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ATTORNEYS AT LAW

LOREN L. SPEZIALE^o
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www.grossmcginley.com

Please reply to:
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kkrupka@grossmcginley.com

OF COUNSEL
MICHAEL J. PIOUSA

^oAlso admitted in NY
^oAlso admitted in NJ
†Also admitted in DC & MD
^oAlso admitted in MA

August 23, 2011

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P O Box 3265, 400 North St
Harrisburg PA 17105-3265

RECEIVED

AUG 23 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Lorrie Reynolds v PPL Electric Utilities Corporation
Docket No: C-2011-2255268

Dear Ms. Chiavetta:

Enclosed for filing in the above-captioned matter is the original Preliminary Objections of PPL Electric Utilities Corporation.

Pursuant to 52 Pa. Code §1.11, the enclosed document is deemed to be filed on August 23, 2011, and was deposited with an overnight express delivery service as shown on the delivery receipt attached to the mailing envelope.

In addition, please date and time-stamp the enclosed extra copy of this letter and return it to me in the envelope provided.

Very truly yours,


KIMBERLY G. KRUPKA

KGK/ejm
Enclosures

cc: Lorrie Reynolds (w/ enc)
Kimberly A Galligani (w/ enc); *via email*
Karen A. Posten (w/ enc); *via email*

33 South Seventh Street, P.O. Box 4060, Allentown, PA, 18105-4060 Telephone 610/820-5450 Fax 610/820-6006

717 Washington Street, Easton, PA 18042 Telephone 610/258-1506 Fax 610/258-0701

111 East Harrison Street, Suite 2, Emmaus, PA 18049 Telephone 610/967-1030 Fax 610/967-0622

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LORRIE REYNOLDS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2011-2255268

RECEIVED

AUG 23 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

NOTICE TO PLEAD

TO: LORRIE REYNOLDS
562 S THIRD ST
LEMOYNE PA 17053

Pursuant to 52 Pa. Code Section 5.101(d), you are hereby notified that you have ten (10) days from the date of service of the within Preliminary Objections within which to file a written answer with the Secretary of the Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17120, and that if you fail to so file a written answer within ten (10) days from the date of service, Respondent's Preliminary Motion may be granted without further notice.

Respectfully submitted,

PPL Electric Utilities Corporation

BY: 
KIMBERLY G. KRUPKA, ESQUIRE

Dated: August 23, 2011
at Allentown, Pennsylvania

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LORRIE REYNOLDS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2011-2255268

RECEIVED

AUG 23 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PRELIMINARY OBJECTIONS
OF PPL ELECTRIC UTILITIES CORPORATION

PPL Electric Utilities Corporation, ("PPL") by and through its attorneys of record, Gross McGinley, LLP, hereby make the following Preliminary Objections to the Complaint of Lorrie Reynolds, pursuant to 52 Pa. Code §5.101, and in support thereof allege as follows:

1. PPL hereby incorporates those averments set forth in its Answer contemporaneously filed in the above-captioned case as if more fully set forth at length.

2. Complainant, Lorrie Reynolds, filed a Complaint against PPL Electric Utilities Corporation alleging that PPL improperly transferred to Complainant's Account Number 73510-59201, a balance from a prior account after a third party placed said account into Complainant's name by fraudulent means. See Complaint at Paragraphs 4(a) and 4(b), a true and correct copy of which is attached hereto as Exhibit "A".

3. Complaint, Lorrie Reynolds, previously filed a Complaint, at Docket Number F-2009-2113220, advancing the same allegations. A true and correct copy of the Complaint is attached hereto as Exhibit "B".

4. By a Certificate of Satisfaction dated September 2, 2009 and received by the Public Utility Commission on September 4, 2009, the parties settled the Complaint, filed at Docket number F-2009-2113220, thus resolving all issues set forth in the Complaint, filed at Docket number F-2009-2113220, including the transfer of funds from the prior account to Complaint's current account. A true and correct copy of the Certificate of Satisfaction is attached hereto as Exhibit "C."

5. The Court issued an Order on September 15, 2009, closing the case at Docket Number F-2009-2113220. A true and correct copy of the Order of Court is attached hereto as Exhibit "D" and incorporated herein.

