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RAYMOND J. DeRAYMOND
THOMAS A. CAPEHART
KIMBERLY G. KRUPKA
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ANDREW H. RALSTON, JR.

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McGINLEY
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www.grossmcginley.com

Please reply to:
Allentown Office

Kimberly G. Krupka
kkrupka@grossmcginley.com

LOREN L. SPEZIALE*
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OF COUNSEL
MICHAEL J. PIOSA

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

November 7, 2011

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NOV -7 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA FEDERAL EXPRESS

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**RE: Thaddeus D'Ambrosia v. PPL Electric Utilities Corporation
No. F-2010-2181822**

Dear Ms. Chiavetta:

Enclosed herewith please find PPL'S Answer to the Motion to Compel which is being filed by Federal Express today.

Please time-stamp the extra copy of the enclosed letter and return to me in the self-addressed stamped envelope.

Very truly yours,



KIMBERLY G. KRUPKA

KGK/dm

Enclosure

cc: Thaddeus D'Ambrosia (w/enclosure)
Administrative Law Judge Kandace F. Melillo (w/enclosure)

00416567.DOCX

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

NOV -7 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Thaddeus D'Ambrosia, Complainant

:
:
:
:
:

v.

F-2010-2181822

PPL Electric Utilities Corporation, Respondent

**ANSWER OF PPL ELECTRIC UTILITIES TO COMPLAINT'S MOTION TO COMPEL
ANSWERS TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS**

AND NOW COMES the Respondent, PPL Electric Utilities (hereinafter "PPL) by and through its counsel, Gross McGinley, LLP, files the following Answer to Complainant's Motion to Compel and in Support thereof avers as follows:

1. Admitted that Complainant filed a Complaint with the Public Utility Commission dated June 9, 2010. Denied that the PUC served such Complaint on PPL on June 9, 2010.

2. The allegations of this Paragraph are a conclusion of law to which no response is required. Nonetheless, PPL does not deny that Complainant is entitled to proposed discovery in accordance with the provision of the Pennsylvania Code.

3. The allegations of this Paragraph are a conclusion of law to which no response is required. Nonetheless, PPL does not deny that Complainant is entitled to proposed discovery in accordance with the provision of the Pennsylvania Code.

4. The allegations of this Paragraph are a conclusion of law to which no response is required. Nonetheless, PPL does not deny that Complainant is entitled to proposed discovery in accordance with the provision of the Pennsylvania Code.

6. Admitted in part, denied in part. Admitted that Complainant sent informal discovery requests via e-mail questions to Respondent on various dates, including requests including the same questions on several dates.

7. Denied that PPL has not provided responses or objections. By way of further response, Complainant issued his “interrogatories and document requests” through various e-mails, and some of which were questions seeking interpretations of documents produced. Respondent provided responses and objections via e-mails dated September 23, 26, 27, October 3, and November 3. (Copies of electronic communications with responses, but not attachments, are attached hereto as Exhibit “A”).

8. Complainant issued his “interrogatories and document requests” through various e-mails, and some of which were questions seeking interpretations of documents produced. Respondent provided responses via e-mails dated September 23, 26, 27, October 3, and November 3. (Copies of electronic communications with responses, but not attachments, are attached hereto as Exhibit “A”).

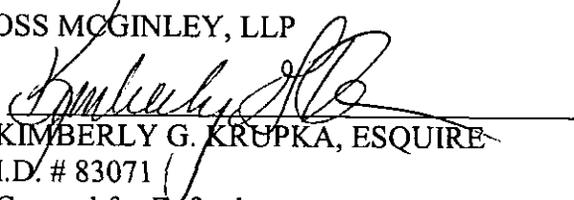
9. Complainant issued his “interrogatories and document requests” through various e-mails, and some of which were questions seeking interpretations of documents produced. Moreover, many of the interrogatories included within the October 10, 2011 request were repetitive of prior interrogatories/requests to which Answers were provided. Respondent provided responses via e-mails dated September 23, 26, 27, October 3, and November 3. (Copies of electronic communications with responses, but not attachments, are attached hereto as Exhibit “A”).

10. Respondent alleges that the November 3, 2011 correspondence to Complainant is a comprehensive Answer to all discovery, and in some instances incorporates prior answers already provided. By way of further response, on September 23, 2011 Complainant sought the identity and titles of six (6) PPL employees and Respondent provided responses on September 27, 2011.

Recently, Complainant has inquired of Respondent any intent to subpoena the same so that PPL could make subpoenaed witnesses available fro the hearing. No request has yet been received.

