jmullins@paoca.org	Fax Number: 717-783-7152
Kenneth Mickens, Esquire	P.O. Box 3265 City: Harrisburg State: PA Zip: 17105-3265	PA Public Utility Commission Office of Trial Staff
Telephone: 717-787-1976	E-mail Address: kmickens@state.pa.us	Fax Number: 717-772-2677
Scott Rubin, Esquire	3 Lost Creek Drive City: Sellingsrove State: PA Zip: 17870	International Brotherhood of Electrical Workers, Local 1600
Telephone: 570-743-2233	E-mail Address: scott@publicutilityhome.com	Fax Number: 570-743-8145

Check this box if additional parties or attendees appear on back of form.

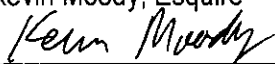
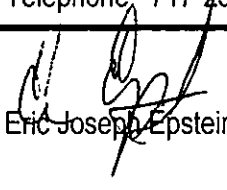
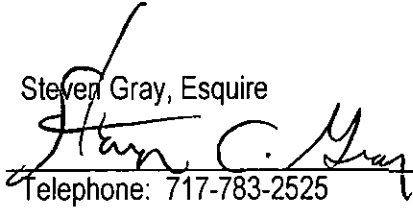
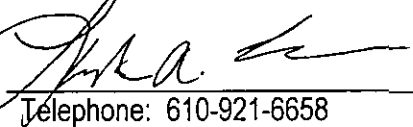
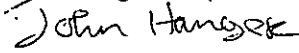
Michael Hassell
Post & Schell, PC
17 W 2nd St.
12 floor
Harrisburg PA, 17101

PPL Electric Utilities Corp.

Reporter's Signature

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

elf

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Pamela C. Polacek, Esquire Adam L. Benshoff, Esquire	McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166	PP&L Industrial Customer Alliance	
	<table border="1"> <tr> <td>City Harrisburg</td> <td>State PA</td> <td>Zip 17108-1166</td> </tr> </table>		City Harrisburg
City Harrisburg	State PA	Zip 17108-1166	
Telephone: 717-232-8000	E-mail Address: ppolacek@mwn.com	Fax Number: 717-237-5300	
Kevin Moody, Esquire 	Wolf Block Schorr and Solis-Cohen LLP 213 Market Street, 9 th Floor	Retail Energy Supply Association, Strategic Energy, Direct Energy Services	
	<table border="1"> <tr> <td>City Harrisburg</td> <td>State PA</td> <td>Zip 17108-0865</td> </tr> </table>		City Harrisburg
City Harrisburg	State PA	Zip 17108-0865	
Telephone: 717-237-7187	E-mail Address: kmoody@wolfblock.com	Fax Number: 717-237-2767	
Patricia Armstrong, Esquire	Thomas Thomas Armstrong & Niesen 212 Locust Street, Suite 500	Sustainable Energy Fund of Central Eastern Pennsylvania	
	<table border="1"> <tr> <td>City Harrisburg</td> <td>State PA</td> <td>Zip 17108-9500</td> </tr> </table>		City Harrisburg
City Harrisburg	State PA	Zip 17108-9500	
Telephone: 717-255-7641	E-mail Address: parmstrong@ttanlaw.com	Fax Number: 717-236-8278	
 Eric Joseph Epstein	4100 Hillsdale Road	Pro Se	
	<table border="1"> <tr> <td>City Harrisburg</td> <td>State PA</td> <td>Zip 17112</td> </tr> </table>		City Harrisburg
City Harrisburg	State PA	Zip 17112	
Telephone: 717-541-1101	E-mail Address: ericepstein@comcast.net	Fax Number: 717-541-5487	
Steven Gray, Esquire 	Suite 1102, Commerce Building 300 North Second Street	Office of Small Business Advocate	
	<table border="1"> <tr> <td>City Harrisburg</td> <td>State PA</td> <td>Zip 17101</td> </tr> </table>		City Harrisburg
City Harrisburg	State PA	Zip 17101	
Telephone: 717-783-2525	E-mail Address:	Fax Number: 717-783-2831	
Linda Evers, Esquire 	FirstEnergy Service Company 2800 Pottsville Pike P.O. Box 16001	Metropolitan Edison Company, Pennsylvania Electric Company	
	<table border="1"> <tr> <td>City Reading</td> <td>State PA</td> <td>Zip 19612</td> </tr> </table>		City Reading
City Reading	State PA	Zip 19612	
Telephone: 610-921-6658	E-mail Address: levers@firstenergycorp.com	Fax Number: 610-939-8655	
John Hanger, Esquire 	610 North Third Street	PennFuture	
	<table border="1"> <tr> <td>City Harrisburg</td> <td>State PA</td> <td>Zip 17101</td> </tr> </table>		City Harrisburg
City Harrisburg	State PA	Zip 17101	
Telephone: 717-214-7920	E-mail Address: hanger@pennfuture.org	Fax Number: 717-214-7927	

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

elp

OALJ Hearing Report

Please Check Those Blocks Which Apply

Docket No.:	P-00062227		YES	NO
		Prehearing Held:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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		Transcript Due:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Hearing Concluded:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Location:	Philadelphia	Further Hearing Needed:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Estimated Add'l Days:		
Date:	September 22, 2006			
		RECORD CLOSED:	<input type="checkbox"/>	<input type="checkbox"/>
ALJ:	Marlane R. Chestnut	DATE:		
		Briefs to be Filed:	<input type="checkbox"/>	<input type="checkbox"/>
Reporting Firm:	Commonwealth Reporting	DATE:		
		Bench Decision:	<input type="checkbox"/>	<input type="checkbox"/>
Please schedule Harrisburg hearings for 12 December 19-21, 2006. Also need expedited transcripts		REMARKS:	RECEIVED	
			SEP. 26 2006	
			PA PUBLIC UTILITY COMMISSION	
			SECRETARY'S BUREAU	

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

Name and Telephone Number	Address	Who are you representing?
David B. MacGregor, Esquire	Post & Schell PC Four Penn Center 1600 John F. Kennedy Boulevard <small>City: Philadelphia State: PA Zip: 19103</small>	PPL Electric Utilities Corporation
Telephone: 215-587-1197	E-mail Address: dmacgregor@postschell.com	Fax Number:
Paul E. Russell, Esquire	Two North Ninth Street <small>City: Allentown State: PA Zip: 18101-1179</small>	PPL Electric Utilities Corporation
Telephone: 610-774-4254	E-mail Address: perussell@pplweb.com	Fax Number: 610-774-6726
Kent Murphy, Esquire Adrian Nowak, Esquire Anthony GAY, Esquire	Exelon Business Services Company 2301 Market Street, S-23-1 <small>City: Philadelphia State: PA Zip: 19103</small>	Exelon Corporation, PECO Energy Company, Exelon Generation Company LLC
Telephone: 215-841-4941	E-mail Address: kent.murphy@exeloncorp.com	Fax Number: 215-568-3389

Check this box if additional parties or attendees appear on back of form.

Adrian G. Str... (C.R.C., INC.)

Reporter's Signature

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

DOCUMENT FOLDER

Name and Telephone Number	Address			Who are you representing?
Todd Stewart, Esquire	100 North Tenth Street P.O. Box 1778			Dominion Retail, Inc.
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Telephone: 717-236-1300	E-mail Address: lstewart@hmsk-law.com			Fax Number: 717-236-4841
CORSON@blankrome.com Glenn Thomas, Esquire <i>Stephanie Corson</i>	Blank Rome LLP One Logan Square			Constellation NewEnergy Inc., Constellation Energy Commodities Group Inc.
	City Philadelphia	State PA	Zip 19103	
Telephone: 215-569-5582	E-mail Address: thomas@blankrome.com			Fax Number: 215-569-5555
Kathy J. Kolich, Esquire	76 South Main Street			FirstEnergy Service Company
	City Akron	State OH	Zip 44308	
Telephone: 330-384-3875	E-mail Address: kjkolich@firstenergycorp.com			Fax Number: 330-384-4580
Brian J. Knipe, Esquire	Buchanan Ingersoll & Rooney PC 17 North Second Street, 15 th Floor			Reliant Energy Inc.
	City Harrisburg	State PA	Zip 17101	
Telephone: 717-231-7700	E-mail Address: brian.knipe@bipc.com			Fax Number: 717-231-7712
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
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James Mullins, Esquire	Forum Place, 5 th Floor 555 Walnut Street	Office of Consumer Advocate	
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Telephone: 717-783-5048	E-mail Address: jmullins@paoca.org	Fax Number: 717-783-7152	
Kenneth Mickens, Esquire	P.O. Box 3265	PA Public Utility Commission Office of Trial Staff	
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City Harrisburg	State PA	Zip 17105-3265	
Telephone: 717-787-1976	E-mail Address: kmickens@state.pa.us	Fax Number: 717-772-2677	
Scott Rubin, Esquire	3 Lost Creek Drive	International Brotherhood of Electrical Workers, Local 1600	
	<table style="width: 100%; border: none;"> <tr> <td style="width: 33%; border: none;">City Sellingsgrove</td> <td style="width: 33%; border: none;">State PA</td> <td style="width: 33%; border: none;">Zip 17870</td> </tr> </table>		City Sellingsgrove
City Sellingsgrove	State PA	Zip 17870	
Telephone: 570-743-2233	E-mail Address: scott@publicutilityhome.com	Fax Number: 570-743-8145	

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MP

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Marlane R. Chestnut (PPL, Inc.)


Reporter's Signature

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Pamela C. Polacek, Esquire Adam L. Benshoff, Esquire	McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166	PP&L Industrial Customer Alliance
	City: Harrisburg State: PA Zip: 17108-1166	
Telephone: 717-232-8000	E-mail Address: ppolacek@mwn.com	Fax Number: 717-237-5300
Kevin Moody, Esquire	Wolf Block Schorr and Solis-Cohen LLP 213 Market Street, 9 th Floor	Retail Energy Supply Association, Strategic Energy, Direct Energy Services
	City: Harrisburg State: PA Zip: 17108-0865	
Telephone: 717-237-7187	E-mail Address: kmoody@wolfblock.com	Fax Number: 717-237-2767
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Telephone: 717-255-7641	E-mail Address: parmstrong@ttanlaw.com	Fax Number: 717-236-8278
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	City: Harrisburg State: PA Zip: 17112	
Telephone: 717-541-1101	E-mail Address: ericepstein@comcast.net	Fax Number: 717-541-5487
Steven Gray, Esquire	Suite 1102, Commerce Building 300 North Second Street	Office of Small Business Advocate
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Telephone: 717-783-2525	E-mail Address:	Fax Number: 717-783-2831
Linda Evers, Esquire	FirstEnergy Service Company 2800 Pottsville Pike P.O. Box 16001	Metropolitan Edison Company, Pennsylvania Electric Company
	City: Reading State: PA Zip: 19612	
Telephone: 610-921-6658	E-mail Address: levers@firstenergycorp.com	Fax Number: 610-939-8655
John Hanger, Esquire	610 North Third Street	PennFuture
	City: Harrisburg State: PA Zip: 17101	
Telephone: 717-214-7920	E-mail Address: hanger@pennfuture.org	Fax Number: 717-214-7927

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Name and Telephone Number	Address			Who are you representing?
Michael W. Hassell, Esquire	17 North Second Street, 12 th Floor			PPL Electric Utilities
	City Harrisburg	State PA	Zip 17101-1601	
Telephone: (717) 612-6029	E-mail Address: <u>mhassell@postschell.com</u>			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
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	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
				
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:

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COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
Office of Administrative Law Judge
P.O. BOX 3265, HARRISBURG, PA 17105-3265
September 26, 2006

IN REPLY PLEASE
REFER TO OUR FILE

In Re: P-00062227

(See attached list)

Petition of PPL Electric Utilities Corporation for Approval of a
Competitive Bridge Plan

Hearing Notice

This is to inform you that hearings on the above-captioned case will be held as follows:

Type: Initial and further hearings
Date: Tuesday, December 19, 2006
Wednesday, December 20, 2006
Thursday, December 21, 2006
Time: 10:00 a.m.
Location: Hearing Room 2
Plaza Level
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania
Presiding: Administrative Law Judge Marlane R. Chestnut
1302 Philadelphia State Office Building
1400 West Spring Garden Street
Philadelphia, PA 19130
Telephone: (215) 560-2105
Fax: (215) 560-3133

DOCUMENT KJR
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DOCKETED
NOV 9 2006

If you intend to file exhibits, 2 copies of all hearing exhibits to be presented into evidence must be submitted to the reporter. An additional copy must be furnished to the Presiding Officer. A copy must also be provided to each party of record.

If you are a person with a disability, and you wish to attend the hearing, 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 Chestnut
Office of Trial Staff - 2
Office of Consumer Advocate
Office of Small Business Advocate
FUS, Keystone 3W
Susan Licon
Beth Plantz
Docket Section
Calendar File

SERVICE LIST

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(International Brotherhood of Electrical
Workers, Local 1600)

David M. Kleppinger, Esquire
Pamela C. Polacek, Esquire
Adam L. Benschhoff, Esquire
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Paul E. Russell
Associate General Counsel

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October 2, 2006

DOCUMENT
FOLDER

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

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OCT 02 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. ~~P~~-00062227

P-00062227

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,

A handwritten signature in black ink that reads "Paul E. Russell". The signature is written in a cursive, flowing style.

Paul E. Russell

Attachment

Kevin J. Moody, Esquire
Daniel Clearfield, Esquire
Wolf Block Schorr and Solis-Cohen LLP
213 Market Street, 9th Floor
Harrisburg, PA 17108-0865

Gretchen Schott Esquire
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Linda R. Evers, Esquire
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Kathy J. Kolich, Esquire
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Christopher Lewis, Esquire
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Kent Murphy, Esquire
Adrian Newall, Esquire
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Philadelphia, PA 19103

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112
Pro se

Dated this 2nd day of October, 2006.

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OCT 02 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



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Allentown, PA 18101
(610) 774-4254

Counsel for:
PPL Electric Utilities Corporation



Citizens for Pennsylvania's Future
Regional Enterprise Tower
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Pittsburgh, PA 15219-1853
P 412.258.6680 / 888.895.4843
F 412.258.6685
info@pennfuture.org
www.pennfuture.org

October 6, 2006

ORIGINAL

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

Re: Petition of PPL Electric Utilities Corporation for Approval of a
Competitive Bridge Plan, Docket No. P-00062227

Dear Secretary McNulty:

Enclosed please find an original and three copies of PennFuture's Pre-Hearing Memorandum. These documents were served on all of the parties by electronic service on September 20, 2006. I just discovered that the hard copies of these documents were not deposited in the mail.

If you have any questions, please contact me at (412) 258-6684.

Sincerely,

George Jugovic Jr.
Senior Attorney

cc: All parties

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22

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for approval of a : Docket No. 00062227
Competitive bridge plan :

**PREHEARING MEMORANDUM OF
CITIZENS FOR PENNSYLVANIA'S FUTURE**

Petitioners Citizens for Pennsylvania's Future ("PennFuture") hereby file this Prehearing Memorandum as required by the Order of Administrative Law Judge Marlane R. Chestnut on September 11, 2006.

1. History of the Proceeding

On August 24, 2006 PPL Electric Utilities Corporation (PPL) filed a request for approval of a Competitive Bridge Plan. The Pennsylvania Public Utility Commission (Commission) published notice of the filing in the Pennsylvania Bulletin on August 12, 2006. The notice required that petitions to intervene and protests be filed by August 28, 2006. PennFuture timely filed a Petition to Intervene in this proceeding.

PennFuture will be represented by George Jugovic, Jr. and John Hanger. Service may be made upon:

George Jugovic, Jr.
PA. Bar Id. No. 39586
PennFuture
425 Sixth Avenue, Suite 2770
Pittsburgh, Pennsylvania 15219
Phone: 412-258-6684
Fax: 412-258-6685
Jugovic@pennfuture.org

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2. Issues

Subject to further development of the record through discovery, PennFuture intends to focus its participation on the following:

- a. Whether and how PPL's Competitive Bridge Plan complies with Pennsylvania's Alternative Energy Portfolio Standards Act, 73 P.S. §1648.1 *et seq.*;
- b. Whether and how PPL's Competitive Bridge Plan incorporates energy conservation into its RFP design; and
- c. Whether and how PPL's Competitive Bridge Plan incorporates a voluntary demand response program into the POLR product that will be offered.

3. Witnesses and Testimony

PennFuture has currently identified the following witness:

- a. John Hanger, President and CEO
PennFuture
610 North Third Street
Harrisburg, PA 17101
(717) 214-7920

Mr. Hanger's testimony will address the Alternative Energy Portfolio Standards Act; policy issues related to compliance with that statute; an assessment of whether and the extent to which PPL's Competitive Bridge Plan complies with the statute; the role and benefits of energy conservation in POLR products; an assessment of whether and the extent to which PPL's Competitive Bridge Plan incorporates energy conservation into its RFPs; the role of demand response programs in POLR products;

and an assessment of whether and the extent to which PPL's Competitive Bridge Plan provides products that incorporate a demand response program.

b. PennFuture respectfully reserves the right to identify other expert and non-expert witnesses to provide testimony on these and other issues identified during the course of this proceeding.

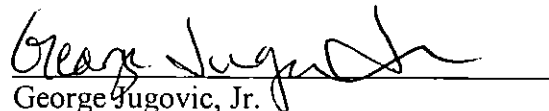
4. Proposed Schedule

PennFuture will cooperate with all interested parties in fashioning an appropriate litigation schedule.

5. Settlement

PennFuture participated in the initial settlement conference, and anticipates further settlement discussions in an attempt to reach amicable resolution of these issues with all parties.

Respectfully submitted,



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DATE: 9/20/06

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I hereby certify that the foregoing documents were served on the participant(s)

PA P.U.C. BUREAU
SECRETARIAL
electronically on

September 20, 2006, and a hard copy followed by first class mail on the date

below :

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[PP&L Ind Cust Alliance]

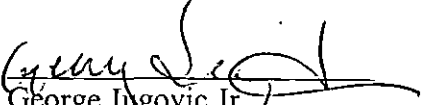
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[FirstEnergy]


George Jugovic Jr.

DATE: 10/10/06



McNees Wallace & Nurick LLC
attorneys at law

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October 6, 2006

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Paul E. Russell, Esquire
Associate General Counsel
PPL Electric Utilities Corporation
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VIA E-MAIL AND FIRST CLASS MAIL

RE: **Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation;**
Docket No. R-00062227

P-00062227


Dear Mr. Russell:

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

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

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

PCP/nk

Enclosures

c: James J. McNulty, Secretary (transmittal letter only)
Certificate of Service

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).

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CERTIFICATE OF SERVICE

Page 2

Docket No. P-00062227

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P.O. Box 9500
Harrisburg, PA 17108-9500

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112



Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

Dated this 6th day of October, 2006, at Harrisburg, Pennsylvania.

Paul E. Russell
Associate General Counsel

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Tel. 610.774.4254 Fax 610.774.6726
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October 16, 2006

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James J. McNulty, Esquire
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Harrisburg, Pennsylvania 17120

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Pennsylvania Public Utility Commission

v.

PPL Electric Utilities Corporation

Docket No. ~~P~~-00062227

P-00062227

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**

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OCT 16 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Pennsylvania Public Utility Commission :
v. : Docket No. R-00062227
PPL Electric Utilities Corporation :

CERTIFICATE OF SERVICE

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 Interrogatories, Set I, Questions 1 through 9, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

FEDERAL EXPRESS

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Eric Joseph Epstein
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Pro se

Dated this 16th day of October, 2006.



Paul E. Russell, Esquire
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Counsel for:
PPL Electric Utilities Corporation

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October 16, 2006

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. R-00062227**

P-00062227

Dear Mr. Kleppinger & Ms. Polacek:

Enclosed are the responses of PPL Electric Utilities Corporation ("PPL Electric") to PP&L Industrial and Customer Alliance's Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of PPL Electric's responses have been served on all active participants in this proceeding.

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PA PUBLIC UTILITY COMMISSION
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Pennsylvania Public Utility Commission :
:
v. :
:
PPL Electric Utilities Corporation :

Docket No. R-00062227

CERTIFICATE OF SERVICE

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 Interrogatories, Set I, Questions 1 through 9, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Eric Joseph Epstein
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Pro se

Dated this 16th day of October, 2006.



