



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Fax
www.postschell.com

Christopher T. Wright
Associate

cwright@postschell.com
717-612-6013 Direct
717-731-1985 Fax
File #: 2507/140074

September 14, 2010

BY HAND

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Tom Harrison v. PPL Electric Utilities Corporation
Docket No. C-2010-2181518

Dear Secretary Chiavetta:

Enclosed is the original Motion to Compel Answers to Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Tom Harrison in the above-referenced proceeding.

As indicated by the certificate of service, a copy of the Motion has been provide to Mr. Harrison in the manner indicated.

Respectfully Submitted,

Christopher T. Wright

CTW/jl

Enclosures

cc: Honorable Kandace F. Melillo (via Hand Delivery)
Certificate of Service

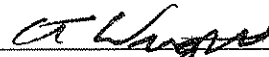
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

Tom Harrison
14 Creekside Drive
Millersville, PA 17551

Date: September 14, 2010



Christopher T. Wright

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Tom Harrison,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2010-2181518
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD


YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU ARE REQUIRED TO ANSWER THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR ANSWER SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL. IF YOU FAIL TO ANSWER THE ENCLOSED MOTION, YOU MAY BE SUBJECT TO SANCTIONS UNDER 52 PA. CODE § 5.372.

Paul E. Russell (ID # 21643)
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18106
Phone: 610-774-4254
Fax: 215-587-1444
E-mail: perussell@pplweb.com

Of Counsel:

Post & Schell, P.C.

Date: September 14, 2010


David B. MacGregor (ID # 28804)
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
Phone: 215-587-1197
Fax: 610-774-6726
E-mail: dmacgregor@postschell.com

John H. Isom (ID # 16569)
Christopher T. Wright (ID # 203412)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: jisom@postschell.com
cwright@postschell.com

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Tom Harrison,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2010-2181518
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY
PPL ELECTRIC UTILITIES CORPORATION ON TOM HARRISION**

TO ADMINISTRATIVE LAW JUDGE KANDACE F. MELILLO:

PPL Electric Utilities Corporation (“PPL Electric”) hereby files, pursuant to 52 Pa. Code § 5.342, this Motion to Compel Answers to its Interrogatories and Requests for Production of Documents on Tom Harrison – Set I (hereinafter “PPL Electric Interrogatories”). In support, PPL Electric states as follows:

1. On June 7, 2010, the Complainant, Tom Harrison, filed with the Pennsylvania Public Utility Commission (“Commission”) a Complaint against PPL Electric.
2. Pursuant to 52 Pa. Code § 5.321(b), a party is entitled to obtain discovery of any matter, not privileged, that is relevant to a pending proceeding, or any matter that is reasonably calculated to lead to discovery of admissible evidence.
3. A party may serve written interrogatories, which may include requests for production of documents, to be answered by the party served. 52 Pa. Code § 5.341.

4. Unless modified by the presiding officer or by agreement of the parties, answers to interrogatories in a formal complaint siting case must be served not more than twenty (20) days after service of the interrogatories. 52 Pa. Code § 5.342(d).

5. Unless modified by the presiding officer or by agreement of the parties, objections to interrogatories must be served within ten (10) days of service of the interrogatories. 52 Pa. Code § 5.342(g).

6. On July 29, 2010, PPL Electric served the PPL Electric Interrogatories.

7. Tom Harrison has not objected to the PPL Electric Interrogatories. The time for objecting has lapsed and no valid objection could now be lodged.

8. Answers to the PPL Electric Interrogatories were originally due on or before August 23, 2010.

9. On August 19, 2010, PPL Electric and Mr. Harrison agreed to extend the discovery response period until August 26, 2010. PPL Electric advised that it would file a motion to compel in the above-captioned matter if the outstanding answers to the PPL Electric Interrogatories were not received on August 26, 2010.

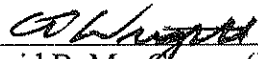
10. To date, Mr. Harrison has not served answers to the PPL Electric Interrogatories.

11. PPL Electric is entitled to receive answers to its Interrogatories under 52 Pa. Code § 5.342.

WHEREFORE, PPL Electric respectfully requests Administrative Law Judge Melillo grant the Motion to Compel and order Tom Harrison to serve answers to the PPL Electric Interrogatories within three (3) days from the date of the order.

Respectfully submitted,

Paul E. Russell (ID # 21643)
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18106
Phone: 610-774-4254
Fax: 215-587-1444
E-mail: perussell@pplweb.com


David B. MacGregor (ID # 28804)
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
Phone: 215-587-1197
Fax: 610-774-6726
E-mail: dmacgregor@postschell.com

Of Counsel:

Post & Schell, P.C.

John H. Isom (ID # 16569)
Christopher T. Wright (ID # 203412)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: jisom@postschell.com
cwright@postschell.com

Date: September 14, 2010

Attorneys for PPL Electric Utilities Corporation