Respectfully submitted,

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

Allentown, PA 18105

Phone (610) 820-5450

Fax (610) 820-6006

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

EXHIBIT "A"

Kimberly Krupka

From: Kimberly Krupka
Sent: Friday, September 23, 2011 5:00 PM
To: 'Thaddeus T. D'Ambrosia'
Subject: Discovery
Attachments: DOC092311-09232011165445.pdf

Dear Mr. D'Amrbosia,

Currently PPL is compiling the documents requested. However, as the hearing is approaching shortly, attached please find the e-mails we were able to obtain. Although I do not believe these are responsive to the requests of June 2011, I believe they may be responsive to the broader requests of September. In addition, Danielle's last name is Yurcho. The remaining of PPL's discovery responses will be forthcoming.

Kimberly Krupka

Kimberly Krupka

From: Kimberly Krupka
Sent: Monday, September 26, 2011 11:44 AM
To: 'Thaddeus T. D'Ambrosia'
Subject: Additional Documents
Attachments: DOC092611-09262011113728.pdf; DOC092611-09262011113748.pdf;
DOC092611-09262011113754.pdf

Mr. D'Ambrosia,

Attached please find additional documents responsive to your discovery requests of September 21, 2011. While we would normally produce documents all in one response, as the hearing date is approaching, I am providing documents upon receipt so that they can be provided in a timely manner. Upon receipt of additional responsive documents, I will forward the same to you.

Kimberly Krupka

Kimberly Krupka

From: Kimberly Krupka
Sent: Tuesday, September 27, 2011 11:35 AM
To: 'Thaddeus T. D'Ambrosia'
Subject: RE: Additional Documents

Mr. D'Ambrosia,

In response to Interrogatory Number 5, the meter number for that time period was 83512125.

In response to Interrogatory Number 6, please see the follow designations:

- a) Michelle Lawall-Schmidt - Project Manager, Revenue Assurance, PPL Electric Utilities
- b) Deborah Thiel - Customer Contact Supervisor, PPL Electric Utilities
- c) Anthony Osmanski - Supervising Engineer, Metering Support, Large Power, PPL Electric Utilities
- d) Richard Hoffman - Lead Business Systems Analyst, IT-Business Solutions, PPL Electric Utilities
- e) Susan Pellock - Analyst, Metering Support & Large Power, PPL Electric Utilities
- f) Cheryl Mohr - Steno/Clerk, Customer Contact Center, PPL Electric Utilities.

With regard to your requests 1-4, PPL hereby objects to the same as such requested documents (a) are not reasonably expected to lead to the discovery of admissible evidence, (b) as records concerning the accounts of other ratepayers, even with account numbers redacted, are confidential and cannot be produced without violation of the privacy rights of other ratepayers, and (c) as such information is not available to PPL without a manual review of the account of each ratepayer of record of PPL. As PPL does not have a computer program that would permit it to perform an electronic search to provide a response to Interrogatories 1-4, such request is unduly burdensome. In the alternative, should such request be ordered, such Order shall provide that Complainant pre-pay the costs associated with having staff review the records of each ratepayer to determine the information requested.

Kimberly Krupka

From: Thaddeus T. D'Ambrosia [<mailto:tdambrosia@comcast.net>]
Sent: Monday, September 26, 2011 6:09 PM
To: Kimberly Krupka
Subject: Re: Additional Documents

Thank you. Here are some additional requests:

1. What is the number of times in the past four years that PPL customers have had their billing payment arrangements marked kept because of "human error?"
2. Please identify all PPL customers (by redacted account number) who, in the past four years have had their billing payment arrangements marked kept because of "human error."
3. What is the number of times in the past four years that PPL customers have had their billing payment arrangements marked kept because of "system error?"
4. Please identify all PPL customers (by redacted account number) who, in the past four years have had their billing payment arrangements marked kept because of "system error."
5. What is the meter number of the PPL meter that was attached to my house for the period of August 16, 2006 through June 1, 2007?

6. What are the job titles of PPL employees Michelle Lawall-Schmidt, Deborah Thiel, Anthony Osmansky, Richard Hoffman, Susan Pellock, and Cheryl Mohr?

Thaddeus T. D'Ambrosia
2736 Massachusetts Court
Harrisburg, PA 17112
717-350-9227

From: "Kimberly Krupka" <KKrupka@grossmcginley.com>
To: "Thaddeus T. D'Ambrosia" <tdambrosia@comcast.net>
Sent: Monday, September 26, 2011 11:44:01 AM
Subject: Additional Documents

Mr. D'Ambrosia,

Attached please find additional documents responsive to your discovery requests of September 21, 2011. While we would normally produce documents all in one response, as the hearing date is approaching, I am providing documents upon receipt so that they can be provided in a timely manner. Upon receipt of additional responsive documents, I will forward the same to you.

Kimberly Krupka

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Kimberly Krupka

From: Kimberly Krupka
Sent: Wednesday, September 28, 2011 8:31 AM
To: 'Thaddeus T. D'Ambrosia'
Subject: RE: Additional Documents

I am not certain what you mean as stopped meter records "containers". PPL maintains electronic account records. I would need to speak with an IT person, but believe a software program would have to be written to search for key words, etc.