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Counsel for:
PPL Electric Utilities Corporation

Paul E. Russell
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October 17, 2006

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

James J. McNulty, Esquire
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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-00062227

P-00062227

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

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Pennsylvania Public Utility Commission :

v. :

PPL Electric Utilities Corporation :

Docket No. ~~P-00062227~~

P-00062227

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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 Interrogatories, Set I, Questions 1 through 24, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Dated this 17th day of October, 2006.



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October 18, 2006

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. R-00062227**

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-00062227
PPL Electric Utilities Corporation :

CERTIFICATE OF SERVICE

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 Interrogatories, Set I, Question 4-Revised, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Pro se

Dated this 18th day of October, 2006.



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Counsel for:
PPL Electric Utilities Corporation

CERTIFICATE OF SERVICE

DOCUMENT
FOLDER

Petition of PPL Electric Utilities :
Corporation for Approval of a : Docket No. P-00062227
Competitive Bridge Plan :

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

Dated this 19th day of October, 2006.

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SERVICE BY E-MAIL and FIRST CLASS MAIL

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Counsel For: *Sustainable Energy Fund Eastern
Pennsylvania*

Gretchen Scott, Senior Counsel
Reliant Energy, Inc.
1000 Main Street
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Counsel For: *Reliant Energy, Inc*

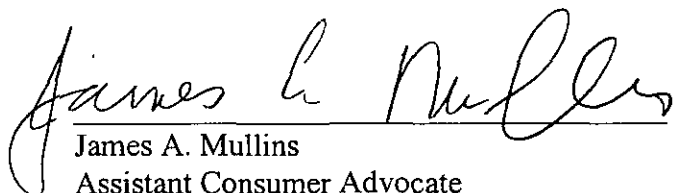
Brian H. Knipe, Esquire
Buchanan Ingersoll & Rooney, PC
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Counsel For: *Reliant Energy, Inc.*

Kent Murphy, Esquire
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00090483.DOC



McNees Wallace & Nurick LLC
attorneys at law

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PAMELA C. POLACEK
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October 20, 2006

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

VIA E-MAIL AND FIRST CLASS MAIL

**RE: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation;
Docket No. R-00062227**

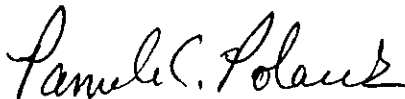
Dear Mr. Russell:

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

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

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

PCP/nk
Enclosures
c: James J. McNulty, Secretary (transmittal letter only)
Certificate of Service

RECEIVED
2006 OCT 20 PM 4:00
PA PUC
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

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

VIA FIRST-CLASS MAIL

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CERTIFICATE OF SERVICE

Page 2

Docket No. P-00062227

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Pamela C. Polacek

Counsel to the PP&L Industrial Customer Alliance

Dated this 20th day of October, 2006, at Harrisburg, Pennsylvania.

ORIGINAL

CERTIFICATE OF SERVICE

DOCUMENT FOLDER

Petition of PPL Electric Utilities Corporation for Approval of a Competitive Bridge Plan : : Docket No. P-00062227

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

Dated this 20th day of October, 2006.

SERVICE BY E-MAIL and INTEROFFICE MAIL

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2006 OCT 20 PM 4:02
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Counsel For: *Reliant Energy, Inc*

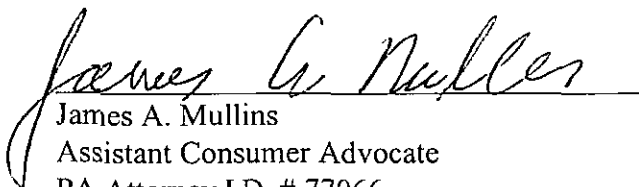
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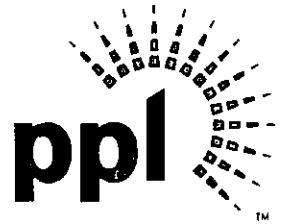
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00090483.DOC

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DOCUMENT
FOLDER

October 23, 2006

FEDERAL EXPRESS

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

RECEIVED

OCT 23 2006

PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. P-00062227**

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

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Daniel Clearfield, Esquire
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Pro se

Dated this 23rd day of October, 2006.



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FEDERAL EXPRESS

October 23, 2006

COPY

RECEIVED

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Harrisburg, PA 17112

OCT 23 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. P-00062227**

Dear Mr. Epstein:

Enclosed are the responses of PPL Electric Utilities Corporation ("PPL Electric") to Eric Joseph Epstein's Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of PPL Electric's responses have been served on all active participants in this proceeding.

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

Very truly yours,

Paul E. Russell

Enclosures

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
v. : Docket No. P-00062227
PPL Electric Utilities Corporation :

CERTIFICATE OF SERVICE

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 16, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Pro se

Dated this 23rd day of October, 2006.



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Counsel for:
PPL Electric Utilities Corporation

Paul E. Russell
Associate General Counsel

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October 23, 2006

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2006 OCT 23 PM 4:06
PA PUC
SECRETARY'S BUREAU

Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. P-00062227

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

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. : Docket No. P-00062227
PPL Electric Utilities Corporation :

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2006 OCT 23 PM 4:06
PA PUC
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

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 16, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Dated this 23rd day of October, 2006.



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ORIGINAL

October 25, 2006

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OCT 25 2006

FEDERAL EXPRESS

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. P-00062227

RJP

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/jrc
Paul E. Russell

Attachment

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
v. : Docket No. P-00062227
PPL Electric Utilities Corporation :

RECEIVED

OCT 25 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

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, Question 4-Revised, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Pro se

Dated this 25th day of October, 2006.



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PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
(610) 774-4254

Counsel for:
PPL Electric Utilities Corporation

Paul E. Russell
Associate General Counsel

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perussell@pplweb.com



ORIGINAL

**DOCUMENT
FOLDER**

October 25, 2006

FEDERAL EXPRESS

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

RECEIVED

OCT 25 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. P-00062227**

RJP

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. :

PPL Electric Utilities Corporation :

Docket No. P-00062227

RECEIVED

OCT 25 2006

CERTIFICATE OF SERVICE

**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 Citizens for Pennsylvania's Future's Interrogatories, Set I, Question 1 through 23, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

FEDERAL EXPRESS

Kenneth L. Mickens, Esquire
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Harrisburg, PA 17120

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2301 Market Street, S-23-1
Philadelphia, PA 19103

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112
Pro se

Dated this 25th day of October, 2006.

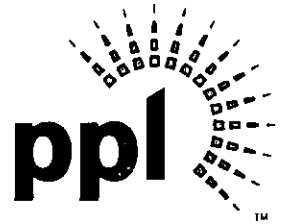


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James J. McNulty, Esquire
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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: **Pennsylvania Public Utility Commission**
v.
PPL Electric Utilities Corporation
Docket No. P-00062227

RJP

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :

v. :

PPL Electric Utilities Corporation :

Docket No. P-00062227

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SECRETARY'S BUREAU**

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October 25, 2006

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

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. P-00062227**

Dear Mr. Mickens:

Enclosed are the responses of PPL Electric Utilities Corporation ("PPL Electric") to the Office of Trial Staff's Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of PPL Electric's responses have been served on all active participants in this proceeding.

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

Very truly yours,

Paul E. Russell
Paul E. Russell

Enclosures

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
v. : Docket No. P-00062227
PPL Electric Utilities Corporation :

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OCT 25 2006

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SECRETARY'S BUREAU**

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Pro se

Dated this 25th day of October, 2006.



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FEDERAL EXPRESS

October 25, 2006

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Pittsburgh, PA 15219

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OCT 25 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. P-00062227**

Dear Mr. Jogovic:

Enclosed are the responses of PPL Electric Utilities Corporation ("PPL Electric") to the Citizens for Pennsylvania's Future's Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of PPL Electric's responses have been served on all active participants in this proceeding.

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

Very truly yours,

Paul E. Russell
Paul E. Russell

Enclosures

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. P-00062227
	:	
PPL Electric Utilities Corporation	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to the Citizens for Pennsylvania's Future's Interrogatories, Set I, Question 1 through 23, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Pro se

Dated this 25th day of October, 2006.



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Counsel for:
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FEDERAL EXPRESS

October 25, 2006

Eric Joseph Epstein
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OCT 25 2006

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

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. P-00062227**

Dear Mr. Epstein:

Enclosed are the responses of PPL Electric Utilities Corporation ("PPL Electric") to Eric Joseph Epstein's Interrogatories identified in the attached Certificate of Service. As indicated in that Certificate of Service, copies of PPL Electric's responses have been served on all active participants in this proceeding.

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

Very truly yours,

Paul E. Russell
Paul E. Russell

Enclosures

cc: Certificate of Service

Kevin J. Moody, Esquire
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Pro se

Dated this 25th day of October, 2006.



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Counsel for:
PPL Electric Utilities Corporation



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

October 26, 2006

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

ORIGINAL

Re: Petition of Equitable Gas Company for Approval to Increase the Level of Funding for its Customer Assistance Program and to Implement an Adjustable Funding Mechanism to Recover Associated Expenses Concerning Universal Service and Energy Conservation Plan Costs

Docket No. P-00062240

Dear Secretary McNulty:

Enclosed for filing please find an original and three (3) copies of the **Answer to Petition** of the Office of Trial Staff (OTS) in the above-captioned proceeding.

As evidenced by the attached Certificate of Service, copies are being served on all parties who were served copies of the Petition.

Sincerely,

Johnnie E. Simms
Chief Prosecutor
Attorney ID #33911

COPY

Enclosure
JES/nhd

- c: Parties of Record
- Chairman Holland
- Vice-Chairman Cawley
- Commissioner Pizzingrilli
- Commissioner Fitzpatrick
- Chief Counsel Pankiw
- Director Walker-Davis

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2006 OCT 32 AM 9:09
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SECRETARY'S BUREAU

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2006 NOV -1 AM 9:17
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22

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

2006 NOV -1 AM 9:17

PA P.U.C.
SECRETARY'S BUREAU

Pennsylvania Public Utility Commission :

v. :

Docket No. P-00062240

Equitable Gas Company :

OFFICE OF TRIAL STAFF'S ANSWER TO EQUITABLE
GAS COMPANY'S PETITION FOR APPROVAL TO
INCREASE THE LEVEL OF FUNDING FOR ITS
CUSTOMER ASSISTANCE PROGRAM AND TO
IMPLEMENT AN ADJUSTABLE FUNDING MECHANISM TO
RECOVER ASSOCIATED EXPENSES CONCERNING UNIVERSAL
SERVICE AND ENERGY CONSERVATION PLAN COSTS

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2006 OCT 32 AM 9:09
PA P.U.C.
SECRETARY'S BUREAU

On October 6, 2006, Equitable Gas Company ("Equitable" or "Company") filed a Petition for Approval to Increase the Level of Funding for Its Customer Assistance Program and to Implement an Adjustable Funding Mechanism to Recover Associated Expenses Concerning Universal Service and Energy Conservation Plan Costs.

Pursuant to 52 Pa. Code Section 5.572(e), the Office of Trial Staff ("OTS") hereby files this timely Answer requesting that the Commission deny the Company's requested relief put forth in its Petition and assign this matter to the Office of Administrative Law Judge. Doing so is warranted because additional time is necessary in order to afford the parties an opportunity to conduct formal and informal discovery and potentially engage in settlement discussions. The opportunity to conduct discovery is essential because the relief requested in the Petition has the potential to dramatically impact Equitable's

residential customers and may alter longstanding Commission policy regarding Customer Assistance Program (“CAP”) benefits. Accordingly, the public interest necessitates a thorough review of the requested relief in order to fully understand the impact on ratepayers and adherence to Commission policy.

As further support to deny this Petition OTS offers the following comments in enumerated fashion:

1. Admitted.
2. Admitted
3. Admitted.

BACKGROUND

4. Admitted.
5. Admitted. However, OTS fails to understand why Equitable failed to propose the significant changes contained in the instant Petition in its Universal Service And Energy Conservation Plan 2007-2009 (“Plan 2007-2009”) filed on May 31, 2006. Equitable had a second opportunity to request these changes in conjunction with the Plan 2007-2009 proceeding because, in the Commission’s Tentative Order, Docket No. M-00061959 entered August 22, 2006, it allowed a thirty day comment period. Equitable availed itself of that opportunity and filed timely comments on September 21, 2006. Approximately two weeks after expiration of the comment period, Equitable filed the instant Petition requesting a significant increase in CAP funding and reconciliation of CAP expenses.

6. Admitted.

7. Admitted.

8. Admitted.

PROPOSED RIDER D-UNIVERSAL SERVICE AND ENERGY CONSERVATION

9. Admitted in part/Denied in part. It is admitted that the Company is seeking Commission approval to implement the Tariff Supplement that adjusts the Company's USECR Rider. It is denied that the Tariff Supplement should become effective on less than statutory notice for service rendered on and after November 1, 2006. Doing so will effectively terminate any chance on behalf of interested parties to conduct formal or informal discovery. By failing to allow for more time, OTS will not have the opportunity to check the accuracy of Equitable's calculations. Accepting Equitable's numbers and calculations as accurate raises concern because, on the face of the Petition, there are several areas that should be clarified. For example, the sales rate from two years ago. This is unusual and OTS would like to question the Company about its accuracy. Additionally, OTS would like the opportunity to verify the numbers imputed for arrearage forgiveness, average usage, average bill, etc.

Allowing additional time is not unprecedented given that in Equitable's Petition, Docket No. R-00032070 Order entered April 1, 2004, which lead to the implementation of Rider D, more time was allotted which ultimately resulted in the parties achieving a full settlement of all issues. That Petition was filed November 21, 2003. On December 22, 2003, the deadline to answer the Petition was extended until January 16, 2004. Thereafter, the parties engaged in settlement discussions and submitted a settlement

petition to the presiding ALJ on February 23, 2004. Likewise, the instant proceeding warrants additional time in order to fully review the Company's proposed tariff changes.

10. Admitted in part/Denied in part. OTS admits that the Company's Attachment 3 provides information required by 52 Pa. Code § 53.52 and that the proposed USECR of \$0.72 represents an increase of \$0.42 to the existing \$0.30 rate. While OTS agrees that the revenue generated from the increase is less than 3% of Equitable's total gross intrastate operating revenue, it is important to note that the increase to residential ratepayers exceeds 3%. Therefore, for all intent and purposes, the proposed changes constitute a Category I increase for the residential customer class. Given the significant impact the proposed rate increase will have on residential customers, it is proper to deny the requested relief and assign this matter to the OALJ for further investigation and review.

11. OTS is without information sufficient to form a belief as to the truth or falsity of the allegation contained in this paragraph. By way of further clarification, OTS has not been provided with sufficient information to ascertain that the \$0.42 per Mcf increase is warranted based on a \$9.4 million CAP deficiency. As previously stated, additional time is necessary to ensure that parties have sufficient time to conduct discovery and test the accuracy of those figures. However, at first glance, the \$0.42 per Mcf increase appears to be overstated given that the current rate of \$0.30 is based on CAP enrollment of 15,000 customers. Equitable's petition states that, as of July 2006, the actual CAP enrollment level is 13,852 customers. Equitable's Petition requests a dramatic increase but is not proposing to expand, or even fully enroll, its current CAP

program. This increase raises serious concerns that, rather than expanding CAP, Equitable is requesting additional funds in order to eliminate the CAP credit limit. Commission regulations, 52 Pa. C.S. § 69.265, provide that gas heating CAP customers should not receive more than \$840 annually in CAP assistance. While OTS has participated in recent proceedings¹ where it endorsed raising the CAP credit limit to account for increases in gas costs, OTS vigorously disagrees with any proposal to eliminate the credit limit entirely. Dominion Peoples requested to do so in a separate proceeding, Docket No. R-00051093², which is currently under review and awaiting a Recommend Decision. Unlike the Dominion Peoples' express request to eliminate the CAP credit, Equitable's Petition does not request outright elimination of the CAP credit; however, the requested \$0.72 rate may effectuate the same result. Because this result is untenable, OTS maintains that additional time is necessary to review the proposal and ensure that the Company's Petition is not a backdoor request to eliminate a significant aspect of Commission endorsed CAP design elements.

12. Denied. OTS maintains that the proposed annual reconciliation of CAP costs is improper. No other utilities are permitted to reconcile CAP costs, and the Company has offered little justification to do so in the instant Petition. OTS opposes reconciliation because, with few exceptions (i.e. purchased fuel expenses pursuant to 66 Pa. C.S. § 1307), traditional ratemaking allows a utility recovery of a particular expense

¹ Petition of UGI Utilities, Inc. – Gas Division to Expand Participation in UGI's Low Income Self-Help Program ("LISHP"), Increase the Maximum Allowed LISHP Discounts and Implement a Funding Mechanism to Recover Certain Associated Costs, Docket Number P-00052190.

² The OTS position on the elimination of CAP credit limit is fully articulated in its Main Brief filed on September 21, 2006 and Reply Brief filed on September 29, 2006.

based on a projection. Reconciliation of CAP costs is not warranted because such costs are not different from any other O&M expense claims and need not be granted special ratemaking treatment. Equitable's CAP is a well established program with easily quantifiable expenses. Therefore, CAP expenses should be treated the same as all other O&M expenses. Given that OTS is not aware of any CAP surcharges in Pennsylvania that permit reconciliation, there is no reason to deviate from traditional ratemaking in the instant proceeding.

Compounding the issue of reconciliation is the fact that Equitable's proposal in no way accounts for the recovery of costs that the Company already receives for its CAP program through base rates and the DROP program, nor for cost savings attributable to CAP expansion since the last base rate case. Given this level of cost recovery, the implementation of Equitable's proposal would impermissibly allow it to actually have the potential to make a profit on its CAP program.

PUBLIC INTEREST

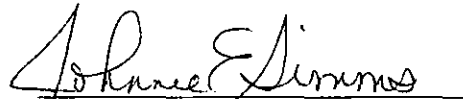
13. Denied. The implementation of the USECR is not in the public interest because OTS and other parties have not had sufficient time to conduct the necessary review. Currently, OTS is not certain that the proposed USECR revenue increase of \$0.72 per Mcf is necessary to allow Equitable recovery of necessary CAP costs. As stated, not only is the \$0.72 overstated because it fails to reflect the appropriate cost savings and current regulatory recoveries, but includes costs (arrearage forgiveness) that may already be recovered in uncollectible accounts expense. In addition, arrearage forgiveness costs have not been determined to be universal service costs. For example,

the CAP filing at Docket No. R-0051093, which is currently before the Commission, was filed by Peoples Natural Gas Co. Peoples Natural Gas is in the process of being acquired by Equitable. Peoples' filing appropriately excludes arrearage forgiveness, as does the other NGDC's with quarterly adjustments. Moreover, the Company avers that the increase is in the public interest because it will allow all eligible low-income customers the opportunity to participate in CAP. This averment implies that not all eligible customers are currently able to enroll in CAP. This is clearly unfounded given that the Company's CAP is under-enrolled because it is authorized to have 15,000 participants but only has an enrollment level of 13,852 customers as of July 2006. Moreover, it must be noted that this is not a CAP expansion proposal; rather, the Company is merely seeking to increase rates to maintain the existing level of CAP participants.

14. Denied. For the reasons previously discussed, the reconciliation of CAP costs proposed in the Petition is improper.

WHEREFORE, the Office of Trial Staff respectfully requests that the Pennsylvania Public Utility Commission deny the relief requested by Equitable Gas Company in the instant Petition and refer this matter to the Office of Administrative Law Judge.

