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File #: 140056

August 5, 2016

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation for a Permanent Waiver of 52 Pa.  
Code § 56.97(a) to Allow Customers to Establish Payment Agreements Online or  
through an Automated Interactive Voice Response System  
Docket No. P-2016-**

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Dear Secretary Chiavetta:

Enclosed for filing is the Petition of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris Wright".

Christopher T. Wright

CTW/jl  
Enclosures

cc: Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA FIRST CLASS MAIL

Bureau of Investigation &, Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

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

Office of Small Business, Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101

Date: August 5, 2016

  
\_\_\_\_\_  
Christopher T. Wright

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :  
Corporation for a Permanent Waiver of 52 :  
Pa. Code § 56.97(a) to Allow Customers to : Docket No. P-2016-\_\_\_\_\_  
Establish Payment Agreements Online or :  
through an Automated Interactive Voice :  
Response System. :

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**PETITION OF PPL ELECTRIC UTILITIES CORPORATION**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby petitions the Pennsylvania Public Utility Commission (“Commission”), pursuant to 52 Pa. Code § 5.43, and respectfully requests a permanent waiver of 52 Pa. Code § 56.97(a) to allow the Company to continue to offer Website and Interactive Voice Response (“IVR”) capabilities to provide customers with the option to make payments and establish payment agreements either online or through an automated system to avoid termination of service. The Commission previously granted temporary waivers of 52 Pa. Code § 56.97(a) for PPL Electric’s Website and IVR systems, which waivers expire on December 31, 2016. Given the success of the online and automated payment arrangements, PPL Electric herein seeks Commission approval to continue to offer these Website and IVR capabilities on a permanent basis. In support thereof, PPL Electric states as follows:

## I. INTRODUCTION

1. This Petition is filed by PPL Electric, a public utility that provides electric distribution and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

2. PPL Electric's address is Two North Ninth Street, Allentown, Pennsylvania 18101.

3. PPL Electric's attorneys are:

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PPL Electric's attorneys are authorized to receive all notices and communications regarding this Petition.

4. PPL Electric, like other regulated utilities in Pennsylvania, has provided customers with a variety of payment options, including making payments through online or automated systems, such as its Website and IVR systems.

5. On April 7, 2010, PPL Electric filed a petition at Docket No. P-2010-2168786, requesting a two-year waiver of 52 Pa. Code § 56.97(a) to allow the Company to expand its

Website and IVR capabilities to provide customers, with certain limitations, the option of using the Website and IVR to set up payments/agreements to avoid service termination.

6. On September 24, 2010, the Commission entered an Order granting PPL Electric a two-year waiver and authorizing the Company to expand its Website and IVR capabilities to offer customers the option to establish payments/agreements either online or through an automated system to avoid termination of service. *See Petition of PPL Electric Utilities Corporation for a Declaratory Order Regarding a Pilot to Expand Website and Interactive Voice Response Capabilities to Allow Customers the Option of Setting Up Payment Agreements or, in the Alternative, a Two-Year Waiver of 52 Pa. Code § 56.97(a)*, Docket No. P-2010-2168786 (Sept. 24, 2010) (“2010 Waiver Order”).

7. Given the success of the two-year waiver for the Company’s Website and IVR systems approved by the Commission, PPL Electric filed a petition on September 28, 2012, at Docket No. P-2012-2327046, requesting a permanent waiver of 52 Pa. Code § 56.97(a) to allow the Company to continue to offer customers the option to establish payments/agreements through its Website and IVR systems to avoid termination of service. However, upon agreement with the Office of Consumer Advocate (“OCA”), PPL Electric amended its request from a permanent waiver to a four-year waiver.