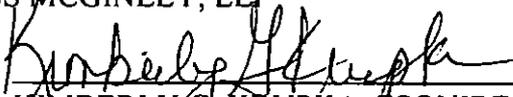
6. As all issues raised in Complainant's Complaint, at Docket Number C-2011-2255268, have been resolved and are subject to a final Order of the Commission, Complainant is precluded from re-litigating the same issues in the above captioned action.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the PUC deny and dismiss Complainant's Complainant with prejudice.

Respectfully submitted, .

GROSS MCGINLEY, LLP

BY:


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

Dated: August 23, 2011
In Allentown, Pennsylvania

RECEIVED

AUG 23 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

EXHIBIT "A"



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

DATE SERVED: August 4, 2011

Field Info Due to OGC: 8.14.11

Answer Due to PUC: 8.24.11

C-2011-2255268

*Billing
Dispute
KGR*

PPL ELECTRIC UTILITIES CORPORATION
PAUL E RUSSELL GEN COUNCEL
TWO N 9TH ST
ALLENTOWN PA 18101-1179

RECEIVED

AUG 04 2011

OFFICE OF
GENERAL COUNSEL

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Lorrie Reynolds. To defend yourself against the claims stated in the complaint, you must respond within twenty (20) days of the above date served by filing with the Commission, in writing, an Answer in accordance with 52 Pa. Code Section 5.61, either personally or through your attorney. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days of the above date served.

IF YOU FAIL TO ANSWER THE COMPLAINT WITHIN TWENTY (20) DAYS OF THE ABOVE DATE SERVED, THE CLAIMS AGAINST YOU MAY BE DEEMED ADMITTED, THE CASE MAY GO FORWARD IN YOUR ABSENCE, AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.



August 4, 2011

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

Very truly yours,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is written in a cursive style with a large initial "R".

Rosemary Chiavetta
Secretary

al

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: August 4, 2011

LORRIE REYNOLDS
Complainant

v.

PPL ELECTRIC UTILITIES CORP
Respondent

Complaint Docket
No: C-2011-2255268

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: PPL ELECTRIC UTILITIES CORP

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265**, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. **The date served is the mailing date appearing at the top of this Notice.** Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

2. If you fail to either satisfy or settle this complaint, or to file an answer or other responsive pleading within twenty (20) days of the date served, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq. If you are a customer of a utility, an order may be entered which prescribes a

payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy or settle this complaint, you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq. If you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq. If you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



Rosemary Chiavetta
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

Please print in ink or type.

1. CUSTOMER (COMPLAINANT) INFORMATION

Your name, mailing address, county, telephone number, utility account number and service address:

Name LORRIE J REYNOLDS

Street/P.O. Box 562 S THIRD ST Apt # A

City LEMOYNE State PA Zip 17043

County CUMBERLAND

Daytime Telephone Number Where We Can Contact You: (717) 214-3864

E-mail Address (optional):

Utility Account Number (from your bill) 73510-59201

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name LORRIE J REYNOLDS

Street/P.O. Box 24 BOYER ST

City ENHAUT State PA Zip 17113

2. FULL NAME OF UTILITY COMPANY (RESPONDENT):

PP&L

3. TYPE OF UTILITY (check one)

[X] ELECTRIC

[] STEAM HEAT

[] GAS

[] WASTE WATER

[] WATER

[] MOTOR CARRIER

(e.g., taxi, moving company, limousine)

[] TELEPHONE (local, long distance)

4. COMPLAINT (check one)

A. In general, what is your complaint?

- I want to oppose the company's proposed rate increase.
- There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.
- Other (explain).

B. State the facts of your complaint.

Include any specific dates, times or places that may be important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

Please see attached copy of letter giving explanation.

5. RELIEF

How do you want your complaint to be resolved? Use additional paper if you need more space.

I want PPA to remove the \$56200 from my account as I don't feel responsible to pay it.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a billing problem, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety or welfare?

YES

NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES (includes appeals of BCS determinations)

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. LEGAL REPRESENTATION (IF ANY)

If you are represented by a lawyer in this matter you must provide your lawyer's name, address, telephone number, and e-mail address, if known.

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

E-mail Address (If Known) _____

9. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification:

I Lorrie J Reynolds, hereby state that the facts above set forth are true and correct (or 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).

Lorrie J Reynolds (Signature) 7/27/2011 (Date)

Title of authorized employee or officer

10. FILING

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
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Facsimiles and/or electronic filings of the complaint will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your complaint for your records.