From: Thaddeus T. D'Ambrosia [mailto:tdambrosia@comcast.net]
Sent: Wednesday, September 28, 2011 8:28 AM
To: Kimberly Krupka
Subject: Re: Additional Documents

If ordered, What is the cost to me to search the stopped meter records containers only for requests 1-4?

Thaddeus T. D'Ambrosia
2736 Massachusetts Court
Harrisburg, PA 17112

From: "Kimberly Krupka" <KKrupka@grossmcginley.com>
To: "Thaddeus T. D'Ambrosia" <tdambrosia@comcast.net>
Sent: Tuesday, September 27, 2011 11:35:14 AM
Subject: RE: Additional Documents

Mr. D'Ambrosia,

In response to Interrogatory Number 5, the meter number for that time period was 83512125.

In response to Interrogatory Number 6, please see the follow designations:

- a) Michelle Lawall-Schmidt - Project Manager, Revenue Assurance, PPL Electric Utilities
- b) Deborah Thiel - Customer Contact Supervisor, PPL Electric Utilities
- c) Anthony Osmanski - Supervising Engineer, Metering Support, Large Power, PPL Electric Utilities
- d) Richard Hoffman - Lead Business Systems Analyst, IT-Business Solutions, PPL Electric Utilities
- e) Susan Pellock - Analyst, Metering Support & Large Power, PPL Electric Utilities
- f) Cheryl Mohr - Steno/Clerk, Customer Contact Center, PPL Electric Utilities.

With regard to your requests 1-4, PPL hereby objects to the same as such requested documents (a) are not reasonably expected to lead to the discovery of admissible evidence, (b) as records concerning the accounts of other ratepayers, even with account numbers redacted, are confidential and cannot be produced without violation of the privacy rights of other ratepayers, and (c) as such information is not available to PPL without a manual review of the account of each ratepayer of record of PPL. As PPL does not have a computer program that would permit it to perform an electronic search to provide a response to Interrogatories 1-4, such request is unduly burdensome. In the alternative, should such request be ordered, such Order shall provide that Complainant pre-pay the costs associated with having staff review the records of each ratepayer to determine the information requested.

Kimberly Krupka

From: Thaddeus T. D'Ambrosia [mailto:tdambrosia@comcast.net]
Sent: Monday, September 26, 2011 6:09 PM
To: Kimberly Krupka
Subject: Re: Additional Documents

Thank you. Here are some additional requests:

1. What is the number of times in the past four years that PPL customers have had their billing payment arrangements marked kept because of " human error?"
2. Please identify all PPL customers (by redacted account number) who, in the past four years have had their billing payment arrangements marked kept because of "human error."
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4. Please identify all PPL customers (by redacted account number) who, in the past four years have had their billing payment arrangements marked kept because of "system error."
5. What is the meter number of the PPL meter that was attached to my house for the period of August 16, 2006 through June 1, 2007?
6. What are the job titles of PPL employees Michelle Lawall-Schmidt, Deborah Thiel, Anthony Osmansky, Richard Hoffman, Susan Pellock, and Cheryl Mohr?

Thaddeus T. D'Ambrosia
2736 Massachusetts Court
Harrisburg, PA 17112
717-350-9227

From: "Kimberly Krupka" <KKrupka@grossmcginley.com>
To: "Thaddeus T. D'Ambrosia" <tdambrosia@comcast.net>
Sent: Monday, September 26, 2011 11:44:01 AM
Subject: Additional Documents

Mr. D'Ambrosia,

Attached please find additional documents responsive to your discovery requests of September 21, 2011. While we would normally produce documents all in one response, as the hearing date is approaching, I am providing documents upon receipt so that they can be provided in a timely manner. Upon receipt of additional responsive documents, I will forward the same to you.

Kimberly Krupka

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Kimberly Krupka

From: Kimberly Krupka
Sent: Monday, October 03, 2011 10:01 AM
To: 'Thaddeus T. D'Ambrosia'
Subject: RE: Additional Documents

Mr. D'Ambrosia,

I believe the document you are referencing is the Payment Agreement History for your account. PPL maintains a history of the payment arrangements made on an account, and the current status of each arrangement. As the Attorney, it would be improper for me to interpret documents for you. As you requested on September 21, I provided you with a list of all payment arrangements made on your account during the past four years and the status of each.

Kimberly Krupka

From: Thaddeus T. D'Ambrosia [<mailto:tdambrosia@comcast.net>]
Sent: Friday, September 30, 2011 3:02 PM
To: Kimberly Krupka
Subject: Re: Additional Documents

Ms. Krupka,

The screenprint of Document #092611-0926011113748 indicates that the horizontal scroll bar is active; therefore, more data/information is available for viewing. The vertical scroll bar is not active. Please provide full disclosure of all of the information available. Also,

Also, please provide a detailed description of the function of the undelete button.