Respectfully submitted,


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

Allison A. Curtin
Prosecutor
PA Attorney I.D. # 93176

Office of Trial Staff
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
(717) 787-1976

Dated: October 26, 2006

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Equitable Gas Company for :
Approval to increase the Level of Funding :
for Its Customer Assistance Program and to : P-00062240
Implement an Adjustable Funding :
Mechanism to Recover Associated :
Expenses Concerning Universal Service and :
Energy Conservation Plan Costs :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Answer to Petition**, dated
October 26, 2006, either personally, by first class mail, electronic mail, express mail
and/or by fax upon the persons listed below:

Thomas T. Niesen, Esquire
Thomas, Thomas, Armstrong & Niesen
212 Locust Street, Suite 500
Harrisburg, PA 17105-3265

Daniel L. Frutchey
Equitable Gas Company
200 Allegheny Center
Pittsburgh, PA 15212

Pamela C. Polacek
Charis Mincavage
Vasiliki Karandrikas
McNees Wallace & Nurick LLC
100 Pine Street

Shaun Sparks, Esq.
Darryl Lawrence, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923

2006 NOV -1 AM 9:17
PA P.U.C.
SECRETARY'S BUREAU

RECEIVED

Sharon E. Webb, Esq.
Steven C. Gray, Esq.
Office of Small Business Advocate
Commerce Building – Suite 1102
300 North 2nd Street
Harrisburg, PA 17101

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

Johnnie E. Simms
Chief Prosecutor
Attorney ID #33911
Office of Trial Staff

Dated: October 26 2006
Docket Nos. P-00062240



ORIGINAL

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

October 27, 2006

RECEIVED
2006 OCT 27 PM 4:00
PA PUBLIC
UTILITY
COMMISSION
SECRETARY'S BUREAU

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

RE: Petition of Equitable Gas Company for
Approval to Increase the Level of Funding
for Its Customer Assistance Program and to
Implement an Adjustable Funding
Mechanism to Recover Associated Expenses
Concerning Universal Service and Energy
Conservation Plan Costs

Docket No. P-00062240

Dear Secretary McNulty:

Enclosed for filing, are an original and three (3) copies of the Answer of the
Office of Consumer Advocate to the Petition of Equitable Gas Company, in the above-referenced
proceeding.

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

Sincerely,

Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824

DOCUMENT
FOLDER

Enclosures
cc: Chief Administrative Law Judge
Parties of Record

00091290.DOC

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PA PUC
SECRETARY'S BUREAU

Petition of Equitable Gas Company for :
Approval to Increase the Level of Funding :
For its Customer Assistance Program and :
To Implement an Adjustable Funding : Docket No. P-00062240
Mechanism to Recover Associated Expenses:
Concerning Universal Service and Energy :
Conservation Plan Costs :

ANSWER OF THE OFFICE OF CONSUMER ADVOCATE
TO THE
PETITION OF EQUITABLE GAS COMPANY

I. INTRODUCTION

On October 6, 2006, Equitable Gas Company (Equitable or Company) filed the above-captioned Petition. Through this Petition, Equitable seeks Pennsylvania Public Utility Commission (Commission) approval to increase the level of funding for its Customer Assistance Program (CAP) and to implement an adjustable funding mechanism to recover associated expenses for Universal Service and Energy Conservation Plan costs. Petition at 1. Equitable currently has in place a Universal Service and Energy Conservation Rider (Rider D) which is set at \$0.30/Mcf. Equitable proposes to reset Rider D to \$0.72/Mcf, a 140% increase, and to make the mechanism adjustable on a quarterly basis and reconcilable annually. Petition at 5.

Prior to filing the instant Petition, Equitable submitted a Universal Service and Energy Conservation Plan 2007-2009 (Plan 2007-2009 or Plan). Plan 2007-2009 proposed modifications to Equitable's existing Energy Assistance Program, including a name change to

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the current Customer Assistance Program, which the Commission approved. Petition at 2. The Commission did not approve Equitable's proposal to increase its minimum CAP payment from \$25 to \$35. Petition at 3. Similarly, the Commission did not approve Equitable's proposal to require an upfront payment from certain customers of no more than \$150 to either enroll or reinstate in CAP. Petition at 4. Accordingly, the Commission issued a Tentative Order approving Plan 2007-2009, directed Equitable to modify its Plan, and provided interested parties an opportunity to comment on the revisions. Petition at 4.

According to Equitable's Petition, the proposed \$0.42/Mcf Rider D increase is to *recover costs associated with a CAP revenue shortfall of \$16,060,120. Petition at Attachment 4, pg. 1.* The OCA has examined the information submitted by the Company in support of its proposed \$0.42/Mcf Rider D surcharge increase. The OCA submits that it is possible that certain costs Equitable seeks to recover through Rider D are already being recovered by Equitable through other rates and charges, and the OCA further submits that certain charges included in Rider D are not appropriate for recovery through such a mechanism. Additionally, the OCA submits that the proposed changes to Rider D to make it adjustable and reconcilable may not be reasonable or appropriate.

For the reasons set forth below, the OCA submits that Equitable's Petition and its proposed Rider D increase should not be approved as filed.

II. ANSWER

Equitable's Petition proposes increasing its current Rider D surcharge from \$0.30/Mcf to \$0.72/Mcf. Petition at 5. The calculation of the proposed Rider D increase is set forth in Attachment 4 of the Petition.

The OCA submits that in its calculation of CAP costs to be recovered in the Rider D surcharge increase, Equitable appears to have included the total costs for a 13,862 participant CAP program, without considering any other sources of funding that are already in place. The OCA submits that the proposed \$0.42/Mcf rate increase proposed for Rider D may result in rates that are unjust and unreasonable. The OCA submits that the Commission should thoroughly consider other funding resources that Equitable already has in place, and as needed, request additional data from Equitable to ensure that only the incremental costs of the CAP are being recovered. In addition, the OCA submits that this proceeding should be assigned to the Office of Administrative Law Judge in order to allow the parties time to conduct discovery as to Equitable's proposed Rider D increase and the underlying costs of its CAP program.

The OCA would also note that Equitable's proposal does not reflect a reasonable offset of costs associated with a 13,862 participant CAP program. The Commission's CAP Policy Statement requires that cost savings be considered in calculating the cost of a CAP program. 52 Pa.Code §69.266. These cost savings include: cash working capital for carrying arrearages, cost of credit and collection activities, and uncollectible expense. *Id.* Equitable will experience cost savings and offsets in the above-mentioned categories from operating a CAP program with 13,682 participants, as opposed to the approximately 10,000 participants that Equitable identified in its 2003 Universal Service and Energy Conservation Plan. Equitable Gas Company's Universal Service and Energy Conservation Plan Submission Pursuant to 52 Pa. Code § 62.4, Docket No. M-00031735 (Order Entered October 30, 2003). The OCA submits that these offsets and savings must be reflected in calculating the true program costs to determine if any additional cost recovery should be allowed.

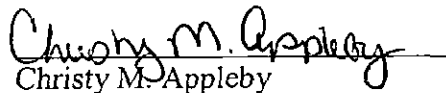
Moreover, under the Settlement Agreement of February 23, 2004, approved by Commission Order entered April 1, 2004, at Docket Number P-00032070, Equitable was to increase its CAP participation level to 15,000 customers. The \$0.30/Mcf Rider D surcharge was enacted to provide cost recovery at that level of participation. Equitable's current CAP participation level is less than 15,000 (only 13,682 customers), and Equitable has provided no basis as to why it should now be permitted to increase its cost recovery or change its surcharge mechanism at this customer participation level.

Finally, the OCA submits that the Company has included costs in its proposal that *are not properly part of the CAP program, such as the PUC assessment on revenue, and other CAP costs that are not properly recovered through a surcharge mechanism.* The Company has also failed to recognize that only incremental costs of the CAP program, if additional recovery is allowed at all, are appropriate for recovery under a surcharge mechanism.

III. CONCLUSION

For the reasons set forth above, the OCA respectfully requests that the Petition of Equitable Gas Company to increase the level of funding for its CAP be denied as filed. The Commission should set this matter for hearings to thoroughly explore the requested increase and changes to the surcharge mechanism.

Respectfully submitted,



Christy M. Appleby

PA Attorney I.D. # 85824

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Darryl Lawrence

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Fax: 717-783-7152

Date: October 27, 2006

00091289.DOC

ORIGINAL

CERTIFICATE OF SERVICE

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2006 OCT 27 PM 4: 01
PA PUC
SECRETARY'S BUREAU

Petition of Equitable Gas Company :
for Approval to Increase the Level :
of Funding for Its Customer Assistance :
Program and to Implement an Adjustable : Docket No. P-00062240
Funding Mechanism to Recover Associated :
Expenses Concerning Universal Service :
and Energy Conservation Plan Costs :

I hereby certify that I have this day served a true copy of the foregoing document, Answer of the Office of Consumer Advocate to the Petition of Equitable Gas Company, 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 27th day of October 2006.

SERVICE BY E-MAIL and INTEROFFICE MAIL

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Harrisburg, PA 17105-3265


SERVICE BY E-MAIL and FIRST CLASS MAIL

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Thomas, Thomas, Armstrong & Niesen
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Counsel for: *Equitable Gas Company, a
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Advocate*

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Charis Mincavage, Esquire
Vasiliki Karandrikas, Esquire
McNees, Wallace & Nurick, LLC
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Counsel for: *People/Equitable Merger
Intervenors*


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October 30, 2006

FEDERAL EXPRESS

**DOCUMENT
FOLDER**

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OCT 30 2006

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. P-00062227**

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

Kevin J. Moody, Esquire
Daniel Clearfield, Esquire
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Harrisburg, PA 17108-0865

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FirstEnergy Service Company
2800 Pottsville Pike
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Kathy J. Kolich, Esquire
FirstEnergy Service Company
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Akron, OH 44308

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Adrian Newall, Esquire
Exelon Business Services Company
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Philadelphia, PA 19103

Eric Joseph Epstein
4100 Hillsdale Road
Harrisburg, PA 17112
Pro se

Dated this 30th day of October, 2006.



Paul E. Russell, Esquire
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
(610) 774-4254

Counsel for:
PPL Electric Utilities Corporation

Hawke
 McKeon
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 Kennard LLP
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October 30, 2006

VIA ELECTRONIC AND FIRST CLASS MAIL

DOCUMENT
FOLDER

Honorable Marlane R. Chestnut
Administrative Law Judge
Pa. Public Utility Commission
1302 Philadelphia State Office Building
1400 West Spring Garden Street
Philadelphia, PA 19130

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation;
Docket No. P-00062227; **NOTIFICATION REGARDING WITNESS**

Dear Judge Chestnut:

The purpose of this letter is to notify you regarding Dominion Retail, Inc.'s witness, pursuant to your Prehearing Order No. 2 dated September 27, 2006 in the above-captioned matter. Dominion Retail's witness will be:

Thomas J. Butler
Director, Business Development
Dominion Retail, Inc.
1201 Pitt Street
Pittsburg, PA 15221
(412) 473-4165
Thomas_J_Butler@dom.com

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2006 OCT 31 AM 8:18
H.A.P.U.C.
SECRETARY'S BUREAU

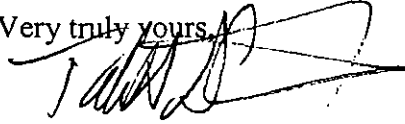
Mr. Butler's testimony will address those issues raised by Dominion Retail in its Prehearing Memorandum dated September 20, 2006 including but not limited to: 1) the premature nature of PPL's Petition; 2) the fact that the PPL's Competitive Bridge Plan will not allow PPL to acquire electric energy at prevailing market prices or pass through prevailing

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

market prices to customers as required by statute; and, 3) the harm which is likely to result to the competitive market if PPL's CBP is approved as filed.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "Todd S. Stewart", written over the text "Very truly yours,".

Todd S. Stewart
Counsel for Dominion Retail, Inc.

TSS/clb

cc: James J. McNulty, Secretary

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND FIRST CLASS MAIL

Hon. Marlane R. Chestnut
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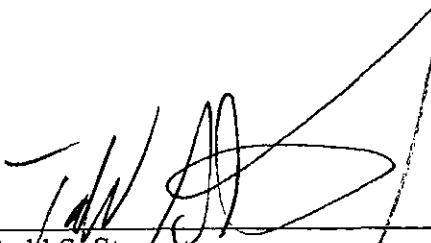
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Todd S. Stewart

Dated this 30th day of October, 2006.

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F.D.C.
SECRETARY'S BUREAU

Phone: (215) 569-5582
Fax: (215) 832-5582
Email: Thomas@BlankRome.com

November 1, 2006

VIA E-MAIL & FIRST-CLASS MAIL

The Honorable Marlane Chestnut
Pennsylvania Public Utility Commission
1302 Philadelphia State Office Building
1400 West Spring Garden Street
Philadelphia, PA 19130

**DOCUMENT
FOLDER**

Re: Petition of PPL Electric Utilities Corporation for Approval for a
Competitive Bridge Plan; Docket No. P-00062227

Dear Judge Chestnut:

Pursuant to Prehearing Order #2, Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc. may offer direct testimony from the witnesses below. In light of on-going settlement discussions and discovery, a final decision on which, if any, witnesses will be submitting testimony has not been made at this time.

W. Scott Miller
Vice President
Constellation NewEnergy, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202

Marjorie Philips
Vice President
Constellation Energy Commodities Group
111 Market Place, Suite 500
Baltimore, MD 21202

Consistent with Constellation's pre-hearing memorandum dated September 19, 2006, these witnesses may address the following issues:

- a. Whether the proposed Competitive Bridge Plan meets the "prevailing market price" standard in Section 2807(e)(3) of the Public Utility Code.
- b. Whether it is necessary and appropriate for the Commission to approve in 2007 a plan for POLR service for 2010 and prior to the promulgation of the POLR regulations.

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ROME ^{LLP}
COUNSELORS AT LAW

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SECRETARY'S BUREAU

The Honorable Marlane Chestnut
November 1, 2006
Page 2

- c. Whether the proposed master supply agreement contains terms and conditions that will promote fair and effective competition in the Commonwealth
- d. Whether the proposed treatment of residential, commercial and industrial consumers will foster the competition envisioned by the Electric Generation Competition and Choice Act
- e. Whether the tariff changes proposed by PPL are just and reasonable.
- f. Whether the consumer education program proposed by PPL will adequately inform consumers of the changes to their electric service.
- g. Any other issues that may arise upon further review of the filing and discovery.

Please feel free to contact me should you have any questions.

Respectfully submitted,

Glen R. Thomas
Counsel for Constellation

GRT/de
Enclosures

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code §1.54.

VIA EMAIL and FIRST CLASS MAIL

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Honorable Marlane R. Chestnut
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Glen R. Thomas
Blank Rome, LLP

Counsel for Constellation

DATED: November 1, 2006

213 Market Street, 9th Floor, P.O. Box 865, Harrisburg, PA 17108-0865
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Kevin J. Moody
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SECRETARY'S

November 1, 2006

VIA EMAIL & FIRST CLASS MAIL

Hon. Marlane R. Chestnut
Administrative Law Judge
PA PUC
1302 Philadelphia South Office Bldg.
1400 W. Spring Garden St.
Philadelphia, PA 19130

DOCUMENT
FOLDER

Re: Petition of PPL Electric Utilities Corporation for Approval
of a Competitive Bridge Plan, Docket No. P-00062227

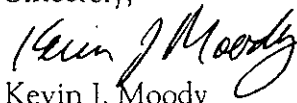
Dear Judge Chestnut:

Pursuant to your Prehearing Order #2, please be advised that the Retail Energy Supply Association ("RESA") intends to co-sponsor Reliant Energy witness James A. Ajello, Senior Vice President, 1000 Main Street, Houston, TX 77002 (713-497-3870) in this proceeding.

RESA understands that Mr. Ajello intends to address the following subjects in his testimony:

- The appropriate market-responsive pricing model for default service to large commercial and industrial customers.
- The appropriate market-responsive pricing model for default service to small and mid-sized commercial and residential customers.
- The proposed Generation Rate Adjustment.
- The proposed Generation Supply Charge and reconciliation mechanism.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM/jls

cc: Certificate of Service
James J. McNulty

HAR:69323.1/MID051-238938

RJP

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing Letter upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

VIA EMAIL & FIRST CLASS MAIL

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November 2, 2006

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NOV 02 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. P-00062227**

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

DOCUMENT
FOLDER

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NOV 02 2006

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Pennsylvania Public Utility Commission :
v. : Docket No. P-00062227
PPL Electric Utilities Corporation :

CERTIFICATE OF SERVICE

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 II, Questions 1 through 4, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

FEDERAL EXPRESS

Kenneth L. Mickens, Esquire
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Pro se

Dated this 2nd day of November, 2006.



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November 6, 2006

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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. P-00062227**

Dear Mr. McNulty:

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

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

Very truly yours,

Paul E. Russell

Attachment

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :

v. :

PPL Electric Utilities Corporation :

Docket No. P-00062227

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NOV 06 2006

CERTIFICATE OF SERVICE

**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 Reliant Energy, Inc.'s Interrogatories, Set I, Questions 1 through 6, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Eric Joseph Epstein
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Harrisburg, PA 17112
Pro se

Dated this 6th day of November, 2006.

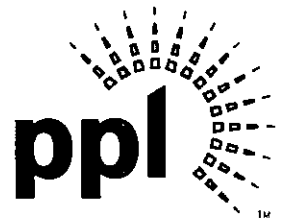


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November 6, 2006

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**DOCUMENT
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**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. P-00062227**

Dear Mr. McNulty:

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

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

Very truly yours,

Paul E. Russell

Attachment

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :

v. :

PPL Electric Utilities Corporation :

Docket No. P-00062227

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CERTIFICATE OF SERVICE

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 Small Business Advocate's Interrogatories, Set I, Questions 1 through 6, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Pro se

Dated this 6th day of November, 2006.



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Counsel for:
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November 10, 2006

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**DOCUMENT
FOLDER**

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. P-00062227**

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.

KJR

Very truly yours,

Paul E. Russell

Attachment

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
v. : Docket No. P-00062227
PPL Electric Utilities Corporation :

CERTIFICATE OF SERVICE

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

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Pro se

Dated this 10th day of November, 2006.



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

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November 14, 2006

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

**DOCUMENT
FOLDER**

**Re: Pennsylvania Public Utility Commission
v.
PPL Electric Utilities Corporation
Docket No. P-00062227**

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

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NOV 15 2006

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. P-00062227
	:	
PPL Electric Utilities Corporation	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the responses of PPL Electric Utilities Corporation to Reliant Energy, Inc.'s Interrogatories, Set III, Questions 1 through 2, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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425 Sixth Avenue, Suite 2770
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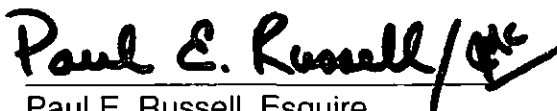
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Pro se

Dated this 14th day of November, 2006.



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Glen R. Thomas

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DOCUMENT
FOLDER

November 14, 2006

RECEIVED
2006 NOV 16 AM 8:40
PA P.U.C.
SECRETARY'S BUREAU

Honorable Marlane R. Chestnut
Administrative Law Judge
Pennsylvania Public Utility Commission
1302 Philadelphia State Office Building
1400 West Spring Garden Street
Philadelphia, PA 19130

RE: Petition of PPL Electric Utilities Corporation for Approval of a Competitive Bridge Plan; Docket No. P-00062227

Dear Judge Chestnut:

In accordance with the procedural schedule, please be advised that the Constellation New Energy and Constellation Energy Commodities Group ("Constellation") will not be filing direct testimony in the above-referenced proceeding. Constellation reserves the right, however, to submit rebuttal and surrebuttal testimony and to participate in the hearings and briefings of this matter.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this letter. If you have any questions, please contact me.

Respectfully submitted,

Blank Rome LLP



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(215) 832-5793

cc: James J. McNulty, Secretary
All parties on attached Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Petition of PPL Electric Utilities :
Corporation for Approval of a : Docket No. P-00062227
Competitive Bridge Plan :

CERTIFICATE OF SERVICE

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

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Glen R. Thomas
Blank Rome, LLP

Counsel for Constellation New Energy and
Constellation Energy Commodities Group

DATED: November 14, 2006

DOCUMENT

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BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. P-00062227
 :
 PPL Electric Utilities Corporation :

CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of the testimony of Irena M. Prezelj, on behalf of FirstEnergy Solutions Corp., on the Administrative Law Judge's assistant by electronic mail, the parties of record listed below by electronic and first class mail, and the Administrative Law Judge Chestnut by first class mail this 15th day of November, 2006, in accordance with the requirements of § 1.54 (relating to service by a participant) and Judge Chestnut's Prehearing Order No. 2:

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Pro se

Dated this 15th day of November, 2006.