April 18, 2011

Public Utility Commission

P.O. Box 3265

Harrisburg, PA 17105-3265

To Whom It May Concern:

I lived at 24 Boyer Service, Enhaut, PA from July 2003 through December of 2004 with the owner of the residence, Lisa Leininger. During this period of time, she apparently put her PP&L service in my name without my knowledge. I wasn't aware of the situation until I moved to 5074 Pajabon Drive, Harrisburg, PA in November 2006 after receiving my first PP&L bill for the month of December when the additional charges were added to the bill in the amount of \$562.00.

I filed a dispute with PP&L but was not able to prove fraud due to the fact that I had not filed a police report. After finding out about the fraud, which was two years later, I did call the Steelton Police Department and was advised as the incident had happened several years prior, there would be no need to file the report. Since I couldn't prove the fraud to PP&L they still now are holding me responsible for the charges which I do not feel I should pay.

I have provided the letter I received from PP&L regarding the disputed incident which I received on April 8, 2011. I would like this incident investigated and a resolution in my favor. If you have any questions I can be reached at the following telephone numbers: 717.214.3864 (work) and 717.412.7199 (home).

Thank you.

Lorrie J. Reynolds

562 South Third Street, Apt. A

Lemoyne, PA 17043

RECEIVED

AUG 23 2011

EXHIBIT "B"

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

*Billing
Dispute
UK6K1*

✓ **DATE SERVED: June 15, 2009**
Filed Due: June 25, 2009
Answer Due: July 5, 2009

F-2009-2113220
RECEIVED

PPL ELECTRIC UTILITIES CORPORATION
PAUL E RUSSELL GEN COUNSEL
TWO N 9TH ST
ALLENTOWN PA 18101-1179

JUN 16 2009
OFFICE OF
GENERAL COUNSEL

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Lorrie J. Reynolds. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.



June 15, 2009

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

Very truly yours,



James J. McNulty
Secretary

lam

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: June 15, 2009

LORRIE J. REYNOLDS
Complainant

v.

PPL ELECTRIC UTILITIES CORPORATION
Respondent

Complaint Docket
No: **F-2009-2113220**

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: PPL ELECTRIC UTILITIES CORPORATION

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265**, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

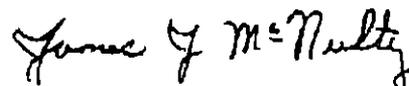
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if

you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

F-2009-211322D

Please print or type.

COPY

1. CUSTOMER NAME (COMPLAINANT)

Your name, mailing address, county, telephone number, utility account number and service address:

Name Lorrie J. Reynolds
Street/P.O. Box 5074 Pajabon Drive Apt # 311
City Harrisburg State PA Zip 17111
County Dauphin
Area Code/HOME Phone (717) 920-9239
Area Code/WORK Phone (717) 214-3869
Utility Account Number 7351059201
(from your bill)

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name Lorrie J. Reynolds, resident of address below
Street/P.O. Box 24 Boyer Street
City Enhaut State PA Zip 17113

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: PP+L

3. TYPE OF UTILITY (check one)

- ELECTRIC
- GAS
- WATER
- TELEPHONE
(local, long distance)
- STEAM HEAT
- WASTE WATER
- MOTOR CARRIER
(taxi, moving company, limousine)

RECEIVED
2009 JUN 10 AM 8:26
SECRETARY'S BUREAU

4. **COMPLAINT** (check one)

A. **In general, what is your complaint?**

- I want to oppose the company's proposed rate increase.
- There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.
- Other.
(explain)

B. **State the facts of your complaint.**

Include any specific dates, times or places that are important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

see attached

5. **RELIEF**

What do you want the Public Utility Commission to do about your complaint? Use additional paper if you need more space.

I want the charges incurred removed or credited from my bill.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution company, an electric distribution company or a water company AND your complaint is about a billing problem, an application for service problem, a termination of service problem or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety?

YES

NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES
(includes appeals of BCS determinations)

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification: Lorrie J. Reynolds, hereby state that the facts above set forth are true and correct (or 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).

Lorrie J. Reynolds
(Signature)

5/27/09
(Date)

9. LEGAL REPRESENTATION (IF ANY)

If you are represented by a lawyer in this matter you must provide your lawyer's name, address and telephone number.

Lawyer's Name NA

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

10. FILING

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission, P.O. Box 3265 Harrisburg, PA 17105	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
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Facsimiles and/or electronic filings of the complaint form will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your complaint for your records.