8. On January 24, 2013, the Commission entered an Order granting PPL Electric a four-year waiver of 52 Pa. Code § 56.97(a) for the purpose of continuing to offer customers the option to establish payments/agreements through its Website and IVR systems to avoid termination of service. *See Petition of PPL Electric Utilities Corporation for a Permanent Waiver of 52 Pa. Code § 56.97(a) to Allow Customers to Establish Payment Agreements Online*

or through an Automated Interactive Voice Response System), Docket No. P-2012-2327036 (Sept. 28, 2012) (“2012 Waiver Order”)

9. Given the continued success of the Website and IVR systems, PPL Electric herein seeks a permanent waiver of 52 Pa. Code § 56.97(a) to allow the Company to continue to offer customers the option to establish payments/agreements through its Website and IVR systems to avoid termination of service. For the reasons that follow, PPL Electric believes that its request for a permanent waiver for its Website and IVR systems is reasonable, effective, and in the public interest.

## **II. DISCUSSION**

### **A. Legal Standards**

10. Section 56.97(a) of the Commission’s Regulations provides as follows:

(a) If, after the issuance of the initial termination notice and prior to the actual termination of service, a ratepayer or occupant contacts the utility concerning a proposed termination, an authorized utility employee shall fully explain:

- (1) The reasons for the proposed termination.
- (2) All available methods for avoiding a termination, including the following:
  - (i) Tendering payment in full or otherwise eliminating the grounds for termination.
  - (ii) Entering a settlement or payment agreement.
- (3) The medical emergency procedures.

52 Pa. Code § 56.97(a).

11. The Commission’s regulation quoted above requires that “an authorized utility employee shall fully explain” a number of issues related to a potential termination of utility service. This requirement for explanation from an authorized utility employee appears to

preclude the use of automated options, such as Website or IVR, to provide the relevant information.

12. Because PPL Electric believes that the use of such automated capabilities can provide substantial benefits to the Company and its customers, it has requested and been granted two temporary waivers of Section 56.97(a). Based on the positive results of the two temporary waivers, as discussed below, PPL Electric herein requests a permanent waiver to continue to offer customers the option to establish payments/agreements through its Website and IVR systems to avoid termination in the future.

13. Section 5.43 of the Commission's Regulations permits a party to petition the Commission for a waiver of a regulation. The petition must provide the purpose and facts that constitute the grounds requiring waiver of the regulation. 52 Pa. Code § 5.43(a). Similarly, Section 56.222 of the Commission's Regulations permits a party to seek a modification from a provision of Chapter 56 of the Commission's regulations where, as here, "technological advance permits an enhanced level of customer service." 52 Pa. Code § 56.222.

14. The Commission has explained that it has the authority to waive its regulations when it is necessary and in the public interest. *Petition of Direct Energy Services, LLC for Emergency Order Approving a Retail Aggregation Bidding Program for Customers of Pike County Light & Power Company*, Docket No. P-00062205, 2006 Pa. PUC LEXIS 3, 249 P.U.R.4th 327 (April 20, 2006); *Petition of ALLTEL Pennsylvania, Inc. for Declaratory Order*, Docket Nos. P-00950955, *et al.* (June 10, 1996).

15. For the reasons explained below, PPL Electric believes that a permanent waiver of 52 Pa. Code § 56.97(a) will continue to provide helpful and timely options for customers who are confronted with the possibility of termination of service. Allowing customers to establish

their own payments/agreements provides convenience without negating other Chapter 56 consumer protections or eliminating the ability to speak with a Company customer service representative. Further, the success of the online and automated payments/agreements through the Website and IVR systems has clearly demonstrated the importance of continuing to offer these self-serve options to customers.

16. For these reasons, as more fully explained below, PPL Electric believes that its proposal to continue to offer the expanded Website and IVR systems on a permanent basis is reasonable, effective, and in the public interest.

**B. Background and Overview of PPL Electric's Expanded Website and IVR Systems**

17. To accommodate customers' needs to communicate with the Company in a timely manner, PPL Electric offers a variety of communication avenues, such as telephone, e-mail, fax, Website, IVR, and written correspondence.