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November 15, 2006

VIA FIRST CLASS MAIL

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SECRETARY'S BUREAU

2006 NOV 15 PM 3:46

Re: Petition of PPL Electric Utilities Corporation for Approval of Competitive Bridge Plan; Docket No. P-00062227; **DIRECT TESTIMONY OF THOMAS J. BUTLER ON BEHALF OF DOMINION RETAIL**

Dear Judge Chestnut:

Enclosed are two (2) copies of the Prepared Direct Testimony of Thomas J. Butler on behalf of Dominion Retail, Inc. As indicated by the attached Certificate of Service, all parties to this proceeding are being served both electronically and by First Class Mail. As per the instructions in your Prehearing Hearing Order No. 2, I have not included Your Honor on the electronic distribution list but have included Kathy Niesborella.

If there are any difficulties with this document or if you have any questions, please do not hesitate to contact me.

Very truly yours,


Todd S. Stewart

Counsel for Dominion Retail, Inc.

TSS/kml

cc: James J. McNulty, Secretary (cover letter only)
Kathleen Niesborella (via electronic mail only)
Thomas J. Butler
Gary Jeffries, Esquire

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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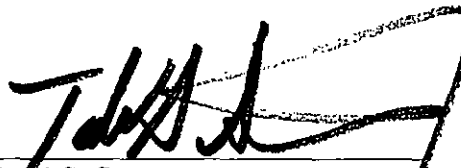
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Todd S. Stewart

Dated this 15th day of November, 2006.



THOMAS, THOMAS,
ARMSTRONG & NIESEN

Attorneys and Counsellors at Law

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November 15, 2006

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Honorable Marlane R. Chestnut
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Pennsylvania Public Utility Commission
1302 Philadelphia State Office Building
1400 West Spring Garden Street
Philadelphia, PA 19130

In re: Petition of PPL Electric Utilities Corporation for Approval of a
Competitive Bridge Plan
Docket No. P-00062227

Dear Judge Chestnut:

Enclosed on behalf of The Sustainable Energy Fund of Central Eastern Pennsylvania, please find SEF Statement No. 1 and attached SEF Exhibit No. 1, the Prepared Direct Testimony and Exhibit of Dr. Rex A. D'Agostino, in the above referenced proceeding. A copy of SEF Statement No. 1 with SEF Exhibit No. 1 has been served on the parties in accordance with the attached Certificate of Service.

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

Sincerely,

THOMAS, THOMAS, ARMSTRONG & NIESEN

By

Michael L. Swindler

Encl.

cc: Certificate of Service
James J. McNulty, Secretary
(Letter and Certificate of Service only)
Dr. Rex A. D'Agostino

061115 ALJ Chestnut (Direct Testimony).wpd

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities : **Docket No. P-00062227**
Corporation for Approval of a :
Competitive Bridge Plan :

CERTIFICATE OF SERVICE

I hereby certify that I have this 15th day of November, 2006, served a true and correct copy of SEF Statement No. 1 and SEF Exhibit No. 1, the Prepared Direct Testimony and Exhibit of Dr. Rex A. D'Agostino, in the above proceeding, upon the persons and in the manner indicated below:

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November 15, 2006

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VIA HAND DELIVERY

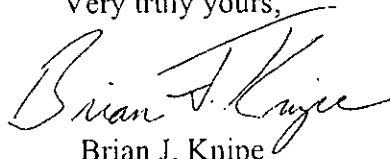
The Honorable Marlane R. Chestnut
Administrative Law Judge
Pennsylvania Public Utility Commission
1302 Philadelphia State Office Building
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Philadelphia, PA 19130

Re: Petition of PPL Electric Utilities Corporation for Approval of a
Competitive Bridge Plan, Docket No. P-00062227

Dear Judge Chestnut:

On behalf of Reliant Energy, Inc. ("Reliant") I have enclosed ~~three~~ (3) copies of the Direct Testimony of James A. Ajello, Reliant Statement No. 1. We have served copies of this document on the parties to this proceeding in accordance with the attached Certificate of Service.

Very truly yours,



Brian J. Knipe

For BUCHANAN INGERSOLL & ROONEY, P.C.

BJK/eh

cc: James J. McNulty, Secretary (transmittal letter and Certificate of Service only, by hand delivery)
Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

2006 NOV 15 PM 3:34
SECRETARY'S BUREAU

Re: Petition of PPL Electric Utilities :
Corporation for Approval of a : Docket No. P-00062227
Competitive Bridge Plan :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Direct Testimony of James A. Ajello, Reliant Statement No. 1, 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 15th day of November 2006.

**EMAIL AND FIRST CLASS MAIL,
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November 15, 2006

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Petition of PPL Electric Utilities Corporation for Approval
of Competitive Bridge Plan, Docket No. P-00062227

Dear Secretary McNulty:

On behalf of Direct Energy Services, LLC, enclosed for filing please find an original and three copies of its Motion for Leave to Present Testimony with regard to the above-referenced matter. A copy has been served in accordance with the Certificate of Service.

**DOCUMENT
FOLDER**

Very truly yours,

Daniel Clearfield
Daniel Clearfield

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

DC/lww

cc: Hon. Marlane R. Chestnut w/enc.
Cert. of Service w/enc.

HAR:69683.1/MID051-238938

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Petition of PPL Electric Utilities Corporation :
for Approval of a Competitive Bridge Plan : Docket No. P-00062227
:

DIRECT ENERGY SERVICES, LLC
MOTION FOR LEAVE TO PRESENT TESTIMONY

Direct Energy Services, LLC ("Direct Energy") hereby submits this Motion for Leave to Present Testimony, pursuant to 52 Pa. Code § 5.103 and in support states as follows:

1. Prehearing Order #2 dated September 22, 2006, granted the petition of Direct Energy to Intervene/Protest Out of Time in this proceeding and, as a result, Direct became a party in this action. Prehearing Order #2, ¶ 14.
2. Direct Energy is licensed by the Commission at No. A-110164 to provide electricity and related services to all classes of retail customers throughout Pennsylvania. Direct's primary area of focus is residential and mass market (small business) customers. Direct Energy has a unique business model, and extensive experience in providing energy services to residential and small commercial customers, among others. Direct offers retail energy customers many products including fixed-price and price protection programs.
3. By Prehearing Order #2 in this matter, the Administrative Law Judge ("ALJ") directed that witnesses not identified in a party's prehearing memorandum or listed in a required November 1, 2006 notice would not be permitted to testify without special permission from the ALJ for good cause.
4. While as of November 1, Direct Energy had not planned on submitting its own witness, changed circumstances now require that it do so.

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5. Direct Energy coordinated its litigation with other parties that have the same or similar interests and did not expect to file direct testimony in this case. Therefore, Direct did not identify any witnesses.

6. After having an opportunity to review the testimony proposed by others, Direct believes that no party is addressing in detail the impact of PPL's Competitive Bridge Plan Proposal on PPL's residential and small commercial customers. This is a critical element of the markets and the record needs to be complete in this area. Direct Energy's primary area of concern is the residential retail generation market and Direct Energy witness Lacey is intimately versed in the facts and policy issues associated with default service procurement and pricing plans. Accordingly, it is appropriate for a Direct Energy witness to address these issues and to present detailed information about the facts and circumstances associated with the development of default service pricing plans for residential and small commercial customers both here in Pennsylvania and in other jurisdictions.

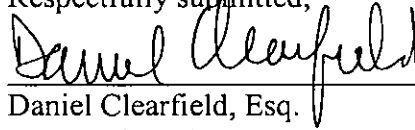
7. Without this input, the record in this matter will not be complete as it otherwise would be, thus depriving the ALJ and the Commission of all the information necessary to make an informed decision in the public interest.

8. This testimony is being filed within the deadlines set forth for submission of testimony in this proceeding, and, as of today, to Direct's knowledge, neither PPL nor any other party has conducted any discovery on the witnesses listed on November 1, 2006. Accordingly, no other party will be unreasonably prejudiced by this request.

9. Therefore, Direct requests that the ALJ find good cause to accept the testimony of Frank P. Lacey on behalf of Direct Energy Services, LLC, a party to this proceeding.

WHEREFORE, Direct Energy Services, LLC respectfully requests that the Administrative Law Judge find good cause to accept the attached testimony of Frank Lacey and grant this Motion for Leave to Present Testimony.

Respectfully submitted,



Daniel Clearfield, Esq.

Deanne O'Dell, Esq.

Wolf, Block, Schorr and Solis-Cohen LLP

213 Market Street, 9th Fl.

Harrisburg, PA 17108-0865

(717) 237-7173

Dated: November 15, 2006

Counsel for the Direct Energy Services, LLC

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CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing Motion for Public Access to Present Testimony of Frank Lacey upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

PA PUBLIC ACCESS TO PRESENT
TESTIMONY COMMISSION
SECRETARY'S BUREAU

VIA EMAIL & FIRST CLASS MAIL

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Daniel Clearfield

Date: November 15, 2006

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November 20, 2006

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DOCUMENT
FOLDER

Re: Dominion Retail, Inc. v. PPL Electric Utilities Corporation; Docket No. P-00062227; **DOMINION RETAIL, INC.'S RESPONSES TO PPL ELECTRIC CORPORATION'S INTERROGATORIES SET I**

Dear Mr. Hassell:

Enclosed please find Dominion Retail, Inc.'s Responses to PPL Electric Corporation's Interrogatories Set I. Please note that because of the number and size of the attachments, we are providing hard copy of the attachments only to PPL. If any other party would like me to provide hard copies, please let me know and I will be glad to do so.

If you have any questions with regard to these Responses, please direct them to me. Thank you for your attention to this matter.

Sincerely,



Todd S. Stewart
Counsel for Dominion Retail, Inc.

TSS/bks
Enclosures

2006 NOV 22 PM 1:33
SECRETARY'S BUREAU

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

**DOMINION RETAIL, INC.'S
RESPONSES TO
PPL ELECTRIC UTILITIES CORPORATION'S
INTERROGATORIES SET I**

Docket No. P-00062227

Answered By: Todd S. Stewart, Counsel

1. Please provide a list (including name of agency, subject matter of testimony and date of submittal) of all written or transcribed testimony, and associated exhibits, presented by Mr. Thomas J. Butler in any proceeding since January 1, 2001. Identify any written testimony that may have been prepared and circulated to parties even if not formally submitted for the record.

RESPONSE:

Mr. Butler provided the following testimony before the Pennsylvania Public Utility Commission:

Duquesne Light Company Petition for Approval of Plan for Post Transition POLR Service, Docket No. P-00032071

- Direct Testimony (February 25, 2004) addressing the impact of Duquesne's proposal on EGSS and proposed modifications to that plan.
- Rebuttal Testimony (March 17, 2004) responding the OCA witness Montalvo's suggestion that proposed rates were too high.

Petition of Pennsylvania Power Company for Approval of Interim POLR Supply Plan, Docket No. P-00052188

- Direct Testimony (December 2005) addressing the proposal to reconcile the rates of the interim plan and criticizing the term of the proposed plan.
- Surrebuttal Testimony (January 5, 2005) responding to various witnesses' criticism of Mr. Butler's proposals.

Pennsylvania Public Utility Commission, et al v. Equitable Gas Company, Docket No. R-00016132

- Direct Testimony (May 15, 2001) addressing impact of several proposals made by Equitable Gas Company in its 1307(f) filing on Dominion Retail's gas business.

**DOMINION RETAIL, INC.'S
RESPONSES TO
PPL ELECTRIC UTILITIES CORPORATION'S
INTERROGATORIES SET I**

Docket No. P-00062227

Answered By: Todd S. Stewart, Counsel

2. Please provide copies of all testimony, comments and briefs submitted by Dominion in any electric proceeding before the Pennsylvania Public Utility Commission during the past three years with respect to Provider of Last Resort issues.

RESPONSE: See Attached

Duquesne Light Company Petition for Approval of Plan for Post Transition POLR Service,
Docket No. P-00032071

- Direct Testimony of Thomas J. Butler
- Rebuttal Testimony of Thomas J. Butler
- Main Brief of Dominion Retail
- Reply Brief of Dominion Retail
- Supplemental Brief of Dominion Retail
- Supplemental Brief of Dominion Retail

Petition of Pennsylvania Power Company for Approval of Interim POLR Supply Plan, Docket
No. P-00052188

- Direct Testimony of Thomas J. Butler
- Surrebuttal Testimony Thomas J. Butler
- Main Brief of Dominion Retail
- Reply Brief of Dominion Retail

Implementation of the Alternative Energy Portfolio Standards Act, Docket No. M-00051865

- Comments of Dominion Retail

*Rulemaking Re: Electric Distribution Companies' Obligation to Service Retail Customers at the
Conclusion of the Transition Period Pursuant to 66 Pa. C.S. § 2897(e)(2),* Docket No.
L-00040169

- Comments of Dominion Retail

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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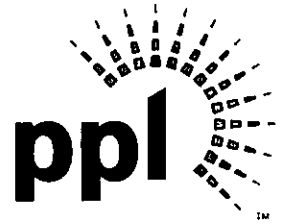
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Todd S. Stewart

Dated this 22nd day of November, 2006.

Paul E. Russell
Associate General Counsel

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November 20, 2006

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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. P-00062227**

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,

A handwritten signature in black ink that reads "Paul E. Russell". The signature is written in a cursive, flowing style.

Paul E. Russell

Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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NOV 20 2006

Pennsylvania Public Utility Commission

v.

PPL Electric Utilities Corporation

:
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:

Docket No. P-00062227

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

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 II, Questions 1 through 11, upon the active participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Dated this 20th day of November, 2006.



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Counsel for:
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VIA FEDERAL EXPRESS

November 22, 2006

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PA PUBLIC UTILITY COMMISSION
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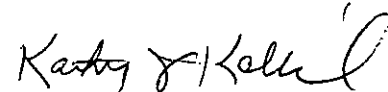
Re: **Pennsylvania Public Utility Commission**
v.
PPL Electric Utilities Corporation
Docket No. R-00062227

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 FirstEnergy Solutions Corp. served today on the active participants in this proceeding.

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

Very truly yours,



Attachment

cc: All active parties of record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :

v. :

Docket No. R-00062227

PPL Electric Utilities Corporation :

CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of the Responses of FirstEnergy Solutions Corp to PPL Electric Utilities Corporation's Interrogatories, Set I, upon the active participants listed below by electronic mail (Responses and Attachments) and by U.S. mail, postage prepaid (Responses without attachments) this 22 day of November, 2006, in accordance with the requirements of § 1.54 (relating to service by a participant):

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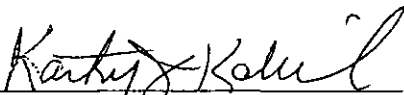
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DOCUMENT
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2006 NOV 22 PM 1:54
SECRETARY'S BUREAU

Petition of PPL Electric Utilities :
Corporation for Approval of a : Docket No. P-00062227
Competitive Bridge Plan :

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

Dated this 22nd day of November, 2006.

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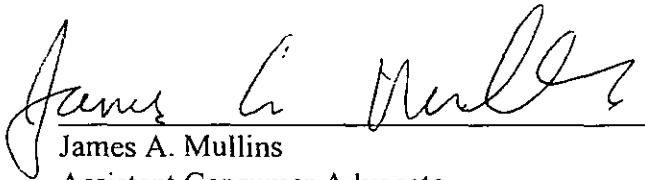
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November 27, 2006

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VIA HAND DELIVERY

Michael W. Hassell
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17 North Second Street
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Harrisburg, PA 17101-1601

In re: Petition of PPL Electric Utilities Corporation for Approval of Competitive Bridge Plan
Docket No. P-00062227

Dear Mr. Hassell:

Enclosed are the answers of the Sustainable Energy Fund of Central Eastern Pennsylvania to PPL Electric Utilities Corporation's Interrogatories and Requests for Production of Documents, Set I in the above-referenced proceeding. Copies of these answers have been served in accordance to the attached Certificate of Service.

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

Sincerely,

THOMAS, THOMAS, ARMSTRONG & NIESEN

By 
Michael L. Swindler
PA Attorney ID No. 43319

Enclosures

cc: James J. McNulty, Secretary (letter and certificate of service only)
Certificate of Service
Dr. Rex D'Agostino (w/encl.)

KJR

F:\CLIENTS\UTILITY\PPLEU Sustainable Energy\PPLEU Bridge Petition\Letters\061127 Letter to M. Hassell.wpd

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities : Docket No. P-00062227
Corporation for Approval of a :
Competitive Bridge Plan :**

CERTIFICATE OF SERVICE

I hereby certify that I have this 27th day of November, 2006, served a true and correct copy of the answers of the Sustainable Energy Fund of Central Eastern Pennsylvania to PPL Electric Utilities Corporation's Interrogatories and Requests for Production of Documents, Set I, in the above proceeding, upon the persons and in the manner indicated below:

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CERTIFICATE OF SERVICE

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NOV 27 2006

PA PUBLIC UTILITY COMMISSION
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Petition of PPL Electric Utilities :
Corporation for Approval of a : Docket No. P-00062227
Competitive Bridge Plan :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate Responses to PPL Electric Utilities Corporation Interrogatories Set I, number 1, 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 27th day of November, 2006.

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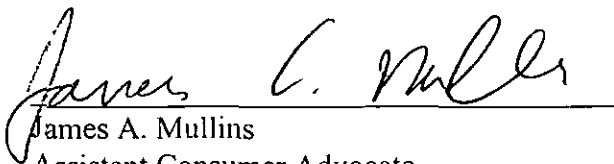
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CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities Corporation for Approval of a Competitive Bridge Plan : : Docket No. P-00062227

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate Responses to PPL Electric Utilities Corporation Interrogatories Set I, number 2, 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 28th day of November, 2006.

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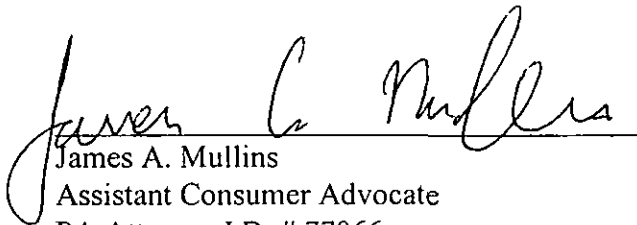
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November 30, 2006

VIA EMAIL & FIRST CLASS MAIL

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Re: Petition of PPL Electric Utilities Corporation for Approval
of a Competitive Bridge Plan, Docket No. P-00062227

Dear Mr. Hassell:

Enclosed please find Direct Energy's Responses to PPL Electric Utilities Corporation's Interrogatories and Requests for Production of Documents, Set II, in the above-matter.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM/jls
Enclosures

cc: Certificate of Service (w/encs)
James McNulty (Cert. of Service only)

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SECRETARY'S BUREAU

HAR:69953.1/MID051-238938

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing Interrogatory Responses, Set II, Nos. 1-6, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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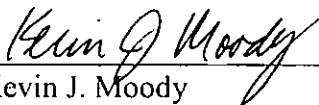
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Kevin J. Moody

Date: November 30, 2006

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November 30, 2006

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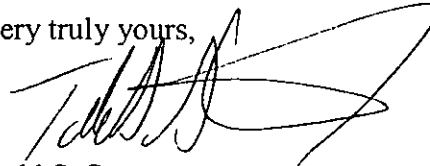
Re: Dominion Retail, Inc. v. PPL Electric Utilities Corporation; Docket No. P-00062227; **DOMINION RETAIL, INC.'S RESPONSES TO PPL ELECTRIC UTILITIES CORPORATION'S INTERROGATORIES & REQUEST FOR PRODUCTION OF DOCUMENTS, SET II**

Dear Mr. Hassell:

Enclosed please find Dominion Retail, Inc.'s Responses to PPL Electric Corporation's Interrogatories and Request for Production of Documents, Set II.

If you have any questions with regard to these Responses, please direct them to me. Thank you for your attention to this matter.

Very truly yours,



Todd S. Stewart
Counsel for Dominion Retail, Inc.