FACTS OF THIS COMPLAINT

I resided at 24 Boyer Street, Enhaut from July 2003 to December of 2004. I lived there with the owner of the property, Lisa Linninger. The financial agreement we had was that I pay her rent, the cable bill and part of the telephone bill. I didn't have to contribute anything towards the heat or electric. There also was no legal and binding lease agreement.

I am only to assume that the owner fraudulently placed the electric service in my name during this time frame. How she acquired my personal information is unknown to me (SS#). I was only made aware of this outstanding bill with PP&L when I moved into my new apartment at Aspen Hill Apartments in November of 2006 and had electric service started there.

Due to these facts I feel I am not responsible for the charges incurred of \$657.37 as I had no knowledge the account was put in my name by her.

On another note, the completed fraud packet was mailed to PP&L as they requested. The only information that was not included was a police report. I contacted the local police department and they were of no help. They indicated since the incident was too far in the past they could essentially do nothing to help me nor would it be necessary to have a police report completed.

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AUG 23 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

EXHIBIT "C"

MALCOLM J. GROSS
PAUL A. MCGINLEY
HOWARD S. STEVENS
DONALD LaBARRE, JR.
J. JACKSON EATON, III
MICHAEL A. HENRY
PATRICK J. REILLY
ANNE K. MANLEY
SUSAN ELLIS WILD
VICTOR F. CAVACINI
THOMAS E. REILLY, JR.
ROBERT A. ALPERT
ALLEN I. TULLAR
RAYMOND J. DeRAYMOND
THOMAS A. CAPEHART
JOHN F. GROSS
KIMBERLY G. KRUPKA
KIMBERLY A. SPOTTS-KIMMEL

GROSS 
McGINLEY LLP
ATTORNEYS AT LAW

www.grossmcginley.com

Please reply to:
Allentown Office
Kimberly G. Krupka
kkrupka@grossmcginley.com

ERROL C. DEANS, JR. *
ANDREW H. RALSTON, JR.
KELLY RUSH SULLIVAN *
PETER J. DRUCKENMILLER, JR.
MICHAEL J. BLUM **
SAMUEL E. COHEN*
CATHERINE L. KOLLETO

OF COUNSEL
DAVID C. KEEHN
MICHAEL J. PIOISA

*Also admitted in NY
*Also admitted in NJ
†Also admitted in DC & MD
*Also admitted in MA
*Also admitted in CT

September 2, 2009

Mr. James J. McNulty
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Post Office Box 3265, 400 North Street
Harrisburg, PA 17105-3265

COPY

RECEIVED
2009 SEP -4 AM 9:01
PA P.U.C. BUREAU
SECRETARY'S

RE: Lorrie J. Reynolds v. PPL Electric Utilities Corporation
No: F-2009-2113220

Dear Mr. McNulty:

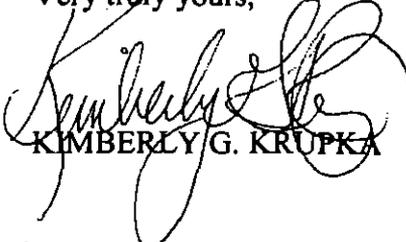
Enclosed for filing in the above-captioned matter are an original and three (3) copies of a Certificate of Satisfaction of Complaint under 52 Pa. Code § 5.24(b).

Because all legal and factual issues in this proceeding have been resolved, PPL respectfully requests that this docket be terminated.

I hereby certify that I have provided a copy of the Certificate to the Complainant in this proceeding.

In addition, please date and time-stamp the enclosed extra copy of this letter and return it to me in the envelope provided.

Very truly yours,


KIMBERLY G. KRUPKA

KGK/ejm
Enclosure

cc: Ms. Heather Schleicher (w/enclosure)
Ms. Lorrie J. Reynolds (w/enclosure)
W:\WDOX\CLIENTS\ppl-puc\billing\00283526.DOC



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LORRIE J. REYNOLDS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET
NO. F-2009-2113220

CERTIFICATE OF SATISFACTION OF COMPLAINT

1. Complainant is Lorrie J. Reynolds.
2. Respondent is PPL Electric Utilities Corporation (hereafter referred to as "PPL").

