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November 7, 2011

VIA FEDERAL EXPRESS

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

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NOV -7 2011

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

**RE: Robbin Bass v PPL Electric Utilities Corporation
No. F-2010-2205686**

Dear Ms. Chiavetta:

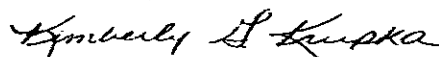
Enclosed for filing in the above-captioned matter are an original and nine (9) copies of the Reply of PPL Electric Utilities Corporation to Complainant, Robbin Bass', Exceptions, along with the attached Certificate of Service.

Pursuant to 52 Pa. Code §1.11, the enclosed document is to be deemed filed on or before November 7, 2011.

I am also enclosing an extra copy of PPL's Reply. Please time-stamp this copy and return it to my office in the envelope provided.

Thank you for your cooperation in this matter.

Very truly yours,



KIMBERLY G. KRUPKA

KGK/dm

Enclosures

cc: Robbin Bass (w/ enclosure)
The Honorable Ember S. Jandebour (w/enclosure-via FedEx)
Ms. Kimberly A Galligani (w/ encl); *via email only*

00416753.DOCX

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROBBIN BASS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. F-2010-2205686

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**REPLIES OF PPL ELECTRIC UTILITIES CORPORATION TO THE EXCEPTIONS
OF COMPLAINANT, ROBBIN BASS**

AND NOW COME PPL Electric Utilities Corporation ("PPL") by and through its counsel, Gross McGinley, LLP, files the following Reply to the Complainant's Exceptions, and in support thereof, responds as follows:

1. Complainant excepts, in general, to the Decision of Administrative Law Judge Ember S. Jandebour. Complainant does not except to a specific finding of fact or conclusion of law, but reiterates Complainant's position that she has not used the electric for which she was billed for the period of July 1, 2010 through October 29, 2010. Respondent, PPL, asserts that the record is clear that the customer of record/ratepayer had the ability to use the electric for which she was billed and had a meter which was working accurately.

2. Administrative Law Judge Ember S. Jandebour correctly found that Complainant, Robbin Bass, failed to establish a prima facie case of high bill. Although Complainant has established that the number of inhabitants has not changed and there were no prior billing abnormalities, she was unable to establish that she could not have used the amount of electricity for which she was charged. Alternatively, in the event the Commission should find that a prima

facie case was established, Respondent, PPL, met its burden in proving that Complainant had the ability to utilize the electricity for which she was billed and had an electric meter which was functioning well within the PUC regulations. More specifically, PPL's representative, Ms. Koch, performed a high bill in-person investigation at Complainant's home on September 27, 2010. At that time, based upon the items within Complainant's home, it was determined that Ms. Bass had the ability to utilize 2,039 kwh per month (Hearing Transcript at Page 46, PPL Exhibit No. 6). The potential usage for Ms. Bass' home exceeded her actual usage. Moreover, PPL performed a test of the meter which showed an accuracy within PUC regulations. (Hearing Transcript at Page 48, PPL Hearing Exhibit No. 3). Accordingly, PPL found that Complainant both had the ability to utilize the kilowatts for which she was billed and had a meter which was testing accurate.

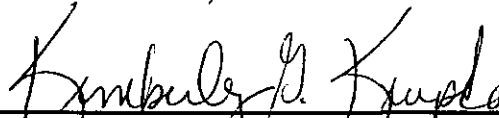
3. Moreover, as Complainant had indicated that she was concerned about individuals placing items within her home which utilized electric, PPL performed a foreign 'wiring investigation. During the September 27, 2010 visit, Ms. Koch, the representative of PPL, determined that there was nothing to indicate any foreign load, meter tampering or any other abnormal electrical usage within the home. (Hearing Transcript at Pages 44 – 45, 52; PPL Hearing Exhibit No. 5). This is consistent with Complainant's own electrician whom she hired to investigate a potential foreign load and found nothing to indicate foreign load. (Hearing Transcript at Pages 23-24). Accordingly, both the Complainant and PPL were able to rule out the possibility of foreign wiring.

4. Accordingly, even if the Commission should find that Complainant has established a prima facie case, Respondent, PPL, has presented more than sufficient evidence to rebut such case. Unfortunately, no utility can go back in time to determine the actual happenings

within a household during the month the electric usage is being challenged. A utility may perform a high bill investigation only after the Complaint is brought to the attention of the utility. At that time, PPL was able to enter the premises and establish that Complainant had the ability to utilize the kilowatts for which she was billed. Moreover, PPL was able to test the meter and determine that it was working accurately. Finally, PPL was able to rule out any issues of foreign wiring or meter tampering. Accordingly, PPL has met any burden.

Respectfully submitted,

GROSS MCGINLEY, LLP

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

Dated November 7, 2011
In Allentown, Pennsylvania

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROBBIN BASS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. F-2010-2205686

CERTIFICATE OF SERVICE

This is to certify that the REPLIES OF PPL ELECTRIC UTILITIES CORPORATION TO THE EXCEPTIONS OF COMPLAINANT, ROBBIN BASS, was mailed to counsel/complainant of record on behalf of Complainant by first class United States mail, postage on this the 7th day of November 2011.

ROBBIN BASS
521 W GREEN ST
ALLENTOWN PA 18102

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NOV -7 2011

VIA FEDERAL EXPRESS

Administrative Law Judge Ember S. Jandebour
Room 317 Scranton State Office Building
100 Lackawanna Avenue
Scranton PA 18503

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

GROSS MCGINLEY, LLP

By: 

KIMBERLY G. KRUPKA, ESQUIRE

I.D. # 83071

Counsel for Defendant, PPL Electric Utilities
Corporation

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

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ALLENTOWN, PA 18105



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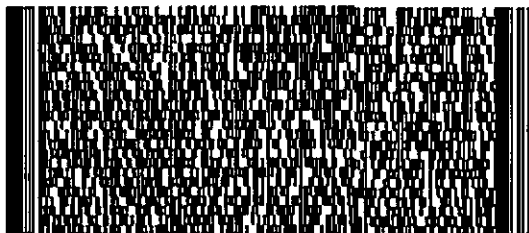
Rosemary Chiavetta, Secretary
PENNSYLVANIA PUBLIC UTILITY COMMISS
400 NORTH ST
COMMONWEALTH KEYSTONE BUILDING
HARRISBURG, PA 17120

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