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April 7, 2010

BY HAND

James J. McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
PO Box 3265
Harrisburg, PA 17105-3265

RECEIVED
2010 APR -7 PM 3:47
SECRETARY'S BUREAU

RE: Proposed Policy Statement Regarding Utility Service Outage Public Notification Guidelines
Docket No. M-2008-2065532

Dear Secretary McNulty:

Enclosed please find the original and fifteen copies of the Comments of PPL Electric Utilities Corporation for the above-referenced proceeding. Copies have been provided as indicated.

Respectfully Submitted,


Christopher T. Wright

CTW/skr
Enclosures
cc: Elizabeth Barnes (*via email - ebarnes@state.pa.us*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

RECORDED
2010 APR -1 PM 3:47
P.A.U.P.S. BUREAU
SECRETARY

Re: Proposed Policy Statement Regarding :
Utility Service Outage Public Notification : Docket No. M-2008-2065532
Guidelines. :

**COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

I. INTRODUCTION

By Order entered November 10, 2009, the Public Utility Commission (“PUC” or the “Commission”) requested comments on the Proposed Policy Statement Regarding Utility Service Outage Public Notification Guidelines (hereinafter, “Proposed Policy”), which is intended to provide guidance regarding the types of public notice necessary to meet the reasonableness standard in the Public Utility Code at 66 Pa.C.S. § 1501. The stated purpose of the Proposed Policy is to help ensure that actual, timely, and consistent notice to customers is provided by electric distributions companies (“EDCs”) whenever any event disrupts service or potentially endangers public safety. The Proposed Policy was published in the *Pennsylvania Bulletin* on March 6, 2009, with a 30-day comment period. By Secretarial Letter dated April 1, 2010, the comment period was extended until April 7, 2010.

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) is a “public utility” and an “electric distribution company” as those terms are defined under the Public Utility Code, 66 Pa.C.S. §§ 102 and 2803, 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.

PPL Electric has a long-standing and well-proven commitment to providing detailed information regarding extended customer service outages to its customers, the public, the media, and the Commission. The Company continuously seeks cost-effective opportunities to improve its service to customers and to implement service-related changes in a timely manner, including the use of new technology where appropriate.

PPL Electric appreciates this opportunity to comment on the Commission's Proposed Policy and the potential impacts that the policy may have with respect to utility service outage notification. These comments are based on feedback the Company receives directly from the Commission, the media, and from its quarterly external and internal market research with customers.

PPL Electric uses a "command and control" philosophy in responding to significant service interruption events. Conference calls are scheduled regularly during a service interruption event and include PPL Electric Operations group, support groups, Corporate Communications, and regional Community Relations personnel. All messages are reviewed by personnel in the system emergency room before being released to the media, the Commission, and the public. This information is then disseminated throughout PPL Electric's organization to all employees and through regular updates to the Commission, media, and public. Regular updates to the call center, web site, interactive voice response system, media web site, news releases, and outbound calling programs are all part of this process. The Company's experience shows that both customers and the news media are very aware of the existence of PPL Electric's

outage web site. Further, a special outage center is activated during significant outages to provide continuously updated, region-specific information to customers and news media. During an outage emergency, Company spokespersons remind media representatives of the updated outage center.

PPL Electric recognizes the Commission's initiative to provide guidelines regarding the notification of service outages. The Company believes, however, that its current notification practices are cost-effective and best suited to the needs of its customers and the media. The Company also believes that its current practices generally achieve the objectives of the Proposed Policy. Given the effectiveness of its current notification system, it is PPL Electric's position that the guidelines set forth in the Proposed Policy are not necessary. The Proposed Policy fails to account for effective notification plans that are currently in place. To abandon current, proven notification systems and implement systems consistent with the guidelines set forth in the Proposed Policy could require substantial resources, training, and costs with little or no benefit.

For these reasons, PPL Electric believes that it is not necessary to adopt the Proposed Policy. However, to the extent that the Commission adopts a new policy statement regarding notification guidelines, PPL Electric offers the following specific comments and recommendations.

II. COMMENTS OF PPL ELECTRIC

A. Section 69.1901. Scope.

On its face, the policy statement appears to apply only to EDCs. PPL Electric believes that it is appropriate and reasonable that the Proposed Policy apply to all fixed service utilities.