TSS/bks

Enclosures

cc: James McNulty, Secretary (cover ltr. And COS only)
Per Certificate of Service

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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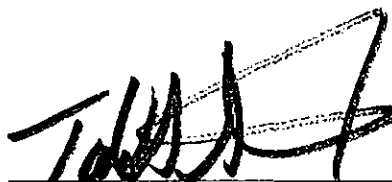
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Todd S. Stewart

Dated this 30th day of November, 2006.

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December 1, 2006

DOCUMENT
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Michael W. Hassell, Esquire
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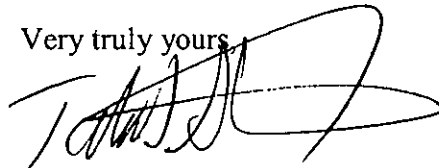
Re: Petition of PPL Electric Utilities Corporation; Docket No. P-00062227;
**DOMINION RETAIL, INC.'S CORRECTED RESPONSE TO PPL
ELECTRIC UTILITIES CORPORATION'S INTERROGATORY, SET II,
NUMBER 4**

Dear Mr. Hassell:

Enclosed please find a corrected copy of Dominion Retail, Inc.'s Response to PPL Electric Corporation's Interrogatory, Set II, Number 4. The response to Number 4, which was circulated yesterday, was in error. A word was missing. The corrected version includes the missing word in bold.

If you have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Very truly yours,



Todd S. Stewart
Counsel for Dominion Retail, Inc.

TSS/bks
Enclosures

cc: James McNulty, Secretary (cover ltr. and COS only)
Per Certificate of Service

SECRETARY'S BUREAU
2006 DEC -1 PM 4:12

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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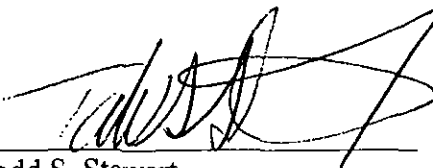
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Todd S. Stewart

Dated this 1st day of December, 2006.



THOMAS, THOMAS,
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Attorneys and Counsellors at Law

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2006 DEC -4 AM 9:38
SECRETARY'S BUREAU

December 1, 2006

VIA EMAIL AND HAND DELIVERY

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**DOCUMENT
FOLDER**

In re: Petition of PPL Electric Utilities Corporation for Approval of Competitive Bridge Plan
Docket No. P-00062227

Dear Mr. Hassell:

Enclosed are the answers of the Sustainable Energy Fund of Central Eastern Pennsylvania to PPL Electric Utilities Corporation's Interrogatories and Requests for Production of Documents, Set II in the above-referenced proceeding. Copies of these answers have been served in accordance to the attached Certificate of Service.

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

Sincerely,

THOMAS, THOMAS, ARMSTRONG & NIESEN

By

Michael L. Swindler
PA Attorney ID No. 43319

Enclosures

cc: James J. McNulty, Secretary (letter and certificate of service only)
Certificate of Service
Dr. Rex D'Agostino (w/encl.)
Art Morris (w/encl.)

F:\CLIENTS\UTILITY\PPLEU Sustainable Energy\PPLEU Bridge Petition\Letters\061201 Letter to M. Hassell.wpd

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED - 4 11 9: 30
SECRETARY'S BUREAU

Petition of PPL Electric Utilities : Docket No. P-00062227
Corporation for Approval of a :
Competitive Bridge Plan :

CERTIFICATE OF SERVICE

I hereby certify that I have this 1st day of December, 2006, served a true and correct copy of the answers of the Sustainable Energy Fund of Central Eastern Pennsylvania to PPL Electric Utilities Corporation's Interrogatories and Requests for Production of Documents, Set II, in the above proceeding, upon the persons and in the manner indicated below:

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December 4, 2006

RECEIVED
2006 DEC -6 PM 1:40
PPL'S BUREAU
SECRETARY'S BUREAU

VIA FIRST CLASS MAIL

Mr. James J. McNulty,
Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation re: Petition of PPL Electric Utilities Corporation for Approval of A Competitive Bridge Plan, Docket No. P-00062227

Dear Secretary McNulty:

Enclosed for filing, in accordance with Section 1.24 of the Public Utilities Code, please find an original and three copies of a Notice of Appearance for myself, Stephanie Corson, for the above-captioned matter, and the associated Certificate of Service.

Respectfully submitted,



STEPHANIE CORSON

DOCUMENT
FOLDER

SC/eal
Enclosure

cc: The Honorable Marlane R. Chestnut, Administrative Law Judge
Certificate of Service

ORIGINAL

COMMONWEALTH OF PENNSYLVANIA

BEFORE THE PENNSYLVANIA PUBLIC
UTILITY COMMISSION

RECEIVED
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SECRETARY'S BUREAU

PETITION OF PPL ELECTRIC
UTILITIES CORPORATION

Docket No. P-00062227

FOR APPROVAL OF A COMPETITIVE
BRIDGE PLAN

NOTICE OF APPEARANCE

TO THE SECRETARY:

Please enter my appearance in the above-designated matter on behalf of Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc. (jointly known as "Constellation"). I am authorized to accept service on behalf of said party in this matter.

I am already receiving or have access to a copy of each document issued by the Commission on this matter and do not on the basis of this notice require an additional copy.

DOCUMENT
FOLDER

DOCKETED
DEC 07 2006

By:



STEPHANIE CORSON (I.D. NO. 204184)
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One Logan Square
Philadelphia, PA 19103
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215-569-5555

Dated: December 4, 2006

CERTIFICATE OF SERVICE

I, STEPHANIE CORSON, hereby certify that on December 4, 2006, I caused a true and correct copy of the Notice of Appearance to be served by first class mail, postage prepaid, and electronic mail on the following persons:

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PA PUBLIC
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COMMISSION
SECRETARY'S BUREAU

2006 DEC -6 PM 1:40

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Dated: December 4, 2006

Docket No. P-00062227

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December 6, 2006

VIA UPS-OVERNIGHT

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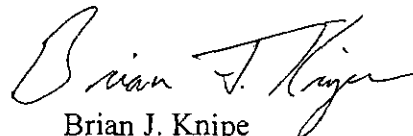
RECEIVED
SECRETARY'S BUREAU
DEC 6 2006 11:35

Re: Petition of PPL Electric Utilities Corporation for Approval of a
Competitive Bridge Plan, Docket No. P-00062227

Dear Judge Chestnut:

On behalf of Reliant Energy, Inc. ("Reliant"), I have enclosed two (2) copies of the Rebuttal Testimony of James A. Ajello, Reliant Statement No. 1-R. We have served copies of this document on the parties to this proceeding in accordance with the attached Certificate of Service.

Very truly yours,



Brian J. Knipe

For BUCHANAN INGERSOLL & ROONEY, P.C.

BJK/eh

Enclosures

cc: James J. McNulty, Secretary (transmittal letter and Certificate of Service only, by hand delivery)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Petition of PPL Electric Utilities :
Corporation for Approval of a : Docket No. P-00062227
Competitive Bridge Plan :

2006-12-06 P: 3:51
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Rebuttal Testimony of James A. Ajello, Reliant Statement No. 1-R, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 6th day of December 2006.

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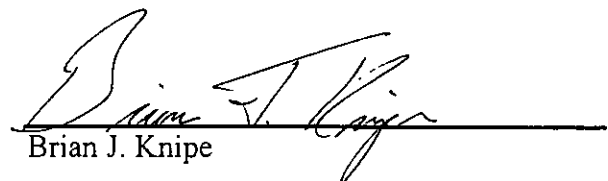
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December 6, 2006

VIA ELECTRONIC AND FIRST CLASS MAIL

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2600 EDC-3 211 E 14
SECRETARY'S BUREAU

Re: **PETITION OF PPL ELECTRIC UTILITIES CORPORATION FOR APPROVAL OF A COMPETITIVE BRIDGE PLAN; Docket No. P-00062227**

Dear Judge Chestnut:

The purpose of this letter is to inform your Honor that Dominion Retail, Inc., will not be submitting rebuttal testimony in the above-referenced proceeding. Dominion Retail, Inc., reserves its ability to submit rebuttal testimony and to participate fully in any and all future activities in this case.

As indicated by the attached Certificate of Service, all parties have been served with copies of this letter. If you have any questions regarding this notification, please do not hesitate to contact me.

Very truly yours,



Todd S. Stewart
Counsel for Dominion Retail, Inc.

TSS/bks

cc: James J. McNulty, Secretary

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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Todd S. Stewart

Dated this 6th day of December, 2006.

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December 6, 2006

The Honorable Marlane Chestnut
Administrative Law Judge
Pennsylvania Public Utility Commission
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Philadelphia, PA 19130

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation re: Petition of PPL Electric Utilities Corporation for Approval of a Competitive Bridge Plan, Docket No. P-00062227

Dear Judge Chestnut:

Please be advised that Constellation New Energy, Inc. and Constellation Energy Commodities Group, Inc. ("Constellation") will not be submitting rebuttal testimony in the above-reference proceeding. Constellation reserves the right to submit surrebuttal testimony and participate in all other aspects of this proceeding.

Respectfully submitted,

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Petition of PPL Electric Utilities :
Corporation for Approval of a : Docket No. P-00062227
Competitive Bridge Plan :

CERTIFICATE OF SERVICE

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

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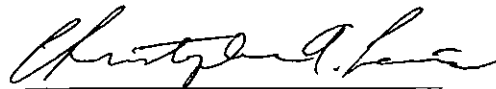
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DATED: December 6, 2006

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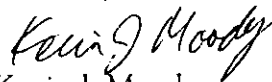
Re: Petition of PPL Electric Utilities Corporation for Approval
of a Competitive Bridge Plan, Docket No. P-00062227

Dear Judge Chestnut:

Enclosed please find a copy of Frank Lacey's Rebuttal Testimony for Direct Energy Services, LLC, in the above-referenced matter.

If you have any questions, please contact me at your convenience.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM/jls

cc: Certificate of Service
James J. McNulty (Cert. of Service only)

SECRETARY'S BUREAU

2006 DEC -7 AM 9:45

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CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing Rebuttal Testimony upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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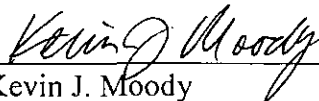
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RE: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation re: Petition of PPL Electric Utilities Corporation for Approval of A Competitive Bridge Plan, Docket No. P-00062227

Dear Judge Chestnut:

Enclosed, please find the Rebuttal Testimony and Exhibits of Douglas A. Krall, Joseph Cavicchi, Joseph M. Kleha and Timothy R. Dahl on behalf of PPL Electric Utilities Corporation in the above-referenced proceeding. As indicated on the enclosed certificate of service, copies have been served on the parties in the manner indicated.

Respectfully submitted,

Michael W. Hassell

MWH:skr

cc: James J. McNulty
Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Docket No. P-00062227

PPL Electric Utilities Corporation

Statement No. 1-R

Rebuttal Testimony of Douglas A. Krall

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SECRETARY'S BUREAU

1 Q. Please state your full name and business address.

2 A. My name is Douglas A. Krall. My business address is Two North Ninth Street,
3 Allentown, Pennsylvania, 18101.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by PPL Electric Utilities Corporation ("PPL Electric" or the
6 "Company") a subsidiary of PPL Corporation. I work in the Asset Management
7 Department of PPL Electric and my title is Manager – Regulatory Strategy.

8 Q. Have you provided testimony previously in this proceeding?

9 A. Yes, I have. I provided written direct testimony that was designated as
10 Statement No. 1. I also provided Exhibits DAK1 and 2. My direct testimony
11 addressed the following:

- 12 1. An overview of PPL Electric's Competitive Bridge Plan ("CBP");
- 13 2. The Company's proposals in the CBP to enhance its existing demand side
14 response ("DSR") programs;
- 15 3. The Company's proposal in the CBP for a three-year consumer education
16 program beginning in 2007.

17 Q. Please describe the purpose of your rebuttal testimony.

18 A. The purpose of my rebuttal testimony and Exhibit DAK 3 is to address issues
19 raised by other parties regarding the following:

- 20 1. The non-precedential nature of the CBP.
- 21 2. Pricing for the Large Commercial and Industrial Class of customers.
- 22 3. Pricing for the Residential and Small Commercial and Industrial Classes of
23 customers.

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- 4. Issues related to the consumer education program proposed in the CBP.
- 5. Issues related to demand side response programs.
- 6. Issues related to the procurement of resources to meet the requirements of the Alternative Energy Portfolio Standards (AEPS) Act.

In considering these issues, I will be addressing the direct testimony of the following witnesses:

- Sustainable Energy Fund of Central Eastern Pennsylvania's (SEF) witness Dr. Rex D'Agostino
- Citizens for Pennsylvania's Future (PennFuture) witness Dr. Thomas Tuffey
- Office of Consumer Advocate (OCA) witness Dr. Steven Estomin
- Direct Energy Services, LLC (Direct Energy) witness Mr. Frank Lacey
- PP&L Industrial Customer Alliance (PPLICA) witness Mr. Kevin Wilkie
- Reliant Energy, Inc. (Reliant) witness Mr. James Ajello
- First Energy Solutions Corp. (FES) witness Ms. Irena Prezelj
- Dominion Retail, Inc. (Dominion) witness Mr. Thomas Butler

Before responding to these specific issues, however, I would like to summarize PPL Electric's efforts to balance the interests of all stakeholders in this proceeding and its efforts to narrow or eliminate contested issues.

Q. Please describe how PPL Electric attempted to balance the interests of the stakeholders in this proceeding.

1 A. As shown by the direct testimony submitted by the other parties in this
2 proceeding, there are significant differences of opinion regarding fundamental
3 aspects of obtaining Provider of Last Resort ("POLR") supply and recovering the
4 costs of POLR service from customers. These differences arise from the
5 absence of binding precedent or regulations regarding POLR service. PPL
6 Electric's CBP strikes an appropriate balance among these competing interests
7 by providing consumers with market-based POLR service that takes into account
8 current policy debates, and provides the opportunity for Electric Generation
9 Suppliers ("EGSs") to enter the market. The objective of the CBP is to provide
10 market-based POLR service that reasonably accommodates the expiration of the
11 current rate capped generation services on December 31, 2009. PPL Electric's
12 CBP achieves this objective by defining POLR services that align customers'
13 future generation prices with the actual demands that they place upon the
14 electricity system while recognizing that customers' POLR rates need not be
15 highly volatile to be market based. Moreover, given PPL Electric's installation of
16 an Automated Meter Reading ("AMR") system for all its customers and software
17 that turns that system into an Advanced Metering Infrastructure ("AMI"), the ability
18 for retail competitors to use these data to develop and offer a variety of
19 alternative services to POLR is greatly enhanced, encouraging retail competition.
20 Contrary to the positions of some parties to this proceeding, PPL Electric's CBP
21 will result in the provision of basic POLR service at market based prices and
22 allow for increased retail competition.

23

1 Q. How has PPL Electric attempted to narrow the issues in this proceeding?

2 A. At a conceptual level, the Company attempted to incorporate in its filing POLR
3 procurement processes and documents that have been previously approved in
4 Pennsylvania or other jurisdictions. For example, the proposed Request for
5 Proposals process and Supplier Master Agreement are based upon documents
6 previously approved in Maryland. After the CBP was filed, PPL Electric and all of
7 the other major parties engaged in a series of comprehensive settlement
8 discussions. Although a global settlement could not be reached, these
9 discussions were very valuable in identifying areas of agreement and issues on
10 which parties were willing to compromise. Based on discussions with intervening
11 parties and further analysis of its proposals, the Company has further narrowed
12 the number and scope of contested issues in its rebuttal testimony.

13
14 Q. Please describe how the Company's rebuttal testimony further narrows the
15 issues.

16 A. In its rebuttal testimony, wherever possible, the Company accepted positions
17 reflected in other parties' direct testimony. In several instances, PPL Electric
18 could accommodate other parties' concerns simply by withdrawing a proposal
19 included in the CBP. In other instances the Company has proposed
20 modifications to its CBP in an effort to offer a compromise. In its rebuttal
21 testimony, the Company has agreed to:

22 (1) Confirm that its proposed CBP is non-precedential and is intended to apply
23 to POLR supply only during 2010 (Mr. Krall);

- 1 (2) Comply with final POLR regulations prospectively to the extent such
2 regulations apply to PPL Electric in 2010 (Mr. Krall);
- 3 (3) Amend the procurement of supply for customers in the Large Commercial
4 and Industrial Customer Class to provide for one solicitation in October
5 2009 and to permit customers to "opt in" to fixed price POLR service within
6 30 days thereafter (Mr. Krall);
- 7 (4) Withdraw its proposed modification of the Generation Rate Adjustment
8 ("GRA") to apply the GRA to customers in the Large Commercial and
9 Industrial Customer Class "opting in" to fixed price POLR supply for 2010
10 (Mr. Kleha);
- 11 (5) Permit shopping by customers in the Large Commercial and Industrial
12 Customer Class without limitations other than compliance with the
13 Commission's switching rules and the Company's tariff, including the
14 existing GRA (Mr. Krall);
- 15 (6) Withdraw its proposed modification of the Transmission Service Charge
16 ("TSC") to include in the TSC indirect transmission service charges from
17 suppliers and amend the bid process to provide that PPL Electric will incur
18 transmission costs for POLR supply (Mr. Kleha);
- 19 (7) Limit rate dislocation by phasing-in the design of Rate Schedule RTS by
20 maintaining the absolute difference in 2009 average generation rates
21 between Rate Schedules RTS and RS. This modification is contingent
22 upon the Commission granting reconciliation of the GSC (Mr. Krall);

- 1 (8) Facilitate a collaborative effort to develop a more detailed consumer
2 education program and to address the timing of consumer education
3 expenditures (Mr. Krall);
- 4 (9) Begin collecting and organizing customer data in 2007 and provide bidders
5 and suppliers with relevant customer volume and usage information
6 beginning in 2010 (Mr. Krall);
- 7 (10) Identify and provide notice, as part of the Company's consumer education
8 program, of available DSM programs to customers representing the top
9 10% of peak load in each Customer Class (Mr. Krall).
- 10 (11) Include the Company's entire 2010 AEPS solar set aside obligation for
11 customers in the Residential and Small Commercial and Industrial
12 Classes in the two solicitations scheduled to occur in 2007 (Mr. Krall);
- 13 (12) Confirm the Company's intent to recover the cost of universal service
14 programs only from customers in the Residential Customer Class (Mr.
15 Dahl);
- 16 (13) Confirm the Company's intent to recover the cost of universal service
17 programs through a base rate proceeding or any available cost recovery
18 option under the Commission's CAP Policy Statement (Mr. Dahl);

19
20 Q. What does the Company hope to achieve through this modification of its CBP?

21 A. While we were not able to achieve a global settlement, PPL Electric believes that
22 the above concessions should bring the parties' positions much closer together
23 and significantly limit the number of contested issues. PPL Electric asks that the

1 parties carefully review these concessions and to the extent possible accept
2 them, in surrebuttal testimony, as a reasonable resolution of this proceeding.

3
4 Q. Recognizing this effort by PPL Electric to accommodate the concerns of other
5 parties, what issues remain contested in this proceeding?

6 A. Although many additional details are discussed in the testimony submitted by the
7 intervening parties and several small issues may remain outstanding, only three
8 fundamental issues remain unresolved. Those issues are: (1) the use of a
9 multiple year procurement process to obtain residential and small commercial
10 and industrial POLR supply for 2010, (2) the appropriate structure for POLR rates
11 for large commercial and industrial customers, and (3) reconciliation of PPL
12 Electric's POLR rates. Given the narrow scope of this proceeding as a 2010
13 bridge to full statewide competition and given the significant concessions made
14 by PPL Electric in its rebuttal testimony, we believe we have significantly
15 narrowed the remaining scope of this proceeding.

16
17 Q. Please elaborate on what you mean by the very narrow scope of PPL Electric's
18 proposals?