Thaddeus T. D'Ambrosia
2736 Massachusetts Court
Harrisburg, PA 17112

From: "Kimberly Krupka" <KKrupka@grossmcginley.com>
To: "Thaddeus T. D'Ambrosia" <tdambrosia@comcast.net>
Sent: Monday, September 26, 2011 11:44:01 AM
Subject: Additional Documents

Mr. D'Ambrosia,

Attached please find additional documents responsive to your discovery requests of September 21, 2011. While we would normally produce documents all in one response, as the hearing date is approaching, I am providing documents upon receipt so that they can be provided in a timely manner. Upon receipt of additional responsive documents, I will forward the same to you.

Kimberly Krupka

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Kimberly Krupka

From: Kimberly Krupka
Sent: Monday, October 03, 2011 10:12 AM
To: 'Thaddeus T. D'Ambrosia'
Subject: RE: Additional Documents

Mr. D'Ambrosia -

PPL has produced several electronic records. Please identify which electronic record you refer to in your e-mail below. The most efficient way may be to attached a scanned copy of the record to which you refer.

Kimberly Krupka

From: Thaddeus T. D'Ambrosia [mailto:tdambrosia@comcast.net]
Sent: Sunday, October 02, 2011 9:01 AM
To: Kimberly Krupka
Subject: Re: Additional Documents

Also:

1. Please identify the PPL employee who searched for and created the screen print showing the electronic record for Account #59033-33376.
2. On what date was the screen print made?

Thanks.

Thaddeus T. D'Ambrosia
2736 Massachusetts Court
Harrisburg, PA 17112

From: "Kimberly Krupka" <KKrupka@grossmginley.com>
To: "Thaddeus T. D'Ambrosia" <tdambrosia@comcast.net>
Sent: Wednesday, September 28, 2011 8:30:55 AM
Subject: RE: Additional Documents

I am not certain what you mean as stopped meter records "containers". PPL maintains electronic account records. I would need to speak with an IT person, but believe a software program would have to be written to search for key words, etc.

From: Thaddeus T. D'Ambrosia [mailto:tdambrosia@comcast.net]
Sent: Wednesday, September 28, 2011 8:28 AM
To: Kimberly Krupka
Subject: Re: Additional Documents

If ordered, What is the cost to me to search the stopped meter records containers only for requests 1-4?

Thaddeus T. D'Ambrosia
2736 Massachusetts Court
Harrisburg, PA 17112

From: "Kimberly Krupka" <KKrupka@grossmcginley.com>
To: "Thaddeus T. D'Ambrosia" <tdambrosia@comcast.net>
Sent: Tuesday, September 27, 2011 11:35:14 AM
Subject: RE: Additional Documents

Mr. D'Ambrosia,

In response to Interrogatory Number 5, the meter number for that time period was 83512125.

In response to Interrogatory Number 6, please see the follow designations:

- a) Michelle Lawall-Schmidt - Project Manager, Revenue Assurance, PPL Electric Utilities
- b) Deborah Thiel - Customer Contact Supervisor, PPL Electric Utilities
- c) Anthony Osmanski - Supervising Engineer, Metering Support, Large Power, PPL Electric Utilities
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With regard to your requests 1-4, PPL hereby objects to the same as such requested documents (a) are not reasonably expected to lead to the discovery of admissible evidence, (b) as records concerning the accounts of other ratepayers, even with account numbers redacted, are confidential and cannot be produced without violation of the privacy rights of other ratepayers, and (c) as such information is not available to PPL without a manual review of the account of each ratepayer of record of PPL. As PPL does not have a computer program that would permit it to perform an electronic search to provide a response to Interrogatories 1-4, such request is unduly burdensome. In the alternative, should such request be ordered, such Order shall provide that Complainant pre-pay the costs associated with having staff review the records of each ratepayer to determine the information requested.

Kimberly Krupka

From: Thaddeus T. D'Ambrosia [mailto:tdambrosia@comcast.net]
Sent: Monday, September 26, 2011 6:09 PM
To: Kimberly Krupka
Subject: Re: Additional Documents

Thank you. Here are some additional requests:

1. What is the number of times in the past four years that PPL customers have had their billing payment arrangements marked kept because of " human error?"
2. Please identify all PPL customers (by redacted account number) who, in the past four years have had their billing payment arrangements marked kept because of "human error."
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6. What are the job titles of PPL employees Michelle Lawall-Schmidt, Deborah Thiel, Anthony Osmansky, Richard Hoffman, Susan Pellock, and Cheryl Mohr?

