

# THADDEUS T. D'AMBROSIA

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2736 MASSACHUSETTS COURT  
HARRISBURG, PA 17112-9176

September 30, 2011

VIA ELECTRONIC FILING

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

**RE: Motion For Extension of Time For Discovery & Continuance of Hearing Date  
Thaddeus T. D'Ambrosia v. PPL Utilities Corporation  
Docket No. F-2010-2181822**

Dear Secretary Chiavetta:

Please consider this letter as my Motion For Extension of Time For Discovery and Continuance of Hearing Date in the above-captioned matter. The extension and continuance are being requested to allow for additional time for discovery of information contained in documents that have been released by PPL to me only in the past week.

Judge Kandace Melillo held a discovery conference call on Wednesday, September 21, 2011 to discuss the status of documents, which I have been requesting from PPL since 2010, and which Judge Melillo previously ordered PPL to provide. During our conference call, PPL indicated that the documents were not available and could not be provided.

The documents were, in truth, readily available and released to me at 5:00 p.m. on Friday, September 23rd, after I rejected PPL's settlement offer made earlier that same afternoon.

The documents reveal that no less than six individuals employed by PPL were involved in the cancellation of the payment agreement at issue; all of these individuals are potential witnesses at the hearing.

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Moreover, the documents also contain information which is reasonably calculated to lead to admissible evidence that the premature cancellation of payment agreements made by PPL is common to other PPL ratepayers who had/have payment arrangements with PPL Utilities Corporation.

PPL has objected to my request to identify the affected ratepayers; however, PPL has indicated that if ordered to do so by the Public Utility Commission, PPL will identify those ratepayers who, in the past four years, have had their payment arrangements prematurely cancelled because of "system error" and "human error." PPL has also stated that they will identify the affected ratepayers, provided that Complainant pre-pay the costs associated with having staff manually review the accounts of each ratepayer of record of PPL to determine the information requested.

Finally, much of the discovery that I have requested relating to the documents released on September 23rd has not been provided to me; text and pagination have been redacted on others.

For the foregoing reasons, I respectfully request that you approve my motion.

Sincerely,

/s/

Thaddeus T. D'Ambrosia

**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 FIRST CLASS MAIL**

The Honorable Kandace Melillo  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
P. O. Box 3265  
Harrisburg, PA17105-3265

Kimberly J. Krupka, Esquire  
Gross McGinley LLP  
33 South Seventh Street  
P. O. Box 4060  
Allentown, PA 18105-4060  
(Attorney For PPL Utilities Corporation)

Date: September 30, 2011

/s/

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Thaddeus T. D'Ambrosia