19 A. First, as I just discussed, PPL Electric believes the issues in this proceeding have
20 been narrowed to only three major areas of contention. Second, contrary to the
21 assertions of Mr. Butler, testifying on behalf of Dominion Retail, Inc., the
22 Company is not proposing to utilize the CBP as its long-term POLR plan. The
23 Company has repeatedly stated, and I reiterate, the CBP is intended to apply

1 solely to procurement of POLR supply for calendar year 2010. Beginning
2 January 1, 2011, PPL Electric anticipates that its procurement of POLR supply
3 will be part of a statewide process established by the Commission's final POLR
4 regulations. Third, contrary to the assertions of Mr. Ajello, testifying on behalf of
5 Reliant Energy, Inc., and Mr. Butler, PPL Electric is not attempting to establish
6 Commission precedent in this filing. In fact, the Company's proposal in this filing
7 to issue a series of RFPs to obtain POLR supply for 2010 is not consistent with
8 its preferred approach for the long-term. PPL Electric believes, as clearly stated
9 in its comments before the Commission's En Banc Hearing on Policies to Mitigate
10 Potential Electricity Price Increases (Docket No. M-00061957), that the
11 Commission's POLR regulations should establish a statewide descending clock
12 auction that all Pennsylvania EDCs will use to obtain POLR supply beginning in
13 2011.

14
15 Q. What are the implications of this narrow perspective?

16 A. There are several. The CBP, as its name implies, is intended simply to create a
17 bridge from the end of PPL Electric's transition period on December 31, 2009 to
18 the end of transition periods for the other major EDCs on December 31, 2010.
19 The CBP is not intended to apply beyond December 31, 2010 and, as has been
20 the case for other EDCs' interim POLR mechanisms, is not intended as a
21 precedent for future POLR procurement. Thus, in its review of PPL Electric's
22 CBP, the Commission can focus solely on the issue of POLR supply for 2010.
23 The termination of PPL Electric's POLR rate caps on December 31, 2009, will

1 mark the end of a 14-year period of rate stability. Since 1996, the Company's
2 POLR rates have changed only to reflect slight adjustments permitted by its
3 restructuring settlement. Those rates have not increased to reflect rising costs or
4 rising market prices. A bridge during 2010 from the Company's POLR rate caps
5 to market prices will assist all stakeholders in making the adjustment to full
6 market prices in 2011. In my opinion, the CBP is a reasonable and appropriate
7 mechanism for addressing fundamental POLR issues and facilitating that bridge
8 to 2011.

9
10 Q. Earlier you discussed the Company's AMR system and efforts the Company has
11 underway to evolve that system into an AMI system. Could you please describe
12 these systems and how they support the Company's CBP proposal?

13 A. Starting in 2002 and concluding in 2004, PPL Electric undertook an upgrade of
14 its 1.3 million meters with meters capable of being read remotely and the
15 installation of a communications infrastructure capable of reading those meters
16 and acquiring usage data. Completion of this AMR project, at a capital cost of
17 about \$160 million, permitted the Company to eliminate manual meter reading,
18 reduce the need for field visits, and reduce the effort required to address high
19 usage inquiries. As described in testimony during PPL Electric's most recent
20 distribution rate case (Docket No. R-00049255), that project provided expense
21 reductions associated with these functions that more than offset the cost of the
22 project. Building on this platform, the Company currently is installing a meter
23 data management system that includes the following:

- 1 - A customer interface that will permit customers to analyze and better
- 2 understand their electricity usage and bills,
- 3 - A data repository capable of storing two years of hourly reads from all
- 4 customers,
- 5 - A complex billing engine that will be capable of billing customers using
- 6 hourly data, and
- 7 - A settlement system that will permit customers' usage to be settled
- 8 using their actual hourly data rather than load profile information.

9 The installation of these additional capabilities will provide PPL Electric's
10 customers with understanding and tools that will permit them to manage their
11 consumption of electricity and their electric bills in a market environment.

12 Customers will be able to understand how their usage varies, how hourly prices
13 vary, and identify ways that they may reduce or shift their usage to their own
14 economic benefit. The Company expects that the availability of hourly data for
15 customers interested in shopping, coupled with the opportunity for suppliers to
16 serve the customers' actual load rather than a load profile, will result in more
17 competitive offers, more opportunities for customers to save money, and an
18 increase in shopping. Finally, with better data and an opportunity to serve actual
19 usage, the Company expects that suppliers will be better able to offer customers
20 a variety of demand-side programs. The Company expects to begin to roll out
21 these capabilities in phases during 2007 and 2008. The CBP's consumer
22 education program is designed to dovetail with that roll-out. The demand side
23 programs included in the CBP are intended to generate customer interest and to

1 serve as an educational tool without displacing the opportunity for retail suppliers
2 to offer other more comprehensive or tailored programs. The procurement and
3 pricing proposed in the CBP are intended to produce alternatives against which
4 customers can begin to understand market pricing, and evaluate energy
5 efficiency, conservation, and shopping opportunities.
6

7 **Pricing for Large Commercial and Industrial Customers**

8 Q. A number of witnesses have commented on PPL Electric's proposed pricing for
9 the Large Industrial and Commercial Class of customers. Could you briefly
10 summarize the concerns that have been raised?

11 A. Yes. Mr. Wilkie (on behalf of PPLICA - page 4 line 5) and Ms. Prezelj (on behalf
12 of FES – page 4 line 22) both object to PPL Electric's proposal that customers in
13 the Large Customer and Industrial Class make a binding election to receive
14 fixed-price service in late 2008 and prior to knowing the price of that service. Mr.
15 Wilkie also recommends that PPL Electric be directed to include in its tariff a
16 formula for any hourly service and that the Company be directed to offer day-
17 ahead hourly service.
18

19 Mr. Ajello (on behalf of Reliant - page 15 line 18) and Ms. Prezelj (on behalf of
20 FES – page 5 line 18) both propose that PPL Electric not offer fixed price service
21 to customers in the Large Customer and Industrial Class and, instead, offer only
22 hourly service.
23

1 Q. Please respond to the proposals of Reliant and FES that Large C&I customers
2 receive only real time hourly POLR service from PPL Electric.

3 A. I have several concerns with this proposal. First, it is unprecedented in
4 Pennsylvania. All of the major utilities in the Commonwealth currently offer a
5 fixed price option of some kind to their largest customers. Most of these utilities'
6 plans are in place through 2010. I see no reason why PPL Electric should be
7 required to be the only major EDC in Pennsylvania to offer only hourly POLR
8 service to its customers.

9
10 Second, the Reliant/FES proposal fails to reflect the bridge nature of PPL
11 Electric's CBP. As I explained above, PPL Electric's customers, including its
12 Large Commercial and Industrial customers, have received service pursuant to
13 capped generation rates since 1996. After 14 years of service under rate caps,
14 surely some bridge is appropriate, rather than jumping immediately and
15 precipitously to real time hourly rates as the only available POLR option. PPL
16 Electric's proposal to provide a fixed price option for Large Commercial and
17 Industrial customers for 2010 reflects a reasonable compromise bridge proposal
18 and should be approved.

19
20 Third, the Reliant/FES proposal fails to recognize the types of customers
21 included in PPL Electric's Large Commercial and Industrial category. The Large
22 Commercial and Industrial category includes those customers taking service
23 under Rate Schedules LP-4, LP-5, LP-6, and their interruptible counterparts

1 (Rate Schedules IS-P, IS-T and miscellaneous other interruptible rates). While
2 the largest customers, those on LP-5 and LP-6, have had hourly metering for
3 many years and generally have the sophistication to deal with hourly prices, this
4 is not the case for those customers on LP-4. For example, PPLICA witness Mr.
5 Wilkie states in his testimony (page 3 line 3) that even though his firm, Mount Joy
6 Wire, has been served under an interruptible rate (Rate Schedule IS-T), the
7 nature of Mount Joy's operations is such that, in Mr. Wilkie's words, "(W)e have
8 only limited ability to respond to market price fluctuations for electricity." Indeed,
9 Mr. Wilkie's statement is consistent with the nature of PPL Electric's Rate
10 Schedule IS-T which limits, yearly and monthly, the number of interruptible
11 events to which a customer is exposed. Furthermore, the population of
12 customers served under PPL Electric's Rate Schedule LP-4 includes hospitals,
13 schools, government buildings, and others that will be unable to respond to
14 hourly prices. It may be, of course, that the retail market will offer these
15 customers a fixed price alternative, but it would be very risky to assume that this
16 will occur immediately following an extended period during which rates have
17 been capped. A fixed price option, as a one-year bridge, is a reasonable and
18 appropriate protection.

19
20 Q. Please respond to the concern that under PPL Electric's proposal, Large
21 Commercial and Industrial customers will not know the price they will pay for
22 service before they are required to opt in to POLR service.

1 A. The purpose of PPL Electric's proposal was not to hide the price from customers,
2 but simply to acquire POLR power in more than one solicitation to protect against
3 price volatility, and to bid out a known amount of load and load shape in order to
4 reduce the risk that wholesale suppliers would face and, thereby, keep prices
5 more reasonable. However, having reviewed the concerns expressed by various
6 parties, particularly those of the large customer group (i.e., PPLICA) PPL Electric
7 has decided to revise its proposal. Specifically, PPL Electric proposes to
8 conduct a single solicitation for fixed price service for Large Commercial and
9 Industrial customers for 2010. The solicitation would take place in October
10 2009. Interested Large Commercial and Industrial customers would sign up for
11 this solicitation in advance. PPL Electric will conduct the solicitation and inform
12 customers of the resulting prices. Customers would then have 30 days to select,
13 or "opt in" to, the fixed price service for 2010. Those customers who do not sign
14 up for the solicitation and those customers who sign up for the solicitation but do
15 not accept the price resulting from the solicitation will receive real time hourly
16 service for 2010 as their POLR default service.

17
18 In addition, as explained in Mr. Kleha's rebuttal testimony, the Company, again
19 responding to concerns expressed by several parties, is withdrawing its proposed
20 revisions to the Generation Rate Adjustment (GRA). Large Commercial and
21 Industrial customers, including those who sign up for fixed price service, will be
22 free to shop in 2010 without restriction, except that (1) they must comply with the
23 existing GRA; (2) they must comply with existing switching rules which require

1 that retail suppliers provide notice of a customer's desire to leave POLR at least
2 16 days prior to the meter reading when the change in supplier is to take effect;
3 and (3) if they wish to return to POLR they cannot return to fixed price service
4 and must, instead, take real-time hourly POLR service.
5

6 I believe that this revised proposal reflects a reasonable compromise of the
7 competing positions advanced by the parties on this issue and should be
8 approved.
9

10 Q. FES contends (page 6 line 1) that all large customers should be included in the
11 fixed price pool and that they be required to "opt in" to hourly service. How does
12 the Company respond to that proposal?

13 A. As a general rule, large customers should be more sophisticated in their energy
14 purchases and, therefore, a default to hourly pricing is not unreasonable. FES
15 expresses the concern that customers may inadvertently be placed on a service
16 "that they more than likely do not want." PPL Electric's proposal to provide
17 education on the options available to them, solicit customer interest in a fixed
18 price service, and then seek confirmation from those customers after the price of
19 that service has been determined should minimize the possibility of customers
20 making uninformed decisions.
21

1 Q. Please respond to the proposal that PPL Electric be required to provide a
2 detailed formula for its real time hourly default service for Large Commercial and
3 Industrial customers.

4 A. I do not think a formula is necessary. PPL Electric, unlike Duquesne Light
5 Company, is not proposing to directly offer and administer a real time hourly
6 POLR service option. Rather, PPL Electric is proposing to bid this service out
7 and simply pass through the costs to customers. Under this approach, a detailed
8 formula is unnecessary. Instead, PPL Electric will define the service being
9 provided by an EGS (e.g., real-time hourly zonal price and then relevant capacity
10 and ancillary services prices) and request that the EGSs indicate what they want
11 to be paid to provide the service, taking on all PJM obligations that may arise
12 through its provision (except for transmission charges). In this way, PPL Electric
13 will not need to be responsible for detailed PJM accounting requirements and will
14 simply be the transmission and distribution company.

15
16 **Pricing for Residential and Small Commercial and Industrial Customers**

17 Q. A number of witnesses have commented on PPL Electric's proposed pricing for
18 the Residential and Small Commercial and Industrial classes of customers.
19 Could you briefly summarize the concerns that have been raised?

20 A. Yes. Both Mr. Ajello (on behalf of Reliant – page 10 line 7) and Mr. Lacey (on
21 behalf of Direct Energy – page 2 line 10) contend that it is premature to establish
22 any pricing structure for Residential and Small Commercial and Industrial
23 customers and, instead, PPL Electric should wait for the issuance of the

1 Commission's POLR rules and request a pricing structure consistent with the
2 rules. In the alternative, Mr. Lacey recommends that PPL Electric be directed to
3 implement a "monthly market pricing model". Other witnesses on behalf of EGSs
4 have expressed other criticisms of the CBP solicitations.

5
6 Dr. Estomin (on behalf of OCA) objects (page 12 line 12) to a single flat cent per
7 kWh rate for all customers; proposing instead that customers currently being
8 served under Rate Schedules RS and RTD be grouped together, but that
9 customers served under Rate Schedule RTS be maintained separately and that
10 their rate continue to be discounted relative to the other residential customers. In
11 addition, Dr. Estomin recommends (page 17 line 1) that, instead of flat cent per
12 kWh rates, the Company should maintain a declining block structure and
13 translate the flat price obtained through bids into separate prices for each block.

14
15 Q. Several parties contend that PPL Electric's filing, and particularly its proposed
16 laddering for the Residential and Small Commercial and Industrial Classes is
17 premature and should await issuance of final POLR regulations by the
18 Commission. Do you agree with this assessment?

19 A. No, I do not. First, completely apart from the Commission's regulations, I believe
20 it is absolutely essential that PPL Electric start now to acquire power to serve its
21 smaller POLR customers. Our laddering approach was developed in direct
22 response to the failures experienced in other POLR solicitations, such as Pike
23 County, where customers experienced generation rate increases of over 100%

1 because of poor timing of POLR solicitations. It should be obvious that an EDC
2 should not put all of its eggs in one basket through a single POLR solicitation that
3 is subject to weather and the vagaries of the energy markets. This is particularly
4 true for our smaller customers who do not have the size, sophistication or interest
5 to protect themselves though forward purchasing and other hedging
6 mechanisms. I do not believe that a single solicitation for smaller customers is
7 sound public policy at this time for a one-year bridge program for a single utility.
8

9 Moreover, the fact that the PUC may issue final POLR regulations at some point
10 in the future should not change this analysis. First, the PUC has been
11 developing POLR regulations for a number of years, but has yet to issue final
12 regulations. Second, any regulations that are issued must undergo review by the
13 Independent Regulatory Review Commission and may take many more months
14 to finalize. Waiting for final regulations could significantly shorten the laddering
15 period and needlessly expose PPL Electric's smaller customers to price volatility.
16 Third, PPL Electric has specifically anticipated the issuance of final regulations
17 and has committed in the CBP to comply prospectively with these regulations, if
18 and when they are issued, and if they are applicable to PPL Electric for 2010.
19

20 In addition, the absence of regulations has already created uncertainty in the
21 financial and capital markets. Financial analysts have noted the absence of
22 POLR policy as an uncertainty and have raised a number of questions regarding
23 the status of POLR regulation in Pennsylvania. PPL Electric understands the

1 complexities surrounding these POLR issues and is not criticizing the PUC for
2 the timing of the regulations. However, it is very important to the Company and
3 its customers to have a plan in place while awaiting final regulations. The CBP
4 accomplishes this goal and preserves the ability to comply with regulations when
5 issued.

6
7 Q. Dominion Retail's witness Mr. Butler asserts, at page 3 of his testimony, that PPL
8 Electric has asked that it be granted waivers to allow it to acquire supply
9 according to the CBP even if the Commission were to come out with regulations
10 that were contrary to the CBP solicitation approach. Do you have any
11 comments?

12 A. Yes. Mr. Butler apparently misunderstands PPL Electric's request for waiver.
13 PPL Electric has requested waivers from any new Commission POLR regulations
14 only to the extent solicitations have been undertaken prior to the effective date of
15 such regulations. For example, if the CBP were approved, and solicitations were
16 undertaken in 2007 and 2008, the contracts with wholesale suppliers pursuant to
17 those solicitations, and the resulting portion of the POLR prices resulting from
18 those contracts, would not be voided by new POLR regulations that
19 hypothetically become effective on January 1, 2009. However, PPL Electric
20 would, to the extent possible, obtain the remaining one-third of its POLR
21 requirement pursuant to such new POLR regulations. This limited waiver is
22 necessary to provide potential wholesale bidders with the assurance that their
23 contracts will be honored. Otherwise, PPL Electric would have to include a

1 "regulatory out" provision in the POLR SMA, which likely would discourage any
2 wholesale suppliers from bidding.

3
4 Q. How do you respond to the recommendation that pricing for Residential and
5 Small Commercial and Industrial customers should employ a "monthly market
6 pricing model"?

7 A. Mr. Lacey describes a process (page 7 line 7) by which the Company would
8 conduct a series of auctions for supply for one month periods. Auctions would be
9 held 60 days in advance of the delivery month and contracts would be completed
10 with successful bidders not later than 45 days from the start of supply. Mr. Lacey
11 states that the 45-day window allows customers sufficient time to evaluate
12 competitive offers in light of the future month's price. However, the Company
13 sees several problems with this approach. First, it exposes customers in the
14 Residential and Small Commercial and Industrial Classes to price volatility that
15 they would not otherwise face. Second, the mechanics of fitting monthly price
16 changes to 20 different billing cycles that span months will create huge consumer
17 education challenges and, potentially, tremendous customer confusion. Finally,
18 PPL Electric's costs to administer such a rate structure would be considerably
19 greater when compared to the proposed CBP.

20
21 Q. Please describe the price volatility that customers in these classes will
22 experience.

1 A. Initially I would note that Mr. Lacey's recommendation and his observations on
2 volatility under the CBP appear to be based, at least in part, on a
3 misunderstanding of the Company's CBP proposal. Mr. Lacey states (page 4
4 line 21) that under PPL Electric's proposal, customers will be exposed to monthly
5 price volatility as a function of changes in usage from month to month and the
6 application of the declining block structure in PPL Electric's tariff. However, the
7 Company's proposal is to replace its existing block pricing for generation with a
8 flat cent per kWh charge. As a consequence, under the CBP, PPL Electric
9 customers would see the same price per kWh for generation regardless of the
10 amount of electricity they consume. Any remaining block structure pricing that
11 customers experience will be related to the Company's distribution rates, which
12 are not a subject of these proceedings.

13
14 Under Mr. Lacey's proposal customers will experience a new price each month.
15 While the Company knows of no historical data regarding the prices paid for
16 monthly full requirements load following supply bid 60 days in advance of
17 delivery, Exhibit DAK 3 tabulates historical monthly average Locational Marginal
18 Prices (LMPs) for the years 2002 through 2005 as a way to assess the degree of
19 volatility to which customers might be exposed. While LMP represents only a
20 part of the cost of supply and of customers' bills, the following insights can be
21 drawn:

- 22 - Because LMPs change every month, it can be expected that
23 customers will see changes in price every month.

- 1 - Month to month increases can be as much as 2.2 cents per kWh and
- 2 decreases can be as much as 2.0 cents per kWh.
- 3 - Month to month increases can be as much as 52% and decreases can
- 4 be as much as 32%.
- 5 - The difference within a calendar year can be as much as 4.4 cents per
- 6 kWh and 200%.

7 Clearly, customers will experience very substantial price volatility under Mr.
8 Lacey's proposal that they would not experience under the Company's CBP. I
9 want to make clear also that the Company is not advocating that customers
10 never be exposed to price volatility. In fact, the demand side programs that the
11 Company proposes as part of the CBP will expose customers to price volatility.
12 The Company does advocate, however, that, because the CBP represents a
13 bridge from capped prices, the pricing during that period, while derived from the
14 market and reflective of the market, should not expose all customers to more
15 extreme market volatility.

16
17 Q. Please describe the mechanical problems associated with implementing Mr.
18 Lacey's proposal.

19 A. Mr. Lacey's proposal would seek monthly supply contracts, but customers are
20 actually billed in 20 billing groups spread through each month in order to levelize
21 meter reading and billing activities and to levelize revenue collections. As a
22 consequence, every customer, except for fewer than 500 who are billed a
23 calendar month basis, will be billed on a price that reflects a pro rating of two

1 successive months. Mr. Lacey describes a customer having 45 days to consider
2 competitive alternatives, but, in reality, that customer may never actually know
3 the price for the second part of the billing period by the time he must commit to a
4 competitive alternative. Furthermore, even if the customer were to have the
5 POLR price for the entire billing period, that would only be a one month price so
6 the customer would either be faced with shopping month to month (if monthly
7 competitive offers are actually available) or guessing as to the price of future
8 POLR months. The Company believes that Mr. Lacey's proposal would actually
9 make it more difficult for customers to make educated shopping decisions.
10 Under his proposal, it is conceivable that customers may shop only because they
11 will take the first fixed price offer and not because it is in their best economic
12 interest.