Thaddeus T. D'Ambrosia
2736 Massachusetts Court
Harrisburg, PA 17112
717-350-9227

From: "Kimberly Krupka" <KKrupka@grossmcginley.com>
To: "Thaddeus T. D'Ambrosia" <tdambrosia@comcast.net>
Sent: Monday, September 26, 2011 11:44:01 AM
Subject: Additional Documents

Mr. D'Ambrosia,

Attached please find additional documents responsive to your discovery requests of September 21, 2011. While we would normally produce documents all in one response, as the hearing date is approaching, I am providing documents upon receipt so that they can be provided in a timely manner. Upon receipt of additional responsive documents, I will forward the same to you.

Kimberly Krupka

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Kimberly Krupka

From: Kimberly Krupka
Sent: Monday, October 03, 2011 10:43 AM
To: 'Thaddeus T. D'Ambrosia'
Subject: RE: Additional Documents

Mr. D'Ambrosia,

While PPL is not opposed to a request for continuance, please let me know when your letter is filed as there are inaccuracies contained therein that I must address.

As we previously discussed, offers of settlement are confidential, and even the fact that PPL extended an offer is not to be communicated to the Commission. Second, your December 2, 2010 request was improperly served on the PUC Commission, not on PPL. Accordingly, it was not received by PPL until Judge Melillo provided us with a copy in an Order dated June 21, 2011 and received June 28, 2011. It is improper to allege that such discovery was outstanding since 2010, when you did not serve the same on PPL. Moreover, that letter requested e-mails specifically of September 10, 2009 and April 30, 2010. Accordingly, PPL was under no obligation to provide documents other than those specifically requested, as you were free to request different documents. It was not until September 21 that we received requests that requested additional documents.

As to the requests for identification of additional ratepayers, PPL's position is that we will not identify any ratepayer, regardless of cost search. The information pertaining to PPL ratepayers is completely confidential and we will not disclose their names, account numbers, or account information. Costs of searched become relevant only to the extent you are requesting non-identifiable information or information unique to you.

Should your request be altered to consider the above information, PPL will reconsider its position.

Kimberly Krupka

From: Thaddeus T. D'Ambrosia [mailto:tdambrosia@comcast.net]
Sent: Sunday, October 02, 2011 8:11 AM
To: Kimberly Krupka
Subject: Re: Additional Documents

Ms. Krupka:

Attached is my motion for an extension of time for discovery and rescheduling the hearing. Please let me know if you are opposed or agree, and I will notify Judge Melillo accordingly.

Here are some additional questions regarding the e-mail documents that were released to me on Sept. 23rd:

1. What is the project number that was assigned to create the system "change in the pipe to recognize when there is still a balance on the account keep the agreement active..." discussed in the June 22, 2010 e-mail from Richard H. Hoffman to Michelle Lawall-Schmidt, and Deborah M. Thiel?
2. When was the "change in the pipe" referred to in question #1 initiated?
3. What was the due date of the "change in the pipe" referred to in question #1?
4. When was the "change in the pipe" referred to in question #1 completed?

5. Describe the function of the "undelete" button which appears in the screen print of the payment agreement electronic record of account #59033-33376.

Thank you.

Thaddeus T. D'Ambrosia
2736 Massachusetts Court
Harrisburg, PA 17112

From: "Kimberly Krupka" <KKrupka@grossmcginley.com>
To: "Thaddeus T. D'Ambrosia" <tdambrosia@comcast.net>
Sent: Wednesday, September 28, 2011 8:30:55 AM
Subject: RE: Additional Documents

I am not certain what you mean as stopped meter records "containers". PPL maintains electronic account records. I would need to speak with an IT person, but believe a software program would have to be written to search for key words, etc.

From: Thaddeus T. D'Ambrosia [mailto:tdambrosia@comcast.net]
Sent: Wednesday, September 28, 2011 8:28 AM
To: Kimberly Krupka
Subject: Re: Additional Documents

If ordered, What is the cost to me to search the stopped meter records containers only for requests 1-4?

Thaddeus T. D'Ambrosia
2736 Massachusetts Court
Harrisburg, PA 17112

From: "Kimberly Krupka" <KKrupka@grossmcginley.com>
To: "Thaddeus T. D'Ambrosia" <tdambrosia@comcast.net>
Sent: Tuesday, September 27, 2011 11:35:14 AM
Subject: RE: Additional Documents

Mr. D'Ambrosia,

In response to Interrogatory Number 5, the meter number for that time period was 83512125.

In response to Interrogatory Number 6, please see the follow designations:

- a) Michelle Lawall-Schmidt - Project Manager, Revenue Assurance, PPL Electric Utilities
- b) Deborah Thiel - Customer Contact Supervisor, PPL Electric Utilities
- c) Anthony Osmanski - Supervising Engineer, Metering Support, Large Power, PPL Electric Utilities
- d) Richard Hoffman - Lead Business Systems Analyst, IT-Business Solutions, PPL Electric Utilities
- e) Susan Pellock - Analyst, Metering Support & Large Power, PPL Electric Utilities
- f) Cheryl Mohr - Steno/Clerk, Customer Contact Center, PPL Electric Utilities.