18. Historically, the telephone was the primary means through which customers contacted PPL Electric to address their inquiries and concerns. However, with the advent of the Internet, the communications profile for PPL Electric's customers has dramatically changed. For example, in 2011 PPL Electric's Customer Contact Center processed over 6.6 million customer contacts through its telephone, Website, and IVR systems.<sup>1</sup> Of this total, 59.4% (3.9 million) were self-serve transactions -- Website (2,239,682) and IVR (1,700,296). The remaining customer contacts in 2011 were live telephone transactions with a customer service representative ("CSR") (2,690,243). The following table below illustrates that the "self-service" transactions for PPL Electric have more than doubled since 2008.

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<sup>1</sup> This total includes inbound calls handled, Website transactions completed, and successful IVR contacts.

<b>Year</b>	<b>Web Transactions</b>	<b>IVR Transactions</b>	<b>Total Web and IVR Transactions</b>	<b>CSR Telephone Transactions</b>	<b>Total Web, IVR and CSR Telephone Transactions</b>
2015	3,028,986	1,680,360	4,709,346	2,258,143	6,967,489
2014	2,943,207	1,236,215	4,179,422	2,613,887	6,793,309
2013	2,536,978	1,130,180	3,667,158	2,311,693	5,978,851
2012	3,117,155	1,487,678	4,604,833	2,208,927	6,813,760
2011	2,239,682	1,700,296	3,939,978	2,690,243	6,630,221
2010	1,649,056	992,871	2,641,927	2,559,391	5,201,318
2009	1,330,030	764,591	2,094,621	2,120,932	4,215,553
2008	1,203,092	790,346	1,993,438	2,263,655	4,257,093

When comparing self-service transactions (Website and IVR) in 2011 to 2015, the number of self-service transactions has increased by 19.53% -- from 3,939,978 in 2011 to 4,709,346 in 2015 -- and represents over 67% of the total customer contacts in 2015. PPL Electric anticipates this upward trend will continue in the future.

19. Under PPL Electric's current procedures, after receiving an initial termination notice, customers have the option, with certain limitations discussed below, to make a payment or set up payment agreements to avoid termination of service by accessing the Website or IVR systems at the customer's convenience.

20. Customers are informed about the reasons for termination in the 10-day termination notice. Through the Website and IVR systems, customers are automatically advised of all available methods for avoiding termination of service through links on the Website system and automated prompts on the IVR system. Further, PPL Electric has designed the expanded systems to provide either written (Website) or automated (IVR) reminders that customers may speak directly with a customer service representative.

21. Through the Website and IVR systems, the initial welcome screen (Website) or prompt (IVR) provides specific information such as the balance, past due amount, and scheduled termination of service date. The next screen or prompt (Payment Assistance Options) provides

several payment options, such as paying the reinstatement amount, reporting a payment, or establishing a payment agreement. There also are instructions on how to proceed with a payment agreement and details regarding the terms of the agreement and availability of universal service programs, such as Low-Income Home Energy Assistance Program (“LIHEAP”) and Customer Assistance Program (“CAP”), if the customer is eligible.

22. Payment agreements established through the Website and IVR systems use the same criteria followed by PPL Electric’s customer service representatives. The Website and IVR systems will request or update financial information to determine the agreement terms. Customers will be offered budget billing and, if appropriate based on their household income, referrals to universal service programs such as LIHEAP and CAP. As described below, PPL Electric sends confirmations to customers after they have completed the transaction.

23. Under the Website and IVR systems, PPL Electric does not require customers to complete payment agreement transactions that they do not understand. Once a customer starts to use the Website or IVR systems to establish a payment agreement, the customer may cancel the transaction at any time if he or she does not understand the terms or does not have time to complete the transaction. If a customer cancels the transaction, the systems provide a reminder that the termination of service will continue as scheduled, and that the customer should call PPL Electric to discuss his or her concerns. The systems also provide PPL Electric’s toll-free telephone number and Call Center hours of operation. Further, if the customer received a termination notice from PPL Electric, the notice also includes toll-free telephone numbers for both the Commission and PPL Electric.

