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May 11, 2006

VIA UPS OVERNIGHT

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

RECEIVED
MAY 11 2006
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Jack D. Lawrie v. Pennsylvania Electric Company
Docket No. C-20066245

Dear Secretary McNulty:

Enclosed please find an original and three (3) copies of the Answer and New Matter on behalf of Pennsylvania Electric Company in the above-referenced matter. These documents have also been served on the parties of record as shown in the Certificate of Service.

If you have any questions, please contact me.

Very truly yours,

RYAN, RUSSELL, OGDEN & SELTZER LLP

DOCUMENT
FOLDER

Bridgid M. Good / FLW
Bridgid M. Good, Esquire

Enclosures
AMS:flw

c: As per Certificate of Service

53

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JACK D. LAWRIE

v.

PENNSYLVANIA ELECTRIC COMPANY:

Docket No. C-20066245

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Answer and New Matter of Pennsylvania Electric Company upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by UPS Overnight, postage prepaid, addressed as follows:

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

Service by First Class Mail, postage prepaid, addressed as follows:

Jack D. Lawrie
2504 Edgewood Drive
Tyrone, Pennsylvania 16686-3218

RECEIVED

MAY 11 2006

PA PUBLIC UTILITY COMMISSION
BUREAU OF UTILITIES

Dated: May 11, 2006

Alan Michael Seltzer

Alan Michael Seltzer
Jeffrey A. Franklin
Bridgid M. Good
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Attorneys for
Pennsylvania Electric Company

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MAY 17 2006

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PUBLIC UTILITY COMMISSION
HARRISBURG, PENNSYLVANIA

JACK D. LAWRIE

v.

Docket No. C-20066245

PENNSYLVANIA ELECTRIC COMPANY:

**ANSWER AND NEW MATTER OF PENNSYLVANIA ELECTRIC COMPANY
TO THE COMPLAINT OF JACK D. LAWRIE**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, Pennsylvania Electric Company ("Penelec" or the "Company"), by and through its counsel, Alan Michael Seltzer, Jeffrey A. Franklin, Bridgid M. Good and Ryan, Russell, Ogden & Seltzer LLP, answers the above Complaint pursuant to Section 5.61 of this Commission's regulations, 52 Pa. Code § 5.61, as follows:

**DOCUMENT
FOLDER**

DOCKETED
MAY 17 2006

1. Admitted.
2. Admitted. It is admitted that the Complaint relates to Penelec and

the Complainant is a residential customer of Penelec with Account No. 100003335880.

3. Admitted. It is admitted that Penelec provides retail electric service to the Complainant's residence at 2504 Edgewood Drive, Tyrone, PA 16686-3218 ("Service Location").

4(A). Denied. It is specifically denied that "[t]here is a reliability, safety or quality problem..." with the electric service provided to the Complainant. On the contrary, the Company has provided and continues to provide the Service Location with safe and reliable electric service consistent with the Company's duly filed and

Commission-approved retail tariff, the provision of the Pennsylvania Public Utility Code and related Commission regulations and orders.

4(B). For purposes of this Answer, the several sentences of this paragraph have been restated and answered as they appear as follows:

1) We suffer from erratic service.

Denied. It is specifically denied that the Complainant suffers from "erratic service."

2) It is not unusual to have several outages a week.

Admitted in part and denied in part. It is admitted that the Complainant, like most electric utility customers, may from time to time experience momentary outages of electric service at his Service Location. Such momentary outages are often imperceptible and have no impact on the customer or the customer's home or business. It is averred that momentary outages are interruptions in electric service with durations of five (5) minutes or less. However, it is denied that the Complainant experiences several momentary interruptions of electric service every week. It is further denied that the Complainant has several sustained electric service outages every week. It is averred that sustained outages are interruptions in electric service with durations of greater than five (5) minutes. It is further averred that in the past two years, only two (2) sustained outages occurred effecting the Complainant's electric service.

3) Some may last only seconds, some may last several minutes.

Admitted. It is admitted that momentary outages of electric service may range in duration from several seconds to up to five (5) minutes. Penelec incorporates herein by reference its response to sentence 2 above.

4) This happens day or night.

Admitted in part and denied in part. It is admitted that interruptions of electric service can occur any time of the day. It is further admitted that of the two (2) sustained outages experienced by the Complainant, only one occurred at night. After reasonable investigation, Penelec is without information or knowledge sufficient to form a belief regarding what time of day any momentary interruptions may have been experienced by the Complainant and demands proof thereof, if relevant, at hearing.

5) In this electronic age, it disrupts clocks, microwaves, ovens, coffee pots and our heating/ac main thermostat.

Denied. After reasonable investigation, Penelec is without information or knowledge sufficient to form a belief regarding the truth of the averments contained in this sentence and demands proof thereof, if relevant, at hearing.

6) When I call their customer service #, I usually get an electronic message & there is no one to vocally complain to.

Admitted in part and denied in part. It is admitted that on several occasions when the Complainant has contacted the Company regarding interruptions of electric service, he has reached the Company's electronic message advising when electric service can expected to be restored. It is specifically denied that the Complainant has been unable to contact a Penelec representative to discuss his concerns regarding interruptions to his electric service. Indeed, the Company's records show several instances where the Complainant spoke with a call center representative.

5. The allegations in this paragraph constitute a prayer for relief to which no responsive pleading is required.

6. Denied. After reasonable investigation, Penelec is without information or knowledge sufficient to form a belief regarding whether or not a Protection from Abuse order has been granted in favor of this Complainant and demands proof thereof, if relevant, at hearing.

7. Admitted. It is admitted that the Complainant has contacted the Company regarding his concerns.

8. The allegations in this paragraph do not contain any factual averments to which any responsive pleading is required.

9. Not Applicable.

10. The allegations in this paragraph do not contain any factual averments to which any responsive pleading is required.

NEW MATTER

11. The Complainant began receiving electric service from the Company on February 11, 1998.

12. The Complainant is provided electric service from the Company's 34.5 kV circuit – identified as the 168-22 circuit – fed from the Birmingham Substation ("Circuit"). The Circuit is approximately 65 miles long and serves 502 residential and commercial customers.

13. In the last two years, two (2) sustained outages occurred on the Circuit affecting the Complainant's electric service. These outages were caused by weather-related conditions.

14. In March 2006, as part of the Company's routine maintenance and improvement of the Circuit, the Company installed a recloser and radio-controlled switch on the Circuit that will assist the Company in restoring electric service more quickly

during sustained electric service outages. In addition, the Company is currently installing additional fusing on the Circuit that will be used to reduce the number of customers experiencing a sustained electric outage.

15. Furthermore, in response to the number of momentary outages recorded for this Circuit, the Company conducted an infrared study of the Circuit to determine what other actions, if any, can be undertaken to reduce the current number of momentary outages experienced by the Complainant.

16. The Company's electric service to the Complainant has been and continues to be safe, reasonable, and fully consistent with all applicable statutes and regulations.

WHEREFORE, Pennsylvania Electric Company hereby requests that the Complaint of Jack D. Lawrie be dismissed with prejudice.

Respectfully submitted,

Dated: May 11, 2006



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