With regard to your requests 1-4, PPL hereby objects to the same as such requested documents (a) are not reasonably expected to lead to the discovery of admissible evidence, (b) as records concerning the accounts of other ratepayers, even with account numbers redacted, are confidential and cannot be produced without violation of the privacy rights of other ratepayers, and (c) as such information is not available to PPL without a manual review of the account of each ratepayer of record of PPL. As PPL does not have a computer program that would permit it to perform an electronic search to provide a response to Interrogatories 1-4, such request is unduly burdensome. In the alternative, should such request be ordered, such Order shall provide that Complainant pre-pay the costs associated with having staff review the records of each ratepayer to determine the information requested.

Kimberly Krupka

From: Thaddeus T. D'Ambrosia [mailto:tdambrosia@comcast.net]

Sent: Monday, September 26, 2011 6:09 PM

To: Kimberly Krupka

Subject: Re: Additional Documents

Thank you. Here are some additional requests:

1. What is the number of times in the past four years that PPL customers have had their billing payment arrangements marked kept because of "human error?"
2. Please identify all PPL customers (by redacted account number) who, in the past four years have had their billing payment arrangements marked kept because of "human error."
3. What is the number of times in the past four years that PPL customers have had their billing payment arrangements marked kept because of "system error?"
4. Please identify all PPL customers (by redacted account number) who, in the past four years have had their billing payment arrangements marked kept because of "system error."
5. What is the meter number of the PPL meter that was attached to my house for the period of August 16, 2006 through June 1, 2007?
6. What are the job titles of PPL employees Michelle Lawall-Schmidt, Deborah Thiel, Anthony Osmansky, Richard Hoffman, Susan Pellock, and Cheryl Mohr?

Thaddeus T. D'Ambrosia
2736 Massachusetts Court
Harrisburg, PA 17112
717-350-9227

From: "Kimberly Krupka" <KKrupka@grossmcginley.com>

To: "Thaddeus T. D'Ambrosia" <tdambrosia@comcast.net>

Sent: Monday, September 26, 2011 11:44:01 AM

Subject: Additional Documents

Mr. D'Ambrosia,

Attached please find additional documents responsive to your discovery requests of September 21,

2011. While we would normally produce documents all in one response, as the hearing date is approaching, I am providing documents upon receipt so that they can be provided in a timely manner. Upon receipt of additional responsive documents, I will forward the same to you.

Kimberly Krupka

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IRS CIRCULAR 230 DISCLOSURE: Pursuant to Treasury Regulations, any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used or relied upon by you or any other person, for the purpose of (i) avoiding penalties under the Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any tax advice addressed herein.

Kimberly Krupka

From: Kimberly Krupka
Sent: Thursday, November 03, 2011 5:53 PM
To: 'Thaddeus T. D'Ambrosia'
Subject: PPL - D'Ambrosia
Attachments: DOC110311-11032011174903.pdf

Dear Mr. D'Ambrosia,

Attached please find correspondence which I believe addresses all discovery requests sent via e-mail. As the scanned documents of account screens are eliminating information due to margins, I am mailing the same.

In addition, if you will be requesting certain PPL employees for witnesses, kindly let me know the same so I can attempt to have the same available.

Kimberly Krupka

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.
STUART T. SHMOOKLER
JAMES A. RITTER
JOHN F. GROSS
ROBERT A. ALPERT
ALLEN I. TULLAR
RAYMOND J. DeRAYMOND
THOMAS A. CAPEHART
KIMBERLY G. KRUPKA
KIMBERLY A. SPOTTS-KIMMEL
ANDREW H. RALSTON, JR.

GROSS 
McGINLEY^{LLP}
ATTORNEYS AT LAW

www.grossmcginley.com

Please reply to:
Allentown Office

Kimberly G. Krupka
kkrupka@grossmcginley.com

LOREN L. SPEZIALE*
MICHAEL J. BLUM **
SAMUEL E. COHEN*
EWALDE M. COOK
ROBERT G. VIDONI*
GRAIG M. SCHULTZ*

OF COUNSEL
MICHAEL J. PIOSA

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

November 3, 2011

Thaddeus D'Ambrosia
2736 Massachusetts Ct.
Harrisburg, PA 17112-9176

**RE: Thaddeus T. D'Ambrosia v. PPL Electric Utilities Corporation
No. C-20077882**

Dear Mr. D'Ambrosia:

Kindly accept this correspondence as a summary of PPL's responses to your various discovery requests. As these requests were made informally through e-mail over a series of days, it is my intent to provide you with correspondence which comprehensively addresses all requests, even though PPL has provided documents on a rolling basis in the interim.

