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June 15, 2017

VIA E-Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

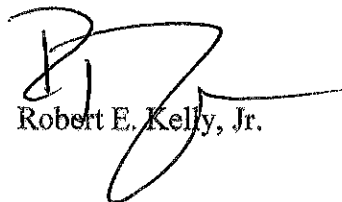
Re: *Hampden Township v. PPL Corporation and PPL Electric Utilities Corporation, No. C-2017-2604425*

Dear Ms. Chiavetta:

Enclosed for filing is the Answer of Hampden Township to the Preliminary Objections of PPL Corporation and PPL Electric Utilities Corporation.

Please contact us at your convenience if you have any questions.

Very truly yours,



Robert E. Kelly, Jr.

REK/wlh
Enclosures
cc w/enc.:

Kimberly A. Klock, Esquire
Office of Trial Staff/Bureau of Investigation and Enforcement
Office of Consumer Advocate
Office of Small Business Advocate

BEFORE THE PUBLIC UTILITY COMMISSION
OF THE
COMMONWEALTH OF PENNSYLVANIA

| | |
|------------------------|----------------------|
| HAMPDEN TOWNSHIP | : |
| | : |
| vs. | : No. C-2017-2604425 |
| | : |
| PPL CORPORATION and | : |
| PPL ELECTRIC UTILITIES | : |
| CORPORATION | : |

ANSWER OF HAMPDEN TOWNSHIP TO PRELIMINARY OBJECTIONS

Hampden Township, by and through its attorneys, Kelly, Parker & Cohen LLP, pursuant to the Regulations of the Pennsylvania Public Utility Commission (“Commission”), 52 Pa. Code, § 5.101((f)(1), respectfully files its Answer to the Preliminary Objections “(Objections)” of PPL Corporation and PPL Electric Utilities Corporation (“PPL Electric”) and, in support, sets forth the following:

1. The averments in Paragraph One (1) are admitted.
2. The averments contained in Paragraph Two (2) constitute legal conclusions to which no response is required.
3. The averments in Paragraph Three (3) are admitted upon information and belief.

By way of further Answer, the Preliminary Objections were not received by Hampden Township until June 9, 2017 although purportedly mailed on June 5, 2017.

4. The averments in Paragraph Four (4) merely purport to identify the filing of PPL Corporation and PPL Electric to which no response is required.

5. The averments in Paragraph Five (5) merely purport to characterize the Regulations of the Commission and constitute a legal conclusion to which no response is required.

6. The averments in Paragraph Six (6) merely purport to characterize the Regulations of the Commission and constitute a legal conclusion to which no response is required.

7. The averments in Paragraph Seven (7) constitute legal conclusions to which no response is required.

8. The averments in Paragraph Eight (8) constitute legal conclusions to which no response is required.

9. The averments in Paragraph Nine (9) constitute legal conclusions to which no response is required.

10. The averments in Paragraph Ten (10) constitute legal conclusions to which no response is required.

11. The averments in Paragraph Eleven (11) constitute legal conclusions to which no response is required.

12. The averments in Paragraph Twelve (12) constitute legal conclusions to which no response is required.

13. The averments in Paragraph Thirteen (13) constitute legal conclusions to which no response is required. To the extent deemed factual in nature, they are denied.

14. The averments in Paragraph Fourteen (14) constitute legal conclusions to which no response is required.

15. The averments in Paragraph Fifteen (15) constitute legal conclusions to which no response is required.

16. The averments in Paragraph Sixteen (16) constitute legal conclusions to which no response is required.

17. The averments in Paragraph Seventeen (17) constitute legal conclusions to which no response is required.

18. The averments in Paragraph Eighteen (18) constitute legal conclusions to which no response is required.

19. The averments in Paragraph Nineteen (19) constitute legal conclusions to which no response is required.

20. The averments contained in Paragraph Twenty (20) merely set forth the relief sought by PPL Corporation and PPL Electric to which no response is required. To the extent deemed factual in nature, they are denied.

21. Paragraph Twenty-One (21) merely incorporates Paragraphs 1-20 and, accordingly, no further response is required. By way of further answer, the averments contained in Paragraph 1-20 above are incorporated by reference.

22. The averments contained in Paragraph Twenty-Two (22) are admitted upon information and belief.

23. The averments in Paragraph Twenty-Three (23) constitute legal conclusions to which no response is required.


24. The averments in Paragraph Twenty-Four (24) constitute legal conclusions to which no response is required.

25. The averments in Paragraph Twenty-Five (25) constitute legal conclusions to which no response is required.

26. The averments contained in Paragraph Twenty-Six (26) merely set forth the relief sought by PPL Corporation and PPL Electric to which no response is required. To the extent deemed factual in nature, they are denied.

WHEREFORE, Hampden Township respectfully requests that the Preliminary Objections of PPL Corporation and PPL Electric Utilities Corporation be denied.

Respectfully submitted:



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Attorneys for Hampden Township

Dated: June 15, 2017

CERTIFICATE OF SERVICE

I, hereby certify that I have this day served a true and correct copy of the foregoing
ANSWER TO PRELIMINARY OBJECTIONS upon the parties, listed below, in accordance
with the requirements of 52 Pa. Code § 1.54:

VIA PUC Electronic Filing System

Kimberly A. Klock, Esquire
Amy E. Hirakis, Esquire
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United States First Class Mail

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Dated this 15th day of June, 2017.



Robert E. Kelly, Jr.