24. After a customer selects the payment agreement option, the system presents that customer with the terms of his or her payment agreement. The system will ask the customer if

he or she is in agreement with the terms. If the customer using the Website system answers “no,” the Website presents a message that directs the customer to call PPL Electric to discuss other options. Similarly, if the customer using the IVR system answers “no” to the proposed payment agreement terms, the IVR immediately forwards the customer to a customer service representative.

25. Importantly, customers using the Website or IVR systems to establish payment agreements always have the opportunity to speak directly with a customer service representative 24 hours a day seven days a week.

26. For those customers who elect to use the Website or IVR to establish a payment agreement, PPL Electric automatically sends a follow-up e-mail for Website transactions or letter for IVR transactions. The purpose of these follow-up communications is to summarize and confirm the completed transaction, and explain the steps the customer should take in the event he or she disagrees with or does not understand the payment agreement. These e-mail or letter communications include PPL Electric’s toll-free telephone number and Call Center hours of operation.

27. In the 10-day termination notice, customers are advised about emergency provisions for medical certifications. Under the Website and IVR systems, customers also are provided with information about medical certifications. The Website and IVR systems provide medical certification information and ask if a medical condition exists in the home. If the customer answers “yes,” the system automatically places a three-day hold on any collection activity. A second message provides an explanation of how a customer can proceed with having a doctor, nurse practitioner or physician’s assistant contact PPL Electric to report a medical

condition. However, these customers continue to have the opportunity to establish or reinstate a payment agreement through the Website and IVR systems.

28. Under the Website and IVR systems, residential customers have additional protection against shut-offs. PPL Electric has linked payments completed through the Website or IVR systems to its electronic system that produces work orders for field personnel who, among other things, terminate electric service. For example, if a service termination was scheduled for Monday and the customer made a payment -- such as the full overdue balance or an amount sufficient to reinstate a defaulted payment agreement -- on a Saturday or Sunday through the Website or IVR systems, the system would automatically cancel the termination work order and update the Company's customer information system.

29. PPL Electric believes that allowing residential customers to establish, within limits, payments/agreements via its Website or IVR systems provides substantial benefits to its customers. Important benefits for customers include, but are not limited to, the following: (a) providing two additional means by which customers may establish payments/agreements to avoid service termination; (b) providing a means by which customers can, within limits, respond to termination notices outside normal business hours; (c) responding to the growing use of online and automated resources to manage billing and payment matter; (d) avoiding further collection action, such as termination of service; (e) offering options to customers, such as making an immediate payment or establishing a payment agreement, that fit their needs; and (f) providing automatic referrals to assistance programs, such as LIHEAP and CAP, for eligible customers.

30. Similarly, PPL Electric believes that allowing residential customers to establish payments/agreements via its Website or IVR systems provides substantial benefits to PPL Electric. Key benefits for PPL Electric include, but are not limited to, the following: (a)

improving customer satisfaction; (b) providing more flexibility to customers in addressing their overdue bills; (c) reducing Commission complaints, including Payment Assistance Requests and termination of service; and (d) helping PPL Electric to better manage its call volume.

**C. Success of PPL Electric's Website and IVR Systems**

31. The key objectives of the Website and IVR systems during the waiver periods were to: (a) determine if customers with overdue balances would use the self-serve payment options; (b) identify system or process issues impeding participation in the online and automated payment arrangements; (c) offer customers more payment options and control; (d) provide customers with the flexibility to communicate with PPL Electric beyond normal business hours; and (e) reduce service terminations for payment-troubled customers.

32. In its *2012 Waiver Order*, the Commission directed PPL Electric to, among other things, submit annual statistical reports to Commission's Bureau of Consumer Services ("BCS") and OCA by February 15th of every year beginning in 2014.<sup>2</sup> See *2012 Waiver Order*, pp. 15-16. The reports submitted to date are available at

[http://www.puc.state.pa.us/about\\_puc/consolidated\\_case\\_view.aspx?Docket=P-2012-2327036](http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=P-2012-2327036).

