



COMMONWEALTH OF PENNSYLVANIA

April 26, 2019

E-FILED

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

Re: Application of PPL Electric Utilities Corporation For Approval of the Transfer by Sale to City of Lancaster of Electrical Facilities Located In the City of Lancaster, Lancaster County, PA / Docket No. A-2019-3008669

Dear Secretary Chiavetta:

Enclosed please find the Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Shelby A. Linton-Keddie'.

Shelby A. Linton-Keddie
Assistant Small Business Advocate
Attorney ID No. 206425

Enclosures

cc: Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities Corporation for Approval of the Transfer by Sale to the City of Lancaster of Electrical Facilities Located in the City of Lancaster, Lancaster County, PA : : **Docket No. A-2019-3008669**

**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

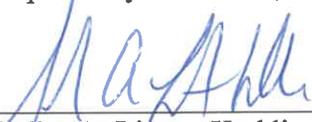
The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the above-captioned Application of PPL Electric Utilities Corporation (“PPL” or the “Company”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on March 18, 2019, and that seeks approval to transfer by sale certain lighting facilities to the City of Lancaster. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Shelby A. Linton-Keddie, Esquire
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, Pennsylvania 17101
(717) 783-2525
(717) 783-2831 (fax)
slinton-ke@pa.gov

Respectfully submitted,



Shelby A. Linton-Keddie
Assistant Small Business Advocate
Attorney ID No. 206425

For:
John R. Evans
Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
(717) 783-2525

Date: April 26, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities :
Corporation for Approval of the :
Transfer by Sale to the City of Lancaster : **Docket No. A-2019-3008669**
of Electrical Facilities Located in the City :
of Lancaster, Lancaster County, PA :

**PUBLIC STATEMENT OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Notice of Intervention for the proceeding related to the above-captioned Application of PPL Electric Utilities (“PPL” or “Company”).

The Company’s proposed Application, if approved, would allow PPL to transfer, by sale, certain lighting facilities to the City of Lancaster. The purchase price of the sale is \$2,614,847. The requested transfer, if approved, would allegedly allow the City of Lancaster to experience significant cost savings by moving from Rate Schedule SHS to Rate Schedule SE, PPL will be relieved of owning, operating, and maintaining the transferred property, and it is projected that there will be no negative impact on PPL’s operations because of the transfer.

The Small Business Advocate filed a Notice of Intervention regarding the Company's proposed transfer and sale to protect the interests of the utility's small business customers. A thorough inquiry by the Public Utility Commission into all the elements of the Company's request for the sale and transfer of property to the City of Lancaster is necessary to ensure that the Company's transfer of these assets, including the claim that there will be no negative results on Company operations upon transfer of this property, is just and reasonable.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the proposed sale and transfer of the aforementioned property. The Small Business Advocate will ask the Commission to deny any request by the Company that is not proven by PPL to be lawful, just, reasonable and non-discriminatory to all its customer classes.

Dated: April 26, 2019

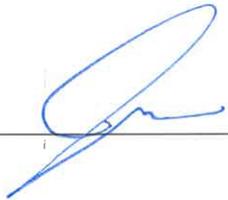
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities :
Corporation For Approval of the :
Transfer by Sale to City of Lancaster of : **Docket No. A-2019-3008669**
Electrical Facilities Located In the City :
of Lancaster, Lancaster County, PA :

VERIFICATION

I, John R. Evans, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect 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: April 26, 2019



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities :
Corporation For Approval of the :
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Electrical Facilities Located In the City :
of Lancaster, Lancaster County, PA :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Joel H. Cheskis
Deputy Chief Administrative Law Judge
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Harrisburg, PA 17120
jcheskis@pa.gov
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(Counsel for PPL)

DATE: April 26, 2019



Shelby A. Linton-Keddie
Assistant Small Business Advocate
Attorney ID No. 206425