

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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August 29, 2016

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17120

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-2016-2560140

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Answer, Notice of Intervention, and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

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

Attachment

cc: Office of Administrative Law Judge  
Certificate of Service

225379

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-2016-2560140
Establish Payment Agreements Online or	:	
through an Automated Interactive Voice	:	
Response System.	:	

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NOTICE OF INTERVENTION

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Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence, notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Aron J. Beatty  
Senior Assistant Consumer Advocate  
PA Attorney I.D. No. 86625  
E-mail: [abeatty@paoca.org](mailto:abeatty@paoca.org)

Christy M. Appleby  
Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
E-Mail: [cappleby@paoca.org](mailto:cappleby@paoca.org)

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Respectfully submitted,

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

Date: August 29, 2016

PUBLIC STATEMENT OF THE  
OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file an Answer and intervene in the proceedings before the Commission involving PPL Electric Utilities Corporation (PPL or the Company).

On August 5, 2016, PPL Electric Utilities Corporation (PPL or Company) filed a petition which requests the Pennsylvania Public Utility Commission (Commission) grant 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.” PPL’s request for a permanent waiver follows two prior interim waivers granted by the Commission.

The Office of Consumer Advocate files an Answer and Intervention in this proceeding to ensure that the interests of consumers are protected in this proceeding.

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities :  
Corporation for a Permanent Waiver of 52 :  
Pa. Code § 56.97(a) to Allow Customers to : Docket No. P-2016-2560140  
Establish Payment Agreements Online or :  
through an Automated Interactive Voice :  
Response System :

I hereby certify that I have this day served a true copy of the following documents, the Office of Consumer Advocate's Answer, Notice of Intervention and Public Statement, 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 29<sup>th</sup> day of August 2016.

SERVICE BY HAND DELIVERY and FIRST CLASS MAIL

Bureau of Investigation & Enforcement  
400 North Street  
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

David B. MacGregor, Esquire  
Christopher T. Wright, Esquire  
Post & Schell PC  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101

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

Paul E. Russell, Esquire  
Kimberly A. Klock, Esquire  
PPL Electric Utilities Corporation  
2 North Ninth Street  
Allentown, PA 18101

/s/ Christy M. Appleby

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