B. Section 69.1902. Notification Guidelines.

1. Section 69.102(a). Acceptable Methods of Public Notification.

Section 69.102(a) of the Proposed Policy sets forth acceptable methods of public notification. However, the Proposed Policy fails to account for future advances in technology. Rather than restrict notification to a specific set of methods, the Proposed Policy should encourage EDCs to adapt their notification methods to reflect advances in technology and implement notification practices that are best suited to the EDCs and their customers. With the rate at which technology advances, the current notification methods suggested in the Proposed Policy may soon become obsolete as technology evolves. For example, PPL Electric is now using Twitter to provide updates to “followers” regarding outages. This notification method could not have been envisioned just a few years ago.

As a result, the Company does not believe that a requirement, which specifies the use of technology and/or which technologies a utility should use, would be beneficial. For these reasons, to the extent the Commission adopts a policy statement on notification guidelines, PPL Electric recommends that Section 69.1902(a) be modified to reflect a policy of encouraging EDCs to adapt their notification methods to reflect advances in technology and implement notification practices that are best suited to the EDCs and their customers.

2. Section 69.102(b). NIMS Standards.

The Proposed Policy provides that utilities should strive to adopt the National Incident Management System (“NIMS”) and its Public Information System to organize all information

throughout the utility into one, unified message. PPL Electric Utilities currently has notification plans in place that mirror the objectives of NIMS, and that are working well. The implementation of the NIMS standards and plans will require additional resources, efforts, and costs with little or no benefit.

As explained above, PPL Electric's current system effectively notifies customers of service outages through the use of a unified message that has been approved by the Company prior to release to customers, the media, the Commission, or the public. PPL Electric believes that its current system adequately meets the purpose of the proposed Section 69.102(b) without the required expense and effort to implement the NIMS. Therefore, under these circumstances, PPL Electric recommends that the Commission delete Section 69.102(b) of the Proposed Policy.

3. Section 69.1902(c). Contact Information.

Section 69.1902(c) generally provides that utilities should consider having a knowledgeable contact person stationed in the area of the outage during the emergency to communicate to the media and the public as necessary. Subsection 69.1902(c)(1) further provides that utilities should provide talking points and informational sheets to customer service representatives, linepersons, and others who may come in contact with the public during an outage. The stated purpose is to strive for consistency in the information passed onto the public regarding an outage.

As explained above, PPL Electric currently has a notification system in place that effectively notifies customers of service outages through the use of a unified message that has been approved by the Company prior to release to customer, the media, the Commission, or the public. Under PPL Electric's current notification practice, communications between field personnel and the public is limited to the specific service outages they are working and/or the area where they are located. In these situations, PPL Electric believes it is reasonable and

appropriate that field personnel can and do provide information regarding a specific service outage and/or area without the use of talking points or information sheets. PPL Electric's current practice ensures that the information provided by the Company, whether through a spokesperson, customer service representative, or field personnel, is consistent and accurate. Accordingly, PPL Electric recommends that Section 69.1902(c)(2) be deleted from the Proposed Policy.

4. Commission-sponsored Website.

In the Order issuing the Proposed Policy, the Commission states as follows:

The Commission is considering developing a page on the Commission's web site whereby EDCs would upload outage information twice daily (that is, 6 a.m. and 6 p.m.). The public could then go to the Commission's web site and open a workbook to see outage status. This format would only be activated for long-term outages. The Commission is seeking comment on the feasibility of this proposal as well as a definition for "long term outage" and "number of customers affected" threshold tests before the update would be required.

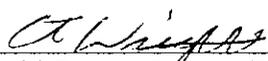
PPL Electric does not believe that a Commission-sponsored website for outage notification is necessary. Customers have an established relationship with their respective EDCs and have been provided information through customer bills on the various methods to contact an EDC, including in the event of an outage. PPL Electric's customers rely on the Company and local media for information regarding service outages in their respective areas. Further, in the case of outage emergencies, the suggested outage information is provided on PPL Electric's website. To require EDCs to upload outage information to the Commission's website would be duplicative and unnecessary. Moreover, there is no indication that customers routinely check the Commission's website for outage status updates. Accordingly, PPL Electric does not believe that a Commission-sponsored web site would provide any significant improvement to this process.

III. CONCLUSION

As stated above, PPL Electric continuously seeks opportunities to improve upon its service to customers and to implement service-related changes in a timely manner, including the use of new technology where appropriate. Based on feedback the Company receives directly from its quarterly external and internal market research with customers, the media, and the Commission, PPL Electric respectfully requests that the Commission modify its Proposed Policy consistent with the Company's comments.

Respectfully submitted,

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Date: April 7, 2010

Attorneys for PPL Electric Utilities Corporation