

**Re: Pennsylvania Public Utility Commission v. PPL  
Electric Utilities Corporation;**

**Petition of PPL Electric Utilities :  
Corporation for Approval of a Default :  
Service Program and Procurement : Docket No. P-2008-2060309  
Plan for the Period January 1, 2001 :  
through May 14, 2014**

January 8 , 2009

Paul E. Russell, Esquire  
Associate General Counsel  
PPL Electric Utilities Corp.  
Two North 9th Street  
Allentown, PA 18101-1179

Dear Mr. Russell:

Enclosed please find Eric Epstein's Response to the the Following Interrogatories of PPL Electric Utilities Corporation in the above-referenced proceeding:

Set I, Question 1.

Copies of these Interrogatories will be mailed via the United States Postal Service or electronic mail to all parties identified in the most recent Certificate of Service.

Sincerely,

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Eric Epstein's Response to Interrogatories  
of PPL Electric Utilities Corporation, Set 1  
**Docket No. P-2008-2060309**

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Q: What customer classes are expected to pay for the costs of of the rate discounts (Senior Rate and Green Weekend rates) and rebates (Space Heater Exchange Program.)

A: No additional funding from rate payers is required.

The programs are funded through P3 partnerships, TOU programming (Please refer to PPL Response to Epstein Set 1, No. 8, "Insights from PPL Electric Utilities' Residential Summertime Time of Use Pilot), off-peak rate schedules, (1) and shareholder assets.

PPL already offers an Emergency Energy Conservation Rider (2), a Remand Rider which provides for the refund of Hurricane Isabel costs, (3) Economic Development Initiatives Riders "to provide an incentive rate billing option to existing commercial and industrial customers, and new industrial customers to encourage economic development in the Company' service area" (4), Industrial Development Initiatives Riders "provide an incentive rate billing option to existing commercial and industrial customers, and new industrial customers to encourage economic development in the Company' service area" (5), a Renewable Energy Rider "allows customers to install and operate renewable energy generation" (6), and an experimental Demand Side Initiative Rider. (7)

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<sup>1</sup> PP&L's General Tariff, "Rules and Rate Schedules for Electric Service," Issued: December 19, 2008; Effective: January 1, 2009,

The definition for peak hours has been established on Electric Pa. P.U.C., No 201, Page 23 A. In addition, termination rules could be modeled on Rate Schedule DSR-R Page No 23 B.

Off peak hours have been established. For example, reference Twelfth Revised page No. 24. Also refer to Thirteenth Revised page No. 20 B or Rate Schedule GS-3, Thirteenth Revised page No. 25A.

Consumption adjusted rates are in place, and the senior rate is a variation of an existing tariff model. The Senior Rate can also be financed through shareholder contributions which are tax deductible. In addition, the built-in 10.86% guaranteed returns on PPL's loans as part of the Restructuring Settlement provides shareholders with an additional source of income for the program. Other rate classes are able to make voluntary contributions through the savings that flow back to their customers under the Remand Rider.

Programming can be marketed and implemented by partnering with senior based organizations who already receive senior based tariffs under Rate Schedule GS-1 Fourteenth Revised page No. 24 C. "Non-Profit Senior Citizen Center."

The Green Weekend rate is a natural extension of TOU programming (See PPL's testimony) and existing rate structure under Tariff #69. Green Weekend recipients also provide built-in counseling and space for low-income programming and the space heater exchange

The successful lawn mower exchange program implemented by PPL is the point of departure for the space heater program. Please refer to the PPL web site where numerous comments and plaudits are offered by PPL in support of this program. This program will also parent with religious non-profits to move low-income rate payers off of the uncollectible roles and serve as a safety net against home fires.

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3 General Tariff, "Rules and Rate Schedules for Electric Service," Issued: December 19, 2008; Effective: January 1, 2009, Third Revised p. 17

4 Second Revised Page No 18 C.

5 Fourth Revised Page No. 19 D.

6 Fourth Revised page No. 19 L.

7 Fourth Revised page No. 19 T.

Rate Schedule RTD (R) actually acknowledges space heating challenges: “Residential service that includes more than 2,00 watts of connected load attributable to commercial or professional use exclusive of space heating and air conditioning in common with residence.” (Seventh Revised, Page No. 22 BN).

In addition, PPL’s much publicized E-store offers an additional location for the distribution of space heaters. Returns can be modeled on the program PPL organized in Lancaster County.

Residential customers would pay half of the stated store price to be eligible for participation. PPL can offer the heaters at their internet site.

## CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the active participants named below by US mail or hand delivery in accordance with the requirements of 52 Pa. Code § Section 1.54.

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Dated: January 8, 2009