13
14 An additional serious problem associated with Mr. Lacey's proposal is that it
15 would be totally impractical to offer customers budget billing – a program that
16 many small customers rely on to help them manage their spending. Without
17 knowledge of forward prices, the calculation of a monthly budget amount for
18 customers would be pure guesswork with the result that the annual budget
19 reconciliation would become extremely volatile and, ultimately, defeat the
20 purpose of having a budget. Approximately 155,000 customers (14% of all
21 residential customers) participate in the budget billing program.

22

1 Q. At pages 11-12 of his testimony, Mr. Ajello criticizes PPL Electric's laddered
2 solicitation process for small customers as not being able to "guarantee" a
3 particular level of price increases. Please comment.

4 A. PPL Electric never suggested that its laddered solicitation would guarantee any
5 particular price, or that it would control increases to a range of 20%-30%. PPL
6 Electric's goal was, and is, to avoid having POLR prices set at a time of abnormal
7 market prices, as appears to have occurred for Pike County Light & Power
8 Company. PPL Electric does believe that a series of laddered solicitations for
9 the Year 2010 will provide the market's assessment of the expected cost of
10 POLR supply, without undue bias caused by unusual events.

11
12 Q. Please respond to Dominion Retail witness Butler's proposal that PPL Electric
13 solicit all of its requirements in 2009 and fix prices for three to five years.

14 A. There are various aspects of this proposal that are unacceptable to PPL Electric.

15
16 First, fixing a price for three to five years is completely contrary to PPL Electric's
17 goal of a one-year "bridge" to full statewide competition. PPL Electric is not
18 seeking to preempt the Commission's ultimate adoption of POLR regulations by
19 establishing POLR rates going out to 2012 or 2014.

20
21 Second, having PPL Electric solicit all of its requirements for this 3 to 5 year
22 period over a limited number of solicitations in one year continues to present the
23 problem that resulting POLR rates could be affected by unusual market forces.

1 This concern about the effect of a short-term price spike, which was a primary
2 reason for PPL Electric's proposal for six solicitations over a period of three
3 years, would be magnified if the resulting rate is then fixed for 3 or more years.
4 In that regard, I question why a single-year acquisition for a 3 to 5 year fixed
5 POLR rate is more reasonable than a three-year solicitation process for a one-
6 year fixed rate.

7
8 I also am concerned about the premium that would be built into any bids for a 3
9 to 5 year fixed POLR product. PPL Electric's proposal to have wholesale
10 suppliers provide "tranches," or a fixed percentage of customer requirements,
11 places upon wholesale suppliers all load risk, including all shopping risk. None of
12 the EGSs appear to disagree with this approach. However, the risk associated
13 with customers leaving POLR service in 2010 may be perceived as much less
14 than the risk of customers leaving and returning over a 3 to 5 year period.
15 Similarly, a supplier bidding on a one-year fixed POLR rate is assessing the risk
16 of changes in the number of customers and their usage for a one-year time span,
17 whereas the supplier would have to factor in the expected load shape and growth
18 occurring over the 3 to 5 year fixed-price period. All things being equal,
19 increased risk would translate into increased premiums in the bids, thereby
20 driving up the POLR rates.

21
22 Q. Please respond to OCA's proposal with respect to Rate Schedule RTS.

1 A. OCA recommends that the absolute difference in 2006 average rates between
2 Rate Schedule RS and Rate Schedule RTS be maintained. Dr. Estomin
3 calculates this absolute difference to be \$0.0301 per kWh (page 13, table 2 at
4 line 11). The effect of this proposal would be to charge Rate Schedule RS
5 customers slightly more than the average residential customer class rate
6 developed under the CPB, and to charge Rate Schedule RTS customers
7 somewhat less than the average residential customer class rate.

8
9 PPL Electric would agree to modify its CBP to adopt the concept proposed, with
10 certain modifications described below, provided that its reconciliation proposal is
11 adopted. As explained by Mr. Kleha, and as acknowledged by Dr. Estomin (page
12 18), if the Rate Schedule RS and Rate Schedule RTS rates differ from the
13 average residential class rate under the CBP, there is increased risk that
14 revenues and costs under the CBP will diverge.

15
16 Q. What modifications does the Company propose to Dr. Estomin's proposal?

17 A. The Company believes two modifications are necessary. First, it appears that
18 Dr. Estomin's calculation is done on a total bill basis; i.e., the differentials
19 between Rate Schedules RS and RTS include not just the contribution of
20 differences in the design of generation rates, but, also, differences in the design
21 of distribution rates. Distribution rates are not at issue in this proceeding and it is
22 inappropriate to undertake a POLR design that, in effect, addresses distribution
23 issues. Accordingly, the Company's first modification to OCA's proposal is to

1 calculate the differential effect on the Energy and Capacity and Stranded Cost
2 components of the rate schedules only. Second, Dr. Estomin's proposal would
3 hold the differential that exists in 2006 while the Company believes that, because
4 the increase at issue is the one customers will see from 2009 to 2010, the more
5 appropriate differential to focus on is the one that will exist between Rate
6 Schedule RS and Rate Schedule RTS generation charges in 2009. Because the
7 Company's tariff specifies Energy and Capacity and Stranded Cost charges in
8 each year through 2009, it is possible to perform this calculation. From a
9 conceptual perspective, while the Company's Commission-approved
10 restructuring settlement includes a design for stranded recovery and energy and
11 capacity that intends the sum of the two be constant through the 2006 through
12 2009 period, the 2006 tariff figures used by Dr. Estomin include the effect of the
13 annual reconciliation of the Competitive Transition Charge and Intangible
14 Transition Charge. The Company believes that the differential that is set for
15 2010 should not reflect the reconciliation of stranded collections in the 2005-2006
16 period and, therefore, would also modify OCA's proposal to reflect 2009 charges
17 as published in the Company's tariff.

18
19 Q. How would the Company's modifications affect OCA's proposal?

20 A. The Company accepts the average use by RS and RTS customers that OCA has
21 used in the calculation. Applying their billing determinates to 2009 charges for
22 Energy and Capacity and Competitive Transition Charge (Intangible Transition
23 Charge is forecast to be zero cents per kWh in 2009), the Company calculates a

1 differential of 1.35 cents per kWh and is willing, subject to Commission approval
2 of its reconciliation proposal, to design 2010 POLR rates for Rate Schedule RTS
3 to be 1.35 cents per kWh lower than those for Rate Schedule RS. The
4 calculation of this differential is presented in Exhibit DAK 3. As recognized by Dr.
5 Estomin, retaining the differential will require that the average RS generation rate
6 be slightly higher than the average generation rate for the residential class as a
7 whole.
8

9 Q. Do you agree with Dr. Estomin's proposal that the generation rates for Rate
10 Schedules RS and RTD should be moved to equality?

11 A. Yes. This is consistent with PPL Electric's original proposal in this proceeding.
12

13 Q. Please respond to Dr. Estomin's proposal that the generation rates for Rate
14 Schedules RS and RTD under the CPB should continue to reflect blocked rates.

15 A. PPL Electric does not agree with this proposal. As shown in the first table on
16 page 16 of Dr. Estomin's testimony, Dr. Estomin's own calculations demonstrate
17 that if current 2006 declining block rates for energy and capacity plus transition
18 charges were converted to block rates, the resulting effects upon total monthly
19 bills would be very minor. Furthermore, as demonstrated by comparing the
20 results shown on the second table on page 16 to the results shown in the table
21 on page 17, Dr. Estomin's proposal to move block rates half of the way to flat
22 rates produces less than a 2% difference from estimated flat rates in 2010. In my
23 opinion, this small differential does not justify adoption of Dr. Estomin's proposal

1 to retain block generation rates for Rate Schedules RS and RTD and undertake
2 the rate translation and additional reconciliation that would be required.

3
4 Q. Finally, have you reviewed Mr. Ajello's testimony regarding several opinion
5 surveys that appear to show that both residential customers and business
6 customers favor competition in the electric utility industry?

7 A. Yes and I would like to make two points in response to this testimony. First,
8 those surveys are not really relevant to the current case. To assert that
9 customers favor competition does not answer, or even address, fundamental
10 questions such as the most appropriate method for obtaining POLR supply or the
11 proper pricing mechanism for POLR service. It will not assist the Commission in
12 determining whether the Company's CBP is a reasonable proposal for obtaining
13 POLR supply for 2010 as a bridge to state-wide market pricing for POLR service
14 in 2011. Second, both of the surveys cited by Mr. Ajello, and set forth in Reliant
15 Exhibit JAA-2, contain serious flaws that detract from their credibility and
16 usefulness.

17
18 Q. What concerns do you have with the survey that was conducted by Triad
19 Strategies for Strategic Energy?

20 A. I have three concerns with that survey. First, it is biased because the poll
21 reached only those residents of Pennsylvania who stated that they were "likely"
22 to vote in the November 2006 election. Non-voters were excluded from the
23 survey and, therefore, the results do not reflect the opinions of a significant

1 segment of the electricity consumers in the Commonwealth. Second, the survey
2 is biased because several of the questions are prefaced by a statement that
3 strongly suggests competition will provide significant benefits to consumers. The
4 two questions quoted on page 4 of that survey in Reliant Exhibit JAA-2 are good
5 examples. Such a preface may unfairly influence respondents to indicate
6 support for competition, whereas a more neutral preface would not influence their
7 responses. Third, the survey does not support a conclusion that consumers
8 favor competition as strongly as Mr. Ajello appears to suggest. In fact, as shown
9 on page 4 of that survey in Reliant Exhibit JAA-2, only two respondents out of a
10 total of 700 identified gas/energy prices as "the single most important problem
11 facing Pennsylvania today." Based on that response, gas/energy prices ranked
12 next to last out of the seventeen issues identified in the survey. Even then, that
13 modest ranking could be inflated if one of the two respondents choosing the
14 issue thought it included gasoline prices.

15
16 Q. What concerns do you have with the survey that was conducted by Voter
17 Consumer Research?

18 A. I have two concerns with that survey. First, its results are not very useful or
19 reliable because the sample size was much too small. As indicated on page 12
20 of that survey in Reliant Exhibit JAA-2, only 150 residential "electricity decision
21 makers" completed the survey and those 150 decision makers were spread
22 across the service territories of PPL Electric, Duquesne Light Company and
23 Philadelphia Electric Company which, together, comprise a total population of

1 about 3.5 million residential customers. In response to Question No.8 of PPL
2 Electric's Interrogatories, Set II, Reliant indicated that, of the 150 respondents,
3 only 54 consumers were located in PPL Electric's service territory. By contrast,
4 in conducting its customer satisfaction survey every quarter, PPL Electric surveys
5 600 residential customers out of a total residential customer base of
6 approximately 1.3 million. Second, the survey produces unreliable results
7 because two responses are combined into a single score. For example, on page
8 7 of that survey in Reliant Exhibit JAA-2, the percentage of customers indicating
9 that electricity deregulation has produced "better" reliability and service is
10 combined with the percentage of customers indicating the "same" reliability and
11 service. The results of this question and the implications that can be drawn from
12 that result will vary widely depending on whether the "same" response constitutes
13 a minor or a major portion of the blended score.

14
15 Q. What is your overall reaction to these surveys and their findings?

16 A. PPL Electric has been, and remains, a staunch supporter of competition in the
17 electric utility industry. From that perspective, I do not have any quarrel with the
18 surveys cited by Mr. Ajello. However, I do not believe that they are relevant to
19 the resolution of this case, and I believe they are fundamentally flawed. I do not
20 believe that the Commission should rely on them in reaching its decision in this
21 proceeding.

1 **Consumer Education Program**

2 Q. A number of witnesses have commented on PPL Electric's proposed consumer
3 education program. Could you briefly summarize the concerns that have been
4 raised?

5 A. Yes. SEF witness Dr. D'Agostino states (page 4 line 19) his belief that the
6 Company's program is not comprehensive and that the proposed funding is not
7 sufficient to carry out a truly comprehensive program. Dr. D'Agostino offers
8 (page 6 line13) SEF's experience and assistance in further defining a consumer
9 education program and (page 15 line 6) proposes Commission oversight of the
10 program.

11
12 OCA witness Dr. Estomin (page 23 line 13) asserts that PPL Electric's proposed
13 allocation of dollars associated with consumer education is too heavily weighted
14 toward 2007 and 2008 and should be designed, instead, to spend greater
15 amounts in 2009. Dr. Estomin also (page 23 line 21) offers the opinion that PPL
16 Electric's proposal for consumer education is not sufficiently defined and that the
17 Company should be directed to work with other parties to develop program
18 details.

19
20 Q. How do you respond to the concern raised by SEF that PPL Electric's proposed
21 consumer education program is not comprehensive?

22 A. As stated in my direct testimony (Statement No. 1, page 23 line 11), the
23 Company's proposed program is not intended to address broad statewide

1 consumer education needs. It is intended only to address the needs associated
2 with the CBP. What Dr. D'Agostino describes as a comprehensive plan may
3 indeed be appropriate as a separately funded statewide consumer education
4 effort coupled with a statewide plan for the long-term provision of POLR.
5 However, it is clearly not appropriate for a one-year bridge that may or may not
6 be consistent with the final structure of POLR regulations. PPL Electric's
7 *proposed program is consistent with the needs created by the CBP and should*
8 *be approved on that basis.*

9
10 Q. How do you address the concerns raised by both SEF and OCA that the
11 Company's proposal needs to be better defined?

12 A. PPL Electric agrees that parts of its proposal need to be better defined. Other
13 parts of it are, however, quite well defined. Statement No. 1 describes (page 21
14 line 22) four areas that would be the focus of the proposed consumer education
15 program. In the area of existing customer choice education, for example, the
16 Company is required, in accordance with Commission rules, to issue the "Price to
17 Compare" to its customers in May and October of each year. The Company has
18 been carrying out this obligation by maintaining the required information on its
19 website and including an insert with the required information in its May and
20 October cycles of bills. The Company would expect to continue this activity in
21 the same fashion through 2009, that it would be relatively unaffected by the CBP,
22 and that, accordingly, no further definition is required.

1 POLR rate education and demand-side response education will need to reflect
2 the final form of the CBP and some additional definition will undoubtedly be
3 required. However, other aspects, such as the direct mail pieces the Company
4 has developed to make eligible customers aware of the residential demand
5 response program and to solicit their participation, already exist and have been
6 used within the Commission's DSR Working Group as a model for this type of
7 education.

8
9 It is the Company's intent that efforts in the fourth area, education on the wise
10 use of energy, be built on the platform provided in the meter data management
11 system that the Company is in the process of installing. This product provides a
12 customer interface that permits residential customers to analyze their electricity
13 use, analyze the energy use of appliances or home improvements they may
14 consider buying, and to analyze impacts on their electric bills. While further
15 definition of the program is required, that definition must be consistent with the
16 interface being installed and its capabilities.

17
18 Q. How does the Company propose to accomplish this further definition?

19 A. The Company would welcome the participation of the other parties and
20 Commission staff, as we have in past consumer education efforts, to help define
21 program objectives and efforts. The Company concurs with the suggestions of
22 SEF and OCA in this regard. Accordingly, if the Commission approves the CBP,

1 the Company will facilitate a collaborative process to develop a more detailed
2 design of the consumer education program within the \$875,000 budget.

3
4 Q. How do you respond to the concern raised by OCA that the Company's proposed
5 funding of the consumer education program is too heavily weighted toward 2007
6 and 2008 and should be designed, instead, to spend greater amounts in 2009?

7 A. The cash flow presented in Statement No. 1 (page 21 line 21) is consistent with
8 OCA's view; i.e., it is more heavily weighted toward 2009. This was done,
9 consistent with OCA's logic, to increase education efforts closer to the time when
10 customers will be using that education. The real difference between the OCA's
11 view and the Company's proposal is, therefore, one of degree. Given that both
12 the Company and OCA agree the education programs need to be further defined
13 in certain areas, it would also seem reasonable to expect the cashflows to be
14 adjusted as the programs are further defined. Accordingly, PPL Electric is willing
15 to address cash flows as a part of the collaborative process I discussed
16 previously. The Company does note, however, that there are four considerations
17 that caused it to include more funding in 2007 and 2008 than the OCA might
18 otherwise recommend. These are as follows:

- 19 1. The base level of spending to continue to carry out required customer
20 choice education is \$100,000 per year in 2007, 2008, and 2009.
- 21 2. The customer interface to the meter data management system that was
22 described above is expected to be available during 2007 and presents an
23 opportunity to educate customers in this timeframe.

1 3. If customers are going to undertake energy efficiency or conservation
2 measures prior to 2010, they will need to be educated on their options
3 sufficiently prior to that date to allow them time to implement those
4 measures and potentially take advantage of tax credits available under
5 the federal Energy Policy Act of 2005 which are scheduled to expire
6 (unless extended by Congress) at the end of 2007.

7 4. Consistent with the original CBP proposal that customers in the Large
8 Commercial and Industrial class would need to decide to elect fixed-price
9 service in late 2008, funds were included in 2008 to provide educational
10 materials to assist them in making that decision.

11
12 Q. How do you respond to the concern of SEF that the proposed spending of
13 \$875,000 is a reflection of the funds available and not of the funding needed?

14 A. The Company agrees that the \$875,000 amount is the amount that remains in its
15 current customer choice education account. The total amount set aside for
16 consumer education pursuant to the Company's Commission-approved
17 restructuring settlement was almost \$22 million. PPL Electric believes that the
18 education programs it has identified arise from customer choice and, therefore,
19 spending these remaining funds on the proposed programs is consistent with the
20 purpose for which the funds were set aside. PPL Electric believes that educating
21 consumers regarding POLR supply and energy use are appropriate functions of
22 a distribution company for two fundamental reasons:

1 1. POLR supply and actions a customer may take to use energy wisely are
2 available to all customers whether they shop or not.

3 2. The costs of such programs should be recovered through a non-
4 bypassable mechanism to assure that the program provider is
5 compensated and that all customers contribute appropriately for the
6 service they are provided.

7 Limiting the program to the amount of funds available has the advantage of not
8 requiring the creation of a collection mechanism or any new collections from
9 customers. In this regard, I emphasize that PPL Electric will not agree to any
10 further expansion of the education program without further funding.

11
12 The remaining issue is whether \$875,000 represents enough funding to carry out
13 on-going customer choice education plus new initiatives related to
14 implementation of the CBP; keeping in mind that the CBP will only be in place for
15 a single year and may not reflect the long-term characteristics of POLR
16 regulations. The Company continues to believe that \$875,000 is sufficient for the
17 purpose of educating consumers regarding issues they may face arising from the
18 CBP. The Company does agree with other parties that a more comprehensive
19 consumer education program will be needed to educate consumers consistent
20 with the Commission's final rules on POLR supply. Part of the Company's
21 rationale for advocating a standard statewide POLR process is that such a
22 process can be more effectively communicated to customers using statewide
23 media than processes that are unique to individual service territories. Such a

1 consumer education program should, logically, be part of the implementation of a
2 statewide process and not part of a one-year effort.

3
4 Q. On page 16 of his testimony, SEF witness Dr. D'Agostino proposes to have PPL
5 Electric adopt a home energy audit program. How do you respond to this
6 proposal?

7 A. The customer interface to the meter data management system that I described
8 previously includes a rather sophisticated, web-based, interactive home energy
9 audit that the Company believes will be very useful in helping customers to
10 understand their energy usage and to explore opportunities they have to use
11 energy more wisely and reduce their electricity bills. Because this tool is
12 interactive and web-based, the Company believes that it will be able to provide
13 significant education to customers about the tool and its use within the \$875,000
14 budget proposed.

15
16 **Demand-Side Response Programs**

17 Q. A number of witnesses have commented on PPL Electric's proposed demand
18 side response programs. Could you briefly summarize the concerns that have
19 been raised?

