

RECEIVED

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION      MAY 3 2010

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

SOPHIA SARANTAKOS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2010-2169749

**PETITION TO JOIN AN INDISPENSABLE PARTY**

PPL Electric Utilities Corporation (hereafter "PPL"), by its attorney, hereby files the following Petition to Join an Indispensable Party and, contemporaneously with filing this Petition to Join an Indispensable Party, PPL has filed, as of this date, an Answer to the Complaint in the above-captioned proceeding, which is incorporated herein as though set forth fully at length.

1.      Petitioner is PPL.
2.      Respondents are:  
          SOPHIA SARANTAKOS  
          1170 AVOY ROAD  
          LAKEVILLE, PA 18438  
  
          SAMANTHA BRISCOE  
          1166 AVOY ROAD  
          LAKEVILLE, PA 18438
3.      Complainant owns a residential rental property located 1166 and 1170 Avoy Road, Lakeville, PA 18438 ("Property").
4.      Complainant has filed a Complaint docketed in the above-captioned

matter alleging that PPL has acted wrongfully in complying with Act 54 by transferring balances to her account after “foreign wiring” was discovered on tenants’ meters inside the residential rental property owned by Complainant.

5. As more fully set forth in PPL’s Answer to Complainant’s Complaint, PPL conducted a foreign wiring investigation at the Property and discovered foreign wiring.

6. As a result of discovering foreign wiring, and in accordance with Act 54, PPL transferred the tenants’ account balances into Complainant’s name.

7. An indispensable party is one whose interest in the subject matter and relief of a proceeding deter the Commission from proceeding without it.

8. The Pennsylvania Supreme Court has held that in determining whether a party is indispensable, the tribunal must determine whether that parties’ interest is essential to the merits of the issue.

9. Here, under Act 54, if the Commission was to determine that there was no foreign load, or a lesser foreign load, on Tenants’ meter, PPL would be required to transfer the disputed balance back to an account in Tenants’ names.

10. Since Tenants’ rights will clearly be affected by the result of this proceeding, it is essential they be made parties to this action.

11. PPL requests that the Commission join the following tenants as indispensable parties to this action:

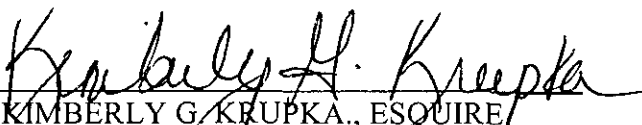
- a. SAMANTHA BRISCOE  
(L/K/A) 1166 AVOY ROAD  
LAKEVILLE, PA 18438

12. In deciding this case, PPL directs the PUC to its Order granting PPL's Motion to Join an Indispensable Party in the case of Afshari v. PPL, C-20055547.

WHEREFORE, in view of the foregoing, PPL respectfully requests that the Pennsylvania Public Utility Commission grant PPL's Petition to Join an Indispensable Party.

Respectfully submitted,

PPL Electric Utilities Corporation

By:   
KIMBERLY G. KRUPKA., ESQUIRE  
*Attorney for Respondent, PPL Electric Utilities Corporation*

Dated: May 3, 2010  
at Allentown, Pennsylvania

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

MAY 3 2010

SOPHIA SARANTAKOS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

COMPLAINT DOCKET

NO. C-2010-2169749

**CERTIFICATE OF SERVICE**


This is to certify that PETITION TO JOIN AN INDISPENSABLE PARTY was mailed to counsel/complainant of record on behalf of Complainant by first class United States mail, postage on this the 3<sup>rd</sup> day of May, 2010.

SOPHIA SARANTAKOS  
1170 AVOY ROAD  
LAKEVILLE, PA 18438

SAMANTHA BRISCOE  
1166 AVOY ROAD  
LAKEVILE, PA 18438

GROSS MCGINLEY, LLP

By:

  
KIMBERLY G. KRUPKA, ESQUIRE, ID #83071  
Counsel for Defendant, PPL Electric Utilities Corporation  
33 South 7<sup>th</sup> Street, P.O. Box 4060  
Allentown, PA 18105  
Phone (610) 820-5450; Fax (610) 820-6006

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SOPHIA SARANTAKOS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2010-2169749

**NOTICE TO PLEAD**

TO: SOPHIA SARANTAKOS  
1170 AVOY ROAD  
LAKEVILLE, PA 18438

SAMANTHA BRISCOE  
1166 AVOY ROAD  
LAKEVILLE, PA 18438

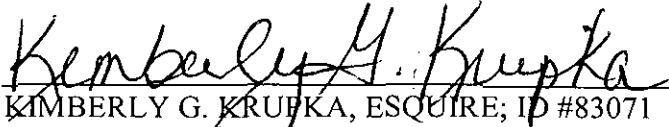
**RECEIVED**

MAY 3 2010

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Pursuant to 52 Pa. Code Section 5.61(a), you are hereby notified that you have twenty (20) days from the date of service of the within Petition to Join an Indispensable Party in which to answer, and that if you fail to so answer within twenty (20) days from the date of service, PPL's Petition to Join an Indispensable Party may be granted without further notice.

GROSS MCGINLEY, LLP

By:   
KIMBERLY G. KRUPKA, ESQUIRE; ID #83071  
Attorney for PPL Electric Utilities Corp.  
33 South 7th Street, P.O. Box 4060  
Allentown, PA 18105-4060  
(610) 820-5450 I

Dated: May 3, 2010  
at Allentown, Pennsylvania