33. PPL Electric identified customer use of the Website and IVR systems to set up payment agreements and make payments. As shown below, from January 1, 2013 through June 30, 2016, there were a total of 1,767,462 payment agreements established or payment transactions made using the Website and IVR systems. Of this total, 466,039 transactions (26%) were payment agreements set up through the Website or IVR systems. The number of

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<sup>2</sup> The 2012 Waiver Order also directed the Company to submit a comprehensive report to the Commission and OCA 60 days prior to the expiration of the four-year waiver for the website and IVR systems. See *2012 Waiver Order*, pp. 15-16. The comprehensive report requested by the 2012 Waiver Order will be provided on or before November 1, 2016.

transactions made using the Website and IVR systems to establish payment agreements were 90,529 (19.4%) and 375,510 (80.6%), respectively.

<b>Transaction</b>	<b>Website</b>	<b>IVR</b>	<b>Total</b>
Payments	851,571	449,852	1,301,423
Payment Agreements	90,529	375,510	466,039
<b>Total</b>	<b>942,100</b>	<b>825,362</b>	<b>1,767,462</b>

34. Based on the foregoing, providing customers with the option for online and automated payments/agreements through the Website and IVR systems has been highly successful. Further, given the number of customers using the Website and IVR systems to establish payments/agreements, it is clear that customers routinely rely upon and expect the convenience offered by the Website and IVR systems to avoid termination. PPL Electric anticipates customers will continue to use the Website and IVR systems for online and automated payments/agreements if available in the future.

**D. A Permanent Waiver for the Website and IVR Systems is in the Public Interest**

35. In its *2012 Waiver Order*, the Commission provided that PPL Electric may request a permanent waiver for the Website and IVR payment arrangement systems before the expiration of the current four-year waiver. *See 2012 Waiver Order*, pp. 15-16. PPL Electric herein requests a permanent waiver to allow it to continue to offer customers the same option of online and automated payments/agreements through the Website and IVR systems to avoid termination. Importantly, the Company is proposing to continue offer the same Website and IVR capability that was previously approved by the Commission and has been in effect since early 2011.

36. It cannot be reasonably disputed that consumers are completing more and more interactions with businesses of all types through online and/or automated systems. This is consistent with customers' use of PPL Electric's Website and IVR systems.

37. As shown above, PPL Electric has experienced a significant increase in customer self-service transactions via the Website or IVR systems. The number of self-service transactions has grown from approximately 3.9 million in 2011 to about 4.7 million in 2015. These types of self-service interactions for PPL Electric are continuing to grow every year. If present trends continue, the Company estimates that it could see as many as 5 million Website or IVR transactions in 2016.

38. Given customers' proclivity to use online and automated means for completing transactions and the success of PPL Electric's Website and IVR systems, the Company believes that continuing to provide customers with the permanent option of using the Website and IVR systems to set up payments/agreements to avoid termination provides better service by giving customers more flexibility and additional options to avoid service termination.

39. Importantly, customers have had the option of using the Website and IVR systems to set up payments/agreements since early 2011. PPL Electric submits that customers have become accustomed to and expect the convenience of online and automated payment arrangements. PPL Electric respectfully requests that the Commission grant the requested waiver to ensure that customers will not lose this additional and convenient resource to avoid termination of service.

40. Again, as explained above, customers using the Website or IVR to establish payments/agreements have numerous opportunities to speak with a PPL Electric customer service representative. Further, after completing a transaction, the Company sends the customer

a confirmatory communication via e-mail or letter, which summarizes the transaction and provides PPL Electric's toll-free telephone number and Call Center hours of operation.