With regard to you discovery request of September 21, 2001 as e-mailed to me at 4:33 p.m., PPL's responses are as follows:

1. "Any and all correspondence, e-mails, documents to and from Deborah M. Thiel and PPL's "technical folks" regarding/involving my account (#5903333376); 6/20/2007 through the present."

PPL formerly objects to the term "technical folks" as such term is undefined and PPL does not employ individuals with such titles. Without waiving said objection, PPL has provided to you a series of e-mails attached to my electronic communication with you on September 23, 2011 at approximately 5:00 pm.

2. "Any and all correspondence, e-mails, documents to and from Lyndsey Mowery and Deborah M. Thiel regarding my account; 6/20/2007 through present."

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

PPL hereby incorporates its response to interrogatory/document request No. 1 above.

3. "Customer service contact records from my account for the past four years."

PPL has provided this document as an attachment to my electronic communication with you on September 26, 2011 at 11:45 a.m.

4. "PPL's payment arrangement records from 10/29/2009 referred to in the 4/27/2010 e-mail from PUC Investigator Harold Williams to Lindsey Mowery."

As Mr. Williams is not a PPL employee, we cannot state what his intent was. However, PPL understand the payment agreement to refer to the prior PUC settlement between yourself and PPL. On August 3, 2007, PPL entered into a certificate of satisfaction with you. The terms of this satisfaction were:

(a) "Complainant, Thaddeus T. D'Ambrosia, and Respondent, PPL, agree to reduce the rebilled amount on account number 59033-33376 from \$2,539.28 to \$2,031.42.

(b) Complainant and Respondent agree that Complainant will have a payment agreement of current bill plus \$20.00 a month towards arrearages until all balance is paid in full.

(c) Complainant and Respondent agree that so long as Complainant complies with the payment arrangement, and makes timely monthly payments, PPL will not assess any late payment or interest fees.

This agreement was docketed in case C-20077882.

5. "PPL's billing investigation for the last four years involving my account."

PPL understands your inquiry to question investigations performed by PPL from September 21, 2007 to current. There have been no formal investigations concerning your account. The Customer Contact records provided and e-electronic communications referenced above concern inquiries regarding whether a payment agreement was marked as "kept" and responses to the Bureau of Consumer Services. By way of further response, see PPL's letter to you dated June 25, 2010, as previously produced.

6. "Please provide a copy of PPL's e-mail retention policy."

PPL does not have a separate policy with regard to the retention of electronic communications (e-mails). PPL has a record retention policy which governs records, regardless of whether such records are in electronic or paper form. PPL objects to provision of its record retention policy as all records pertaining to Complainant's account for the past four (4) years have been provided. The allegations of Complainant's Complaint concern alleged billing errors and/or collection efforts from 2009 to present. Internal electronic communications assigning work projects and that do not contain contacts from or to customers are not considered to be Company records which are covered by a Document Retention Policy.

7. Please provide a copy of PPL's Document Retention Policy."

November 3, 2011

PPL objects to provision of its record retention policy as all records pertaining to Complainant's account for the past four (4) years have been provided. The allegations of Complainant's Complaint concern alleged billing errors and/or collection efforts from 2009 to present. Internal electronic communications assigning work projects and that do not contain contacts from or to customers are not considered to be Company records which are covered by a Document Retention Policy.

8. "Please provide the last name and address of Customer Service representative Danielle; with whom I spoke on 10/19/09."

As indicated in my e-mail to you of September 23, 2011, Danielle's last name is Yurcho. Ms. Yurcho can be contacted through me as counsel for PPL. Should you intent to request Ms. Yurcho appear and testify, kindly let me know as soon as possible, and I will work to arrange her appearance.

9. "Please provide a copy of Danielle's Customer Service Notes and documents, e-mails, regarding the conversations on 10/19/2011."

See documents provided on September 26, 2011.

10. "Please identify all third party vendors or agents who provide Customer Service or Call Center services to PPL."

The individuals providing Customer Service/Call Center Services (other than foreign language interpretation, which is not applicable to the instant action), are employees of PPL Electric Utilities.

With regard to you discovery request of September 26, 2001 as e-mailed to me at 6:09 p.m. PPL's responses are as follows:

1) "What is the number of times in the past four years that PPL customer have had their billing payment arrangements marked kept because of "human error?""

As stated in my September 27, 2011 response to you via electronic communication,

"With regard to your requests 1-4, PPL hereby objects to the same as such requested documents (a) are not reasonably expected to lead to the discovery of admissible evidence, (b) as records concerning the accounts of other ratepayers, even with account numbers redacted, are confidential and cannot be produced without violation of the privacy rights of other ratepayers, and (c) as such information is not available to PPL without a manual review of the account of each ratepayer of record of PPL. As PPL does not have a computer program that would permit it to perform an electronic search to provide a response to Interrogatories 1-4, such request is unduly burdensome. In the alternative, should such request be ordered, such Order shall provide that Complainant pre-pay the costs associated with having staff review the records of each ratepayer to determine the information requested."