3. This Certificate of Satisfaction of Complaint is submitted pursuant to 52 Pa. Code § 5.24(b).

4. PPL hereby certifies that the parties to the above-referenced formal Complaint, now pending before the Pennsylvania Public Utility Commission (hereafter "Commission"), have mutually and voluntarily agreed upon the following terms as full satisfaction of all outstanding legal and factual disputes in this proceeding, and Complainant has acknowledged satisfaction to PPL:

(a) Complainant, Lorrie Reynolds, and Respondent, PPL, agree that Complainant will pay her regularly monthly bill on or before September 4, 2009. Thereafter beginning with the bill due October 2009, Complainant will pay her monthly

bill plus \$49 per month towards arrearages until all arrearages are paid in full. So long as all payments are timely made, PPL will not charge any late payment fees or interest.

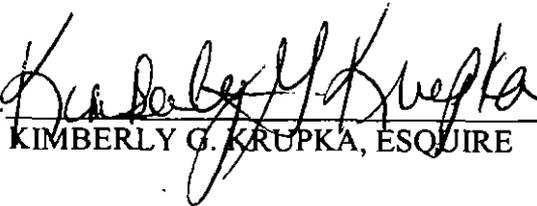
(b) Complainant withdraws her Complaint with prejudice.

5. Respondent, PPL hereby notifies Complainant of the filing of this Certificate of Satisfaction, and that if Complainant objects or disagrees with the terms of the Certificate of Satisfaction, Complainant must notify the Commission in writing of his objection and/or disagreement within ten (10) days of the date this Certificate of Satisfaction was signed and served, or the terms of the Certificate of Satisfaction will become final and binding.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the docket be marked closed in this matter.

Respectfully submitted,

PPL Electric Utilities Corporation

By: 
KIMBERLY G. KRUPKA, ESQUIRE

Dated: September 2, 2009
at Allentown, Pennsylvania

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LORRIE J. REYNOLDS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

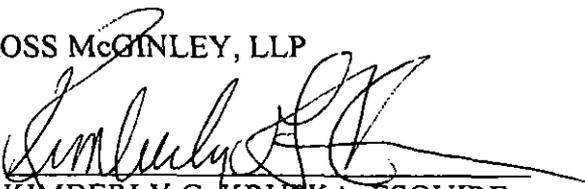
COMPLAINT DOCKET
NO. F-2009-2113220

CERTIFICATE OF SERVICE

This is to certify that THE CERTIFICATE OF SATISFACTION of PPL ELECTRIC UTILITIES CORPORATION TO THE COMPLAINT OF LORRIE J. REYNOLDS, was mailed to counsel/complainant of record on behalf of Complainant by first class United States mail, postage on this the 2nd day of September, 2009.

LORRIE J. REYNOLDS
5074 PAJABON DRIVE, APT. 311
HARRISBURG, PA 17111

GROSS MCGINLEY, LLP

By: 

KIMBERLY G. KRUPKA, ESQUIRE
I.D. # 83071

Counsel for Respondent

PPL Electric Utilities Corporation

33 South 7th Street, P.O. Box 4060

Allentown, PA 18105

Phone (610) 820-5450; Fax (610) 820-6006

RECEIVED

AUG 23 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

EXHIBIT "D"



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

September 15, 2009

F-2009-2113220

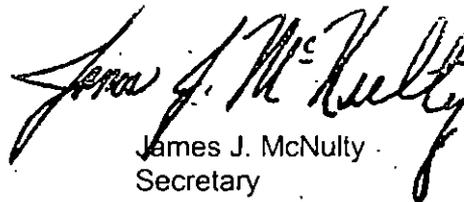
KIMBERLY G GRUPKA
33 SOUTH SEVENTH STREET
PO BOX 4060
ALLENTOWN PA 18105-4060

Lorrie J Reynolds
v.
PP&L

TO WHOM IT MAY CONCERN:

Please be advised that the Commission has marked the above-entitled proceeding closed.

Very truly yours,



James J. McNulty
Secretary

cc: All parties of Record
ALJ

RLJ



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LORRIE REYNOLDS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2011-2255268

RECEIVED

AUG 23 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

This is to certify that the Preliminary Objections on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record, LORRIE REYNOLDS, on behalf of Complainant by first class United States mail, postage on this the 23rd day of August 2011:

LORRIE REYNOLDS
562 S THIRD ST
LEMOYNE PA 17053

GROSS MCGINLEY, LLP

By: 
KIMBERLY G. KRUPKA, ESQUIRE
I.D. # 83071
Attorney for Respondent
PPL Electric Utilities Corporation
33 South 7th Street, P.O. Box 4060
Allentown, PA 18105
Phone (610) 820-5450; Fax (610) 820-6006

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