41. Most of the costs associated with the Website and IVR systems were the initial implementation costs, *i.e.*, staff time needed for planning, computer programming, and testing of the Website and IVR systems. The online and automated payment arrangement options under the Website and IVR systems have been fully implemented. As a result, PPL Electric does not expect to incur any additional incremental costs to continue the payment arrangement options through the Website and IVR systems on a permanent basis.

42. Granting a permanent waiver for the online and automated payments/agreements through the Website and IVR systems also will avoid the time and resources expended by parties and the Commission for repeated filings requesting waivers for the Website and IVR systems. The Company has previously sought and obtained two temporary waivers for the Website and IVR systems. As explained above, the online and automated payments/agreements through the Website and IVR systems have been highly successful and no problems or issues have been identified since the systems became operational in 2011. Under these circumstances, PPL Electric submits that it would not be an appropriate use of the parties' and Commission's time and resources to reject the requested permanent waiver and, instead, require the Company to repeatedly file waiver requests for the Website and IVR systems.

43. As demonstrated from the success of PPL Electric's Website and IVR systems, permitting customers to continue to use the Website and IVR on a permanent basis to establish payments/agreements to avoid termination will provide several important benefits to both PPL Electric and its customers as explained above. Granting a permanent waiver for the Website and IVR systems will allow these important public benefits to continue uninterrupted.

44. Based on the foregoing, PPL Electric believes that its proposal to continue to offer customers the permanent option of using the Website and IVR systems to establish payments/agreements to avoid termination is reasonable, effective, and in the public interest. Accordingly, PPL Electric is requesting that it be granted a permanent waiver from the requirement in Section 56.97(a) that an “authorized employee explain” the reasons for the proposed termination and the available methods for avoiding termination, and allow PPL Electric to continue to offer customers the permanent option of using the Website and IVR systems to establish payments/agreements to avoid termination.

### **III. CONCLUSION**

45. PPL Electric believes that its proposal to offer customers the permanent option of using the Website and IVR systems to make payments or establish payment agreements to avoid termination, together with the continued ability to directly contact a customer service representative at any time during the Call Center hours of operation, provides important benefits to both PPL Electric and its customers and, therefore, is in the public interest. Accordingly, PPL Electric respectfully requests that the Commission grant the Company’s Website and IVR capabilities, as described herein, a permanent waiver from strict compliance with Section 56.97(a).

46. PPL Electric further requests that the Commission consider this Petition on an expedited basis. Timely approval of this Petition is important because the four-year waiver for the Website and IVR program expires on December 31, 2016. In order to continue to provide the successful benefits of the expanded Website and IVR systems without interruption to customers, it is important that this Petition be ruled upon before the current temporary waiver expires.

47. If the Commission is unable to rule on this Petition prior to December 31, 2016, the Company respectfully requests that, in the alternative, the Commission issue an Order or Secretarial Letter extending the current waiver of 52 Pa. Code 56.97(a) until such time that the Commission can fully consider this Petition. This will allow residential customers who have overdue balances the opportunity to continue receiving the benefits and convenience of making payments or establishing their own payment agreements through the Website and IVR systems to avoid termination of service.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Commission grant a permanent waiver from Section 56.97(a), and allow PPL Electric Utilities Corporation to offer customers the permanent option of using the Website and IVR systems to make payments and establish payment agreements to avoid termination.

Respectfully submitted,

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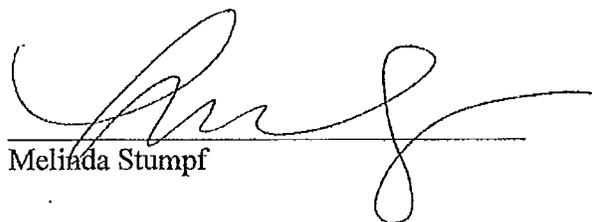
Date: August 5, 2016

*Attorneys for PPL Electric Utilities Corporation*

**VERIFICATION**

I, Melinda Stumpf, being the Manager of Regulatory Program and Business Services at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 8/4/16

  
Melinda Stumpf