20 A. Yes. PennFuture witness Dr. Tuffey states (pages 4 and 5) that the Company
21 should institute a program to identify and provide notice to customers
22 representing the top 10% of peak load in each customer class. Dr. Tuffey
23 proposes that the Company provide those customers with voluntary strategies to

1 reduce or shift load and provide the same customers with information the day
2 after at least two "critical events" and recommend strategies that would reduce
3 cost for the next peak event. Dr. Tuffey also proposes that the Company submit
4 to the Commission by December 31, 2009 for implementation during 2010, a
5 "real time DSR program that would be structured to enroll customers
6 representing 10% of the peak load in each customer class." Finally, Dr. Tuffey
7 proposes that PPL Electric implement two sets of energy efficiency programs.
8 The first would be designed to achieve a 1% reduction in kWh consumed by
9 customers in 2010. The second, to be submitted to the Commission by
10 December 31, 2009 for implementation in 2010, is described as a "real time
11 Energy Efficiency and Conservation program that would be structured to annually
12 reduce (kWh) consumed by the equivalent of the projected annual load growth."

13
14 FES witness Ms. Prelezj states (page 10 line 14) that PPL Electric should not be
15 permitted to extend or expand its DSR programs, in particular as those programs
16 relate to customers in the Large Commercial and Industrial Customer Class.

17
18 Q. How do you respond to Dr. Tuffey's proposals?

19 A. Dr. Tuffey's proposals regarding notifying customers representing the top 10% of
20 peak load in each customer class and providing those customers with voluntary
21 strategies to reduce or shift load, both as a general matter and following "critical
22 events," would seem to be matters relating to the education of consumers. Dr.
23 Tuffey's proposals regarding the establishment of a real time DSR program for

1 the same group of customers and the establishment of energy efficiency and
2 conservation programs seem to be matters relating to the creation of incentive
3 programs rather than simply education.
4

5 As stated earlier, the Company is willing to facilitate a collaborative process to
6 develop a more detailed design of the consumer education program within the
7 \$875,000 budget and the notification of customers that they are among the
8 Company's largest contributors to peak load could be a part of that program.
9 The total number of customers who would have to be notified would be about
10 100,000 customers. The Company currently has no mechanism to reach these
11 customers individually other than by direct mail. For example, the Company has
12 no capability to print a special bill message to only those customers or to insert a
13 paper notice in the course of billing for only this group. The Company typically
14 estimates the cost of this type of mailing at about \$1.00 per piece. The Company
15 believes that it would be appropriate for the collaborative to consider whether this
16 would be a wise use of available funds. The Company does not believe,
17 however, that notification of the same group of customers with similar information
18 the day after "critical events" is practical or desirable. Notification would, as
19 described previously, need to be by direct mail so it could not be in the
20 customers' hands within 24 hours. Finally, each notification would cost about
21 \$100,000.
22

1 With regard to the establishment of a real time DSR program for customers
2 representing the top 10% of peak load in each customer class, the Company
3 believes that its two proposed DSR programs already meet this need. The
4 Company's proposed programs will be available to all customers in the
5 Residential and Large Commercial and Industrial Classes and, although not
6 based on real time hourly prices, these programs do have pricing that varies with
7 time and, thereby, provides participants an incentive to shift load to lower cost
8 hours. The Company does not believe that it is appropriate to establish
9 extensive new energy efficiency and conservation programs in the context of a
10 simple one-year bridge plan for POLR supply. If targeted to achieve the
11 reductions proposed by Dr. Tuffey, such programs will have a significant effect
12 on the Company's recovery of distribution revenue and should only be
13 considered in the context of a distribution rate proceeding or, in the alternative, in
14 the context of the efforts of the Commission's Demand Response Working Group
15 to consider and, if appropriate, recommend to the Commission the
16 implementation of revenue recovery mechanisms that "decouple" revenue
17 collection from usage.

18
19 Q. How do you respond to FES' recommendation that the Company not be
20 permitted to extend or expand its DSR programs?

21 A. As stated in Statement No. 1 (page 20 line 14), the Company agrees in principle
22 with FES' view that it might be more appropriate for electric generation suppliers,
23 rather than the POLR, to be providing DSR programs to customers. However,

1 the Company believes that, because there are very few suppliers offering service
2 to customers in the Company's service territory, it is appropriate for it to offer a
3 limited number of such programs, at least during a bridge period. In addition,
4 being able to offer a few modest DSR programs enhances the ability of the
5 Company to educate its customers on the wise use of energy and the nature of
6 market pricing. In that way customers will be better prepared to take advantage
7 of such programs when they are offered in the competitive retail market.
8

9 Q. A number of witnesses have suggested that, in addition to its own demand-side
10 programs and programs that other parties have proposed, the Company should
11 also conduct a Request for Proposal (RFP) solicitation for conservation and
12 demand-side programs as part of its solicitation for supply. Could you briefly
13 summarize the concerns that have been raised?

14 A. Yes. Both Dr. Tuffey (on behalf of PennFuture) and Dr. Estomin (on behalf of
15 OCA) recommend that, as part of its solicitation for supply, PPL Electric be
16 directed to issue an RFP for bids to provide DSR or energy efficiency programs
17 for a specified percentage of its capacity and energy needs.
18

19 Q. How do you respond to these concerns?

20 A. The Company intends for the CBP to be a simple one-year bridge and believes
21 that the inclusion of demand-side programs within the solicitation process
22 significantly complicates the process with little or no likely benefit for customers.
23 The inclusion of such solicitations introduces uncertainty for those bidding supply

1 because prospective suppliers will not know how load shapes may be affected by
2 the demand-side solicitations. As a result, the prospective suppliers are likely to
3 bid prices that are higher than they might otherwise be. Also, the inclusion of
4 such programs and the need to sign up customers to participate will create a
5 significant consumer education need that it is not factored into the Company's
6 consumer education proposal. Finally, because most demand side investments
7 require several years to recover sufficient benefits to offset costs, the Company
8 questions the practicality of soliciting customer participation for a one-year period
9 or, alternatively, the willingness of aggregators to sign customers to a program of
10 *longer than one year when they are only guaranteed a revenue stream for a*
11 *single year.* The Company believes that the demand side programs it has
12 proposed in the CBP are sufficient to satisfy the demand of customers for such
13 programs in the context of a one-year bridge to an as-yet undefined POLR end
14 state. The Company believes that solicitation programs such as those proposed
15 by Dr. Tuffey and Dr. Estomin have a greater chance of success if undertaken in
16 the broader context of a statewide POLR process and, in fact, after that process
17 has had an opportunity to mature.

18 19 **AEPS Resources**

20 Q. Dr. Tuffey (on behalf of PennFuture) recommends (page 9) that the Company be
21 directed to include in its 2007 solicitations for supply its full 2010 requirement for
22 Tier I resources, including solar, under the AEPS Act instead of simply requiring

1 bidders to assure that their bid includes the appropriate percentage of each type
2 of resource required by the Act. Do you agree with this recommendation?

3 A. No, I do not as it relates to all Tier I resources. Dr. Tuffey's rationale is that this
4 sort of front-end loading is necessary to provide Tier I resources that do not
5 currently exist time to finance and construct facilities prior to 2010. The
6 Company believes that, as structured, the Act intends that compliance
7 obligations be met in a market environment that promotes fair competition among
8 all types and vintages of Tier I resources in order to achieve the environmental
9 objectives of the Act at the lowest cost to customers. Dr. Tuffey's proposal would
10 limit those market dynamics to the year 2007 and preclude cost effective
11 opportunities that might otherwise come along in 2008 or 2009 and be available
12 to reduce the cost impact on PPL Electric's customers. The Company also
13 questions whether a one-year commitment with a supplier for generation to serve
14 PPL Electric's POLR load would actually provide a revenue stream significant
15 enough to aid in the financing and construction of projects in any meaningful
16 way. It is the Company's experience that developers are typically looking for
17 several years of committed revenues and, as a one-year bridge, the CBP does
18 not offer an opportunity for multi-year revenue commitments.

19
20 Q. Is any portion of Dr. Tuffey's proposal acceptable to the Company?

21 A. Yes. The Company is willing to adopt Dr. Tuffey's proposal with respect to solar
22 photovoltaic resources. The Act treats solar photovoltaic resources differently
23 from Tier I or Tier II resources in a number of ways, and the Company, therefore,

1 is willing to re-design its 2007 supply procurements for customers in the
2 Residential and Small Commercial and Industrial classes to include percentages
3 of solar photovoltaic resources that will be sufficient to meet the Company's
4 entire 2010 compliance obligation for those classes. Consequently, its 2008 and
5 2009 procurements for those classes will include no solar photovoltaic resources.
6 Solar photovoltaic resources associated with customers in the Large Commercial
7 and Industrial class will be procured in 2009.

8

9 Q. Does this conclude your rebuttal testimony?

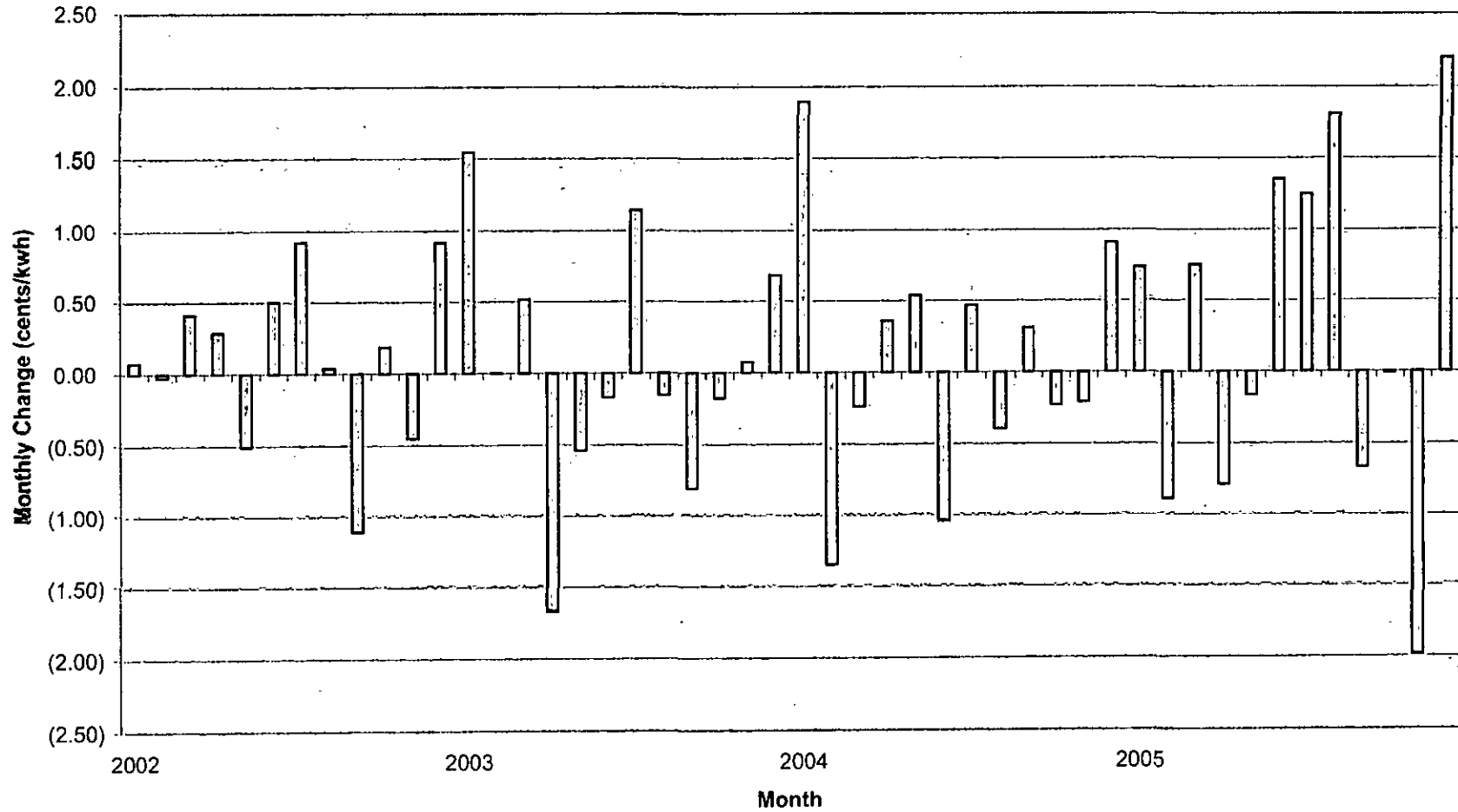
10 A. Yes, it does.

PPL Electric Utilities
Analysis of Monthly Average LMP at the PPL Zone

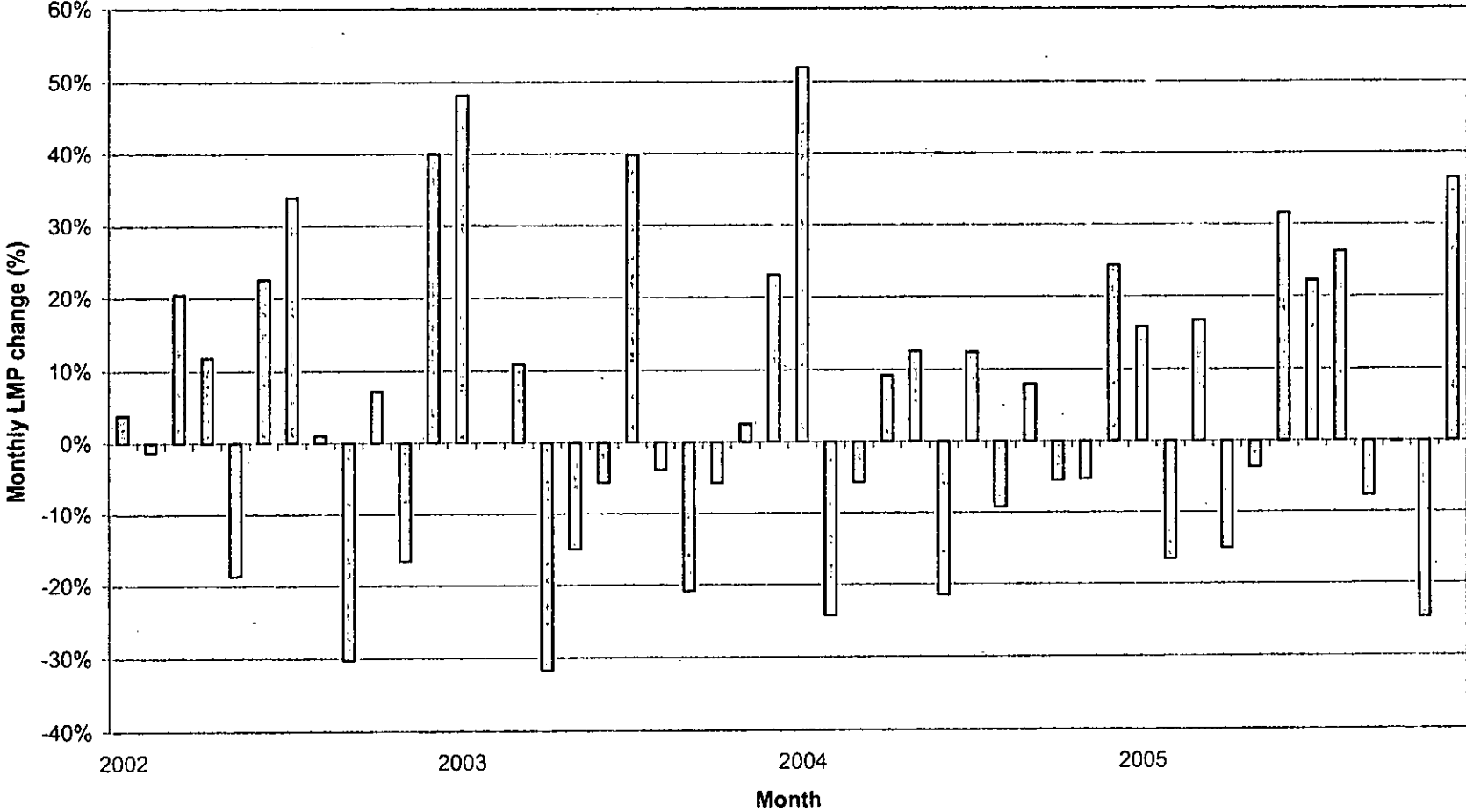
Year	Month	Average LMP PPL Zone cents/kwh	Month to month Difference cents/kwh	Month to month Change %
2001	December	1.97		
2002	January	2.05	0.08	4%
2002	February	2.02	(0.03)	-1%
2002	March	2.44	0.41	20%
2002	April	2.73	0.29	12%
2002	May	2.22	(0.51)	-19%
2002	June	2.72	0.50	23%
2002	July	3.64	0.92	34%
2002	August	3.68	0.04	1%
2002	September	2.56	(1.11)	-30%
2002	October	2.75	0.18	7%
2002	November	2.29	(0.45)	-17%
2002	December	3.21	0.92	40%
2003	January	4.75	1.54	48%
2003	February	4.75	0.00	0%
2003	March	5.27	0.52	11%
2003	April	3.60	(1.67)	-32%
2003	May	3.06	(0.54)	-15%
2003	June	2.88	(0.17)	-6%
2003	July	4.03	1.15	40%
2003	August	3.88	(0.15)	-4%
2003	September	3.07	(0.81)	-21%
2003	October	2.89	(0.18)	-6%
2003	November	2.96	0.07	2%
2003	December	3.64	0.68	23%
2004	January	5.54	1.89	52%
2004	February	4.19	(1.35)	-24%
2004	March	3.95	(0.24)	-6%
2004	April	4.31	0.36	9%
2004	May	4.85	0.54	13%
2004	June	3.80	(1.04)	-22%
2004	July	4.27	0.47	12%
2004	August	3.88	(0.40)	-9%
2004	September	4.19	0.31	8%
2004	October	3.95	(0.23)	-6%
2004	November	3.74	(0.21)	-5%
2004	December	4.65	0.91	24%
2005	January	5.39	0.73	16%
2005	February	4.49	(0.89)	-17%
2005	March	5.25	0.75	17%
2005	April	4.45	(0.79)	-15%
2005	May	4.29	(0.17)	-4%
2005	June	5.64	1.36	32%
2005	July	6.90	1.25	22%
2005	August	8.70	1.81	26%
2005	September	8.04	(0.67)	-8%
2005	October	8.02	(0.01)	0%
2005	November	6.03	(1.99)	-25%
2005	December	8.23	2.20	36%

PPL Electric Utilities
Monthly Change in LMP at the PPL Zone
For the Period 2002 through 2005

DAK 3



PPL Electric Utilities
Monthly Percent Change in LMP at the PPL Zone
For the Period 2002 through 2005



PPL Electric Utilities
Calculation of Rate Schedule RTS and Rate Schedule RS Price Differential

Average Rate Schedule RS Energy and Capacity and Competitive Transition Charges

			2009	
Energy & Capacity	kW	kWh	Rate	Total
First 200 kwh		200	\$ 0.05949	\$ 11.90
Next 600 kwh		600	\$ 0.05231	\$ 31.39
Excess kwh		200	\$ 0.04800	\$ 9.60
Total Energy & Capacity				\$ 52.88
Competitive Transition Charge				
First 200 kwh		200	\$ 0.01293	\$ 2.59
Next 600 kwh		600	\$ 0.01147	\$ 6.88
Excess kwh		200	\$ 0.01059	\$ 2.12
Total Competitive Transition Charge				\$ 11.59
Total Charges				\$ 64.47
Average Rate				\$ 0.0645

Average Rate Schedule RTS Energy and Capacity and Competitive Transition Charges

			2009	
Energy & Capacity	kW	kWh	Rate	Total
On-peak demand in excess of 2 kw	4.9		\$ 5.31	\$ 26.02
All kWh		2,349	\$ 0.03275	\$ 76.93
Total Energy & Capacity				\$ 102.95
Competitive Transition Charge				
All kWh		2,349	\$ 0.00719	\$ 16.89
Total Charges				\$ 119.84
Average Rate				\$ 0.0510

Price Differential between Rate Schedules RS and RTS **\$ 0.0135**