By way of further response, PPL objects as Complainant does not have standing to bring a claim on behalf of any other ratepayer, and therefore, such information is not likely to lead to the discovery of admissible information.

2) "Please identify all PPL customers (by redacted account number) who, in the past four years have had their billing payments arrangements marked kept because of human error."

Please see answer to Interrogatory 1, above.

3) What is the number of times in the past four years that PPL customer have had their billing payment arrangements marked kept because of "system error?"

Please see answer to Interrogatory 1, above.

4) "Please identify all PPL customers (by redacted account number) who, in the past four years have had their billing payment arrangements marked kept because of system error."

Please see answer to Interrogatory 1, above.

5) What is the meter number of the PPL meter that was attached to my house for the period of August 16, 2006 through June 1, 2007.

As stated in my electronic communication to you on September 27, 2011,

"In response to Interrogatory Number 5, the meter number for that time period was 83512125."

6) "What are the job titles of PPL employees Michelle Lawall-Schmidt, Deborah Thiel, Anthony Osmansky, Richard Hoffman, Susan Pellock, and Cheryl Morh.

As stated in my electronic communication to you on September 27, 2011,

"In response to Interrogatory Number 6, please see the follow designations:

- a) Michelle Lawall-Schmidt - Project Manager, Revenue Assurance, PPL Electric Utilities
- b) Deborah Thiel - Customer Contact Supervisor, PPL Electric Utilities
- c) Anthony Osmanski - Supervising Engineer, Metering Support, Large Power, PPL Electric Utilities
- d) Richard Hoffman - Lead Business Systems Analyst, IT-Business Solutions, PPL Electric Utilities
- e) Susan Pellock - Analyst, Metering Support & Large Power, PPL Electric Utilities
- f) Cheryl Mohr - Steno/Clerk, Customer Contact Center, PPL Electric Utilities."

With regard to your e-mail of September 30, 2011 as e-mailed to me at 3:02 p.m. PPL's responses are as follows:

You inquired as to the function of the "undelete button." This button was not active for the customer representative.

With regard to your e-mail of October 2, 2011 as e-mailed to me at 8:11 a.m., PPL's responses are as follows:

1) "What is the project number that was assigned to create the system "change in the pipe to recognize when there is still a balance on the account keep the agreement active . . ." discussed in the June 22, 2010 e-mail from Richard H. Hoffman to Michelle Lawall- Schmidt, and Deborah M. Thiel.?"

PPL is not in possession of any information responsive to a job number relative to the June 22, 2010 e-mail.

2) When was the "Change in the pipe referred to in question #1 initiated?"

"The change in the pipe" referenced was included in a June 2010 e-mail, which PPL has produced. There have been no formal changes to PPL's billing methods responsive to this request. By way of further response, PPL has acknowledged human error occurred, and denies any systemic error.

3. "What is the due date of the "change in the pipe" referred to in question #1?"

Please see answer to Interrogatory number 2, above.

4. When was the "change in the pipe" referred to in question #1 completed?

Please see answer to Interrogatory number 2, above.

5. Describe the function of the "undelete" button which appears in the screen print of the payment agreement electronic record of account #59033-33376."

PPL retains several electronic records for your account. However, it is believed this refers to a payment arrangement record. This button was not active for the customer representative.

With regard to your e-mail of October 2, 2011 as e-mailed to me at 9:01 a.m., PPL's responses are as follows:

You questioned who searched for and printed the account statements and contacts provided. Upon your request for account activity statements and customer contacts, Deborah Thiel obtained the same from PPL's computers and provided the same to counsel. Ms. Thiel did not create the information contained within the documents, but obtained the same from PPL's electronic documents. Such statements were printed on September 23, 2011, but created as contacts on the account were received or made and as payments were made or charged assessed.

With regard to you discovery request of October 10, 2011 , PPL's responses are as follows:

1-4) These interrogatories are repetitive of interrogatories above, which have been answered above and/or on earlier dates. Please see answers above.

5) "Please provide any and all e-mails, documents and correspondent to and from Richard H. Hoffman and Michelle Lawwall-Schmidt regarding ratepayers'* payment agreements being cancelled because of system error(s). (*Not individual ratepayers).

PPL is not in possession of electronic communications between Mr.Hoffman and Ms. Lawall Schmidt regarding errors not pertaining to individual ratepayers, other than those already produced.

6) "Please provide any and all e-mails, documents and correspondent to and from Richard H. Hoffman and Michelle Lawwall-Schmidt regarding ratepayers'* payment agreements being cancelled because of human error(s). (*Not individual ratepayers).

PPL is not in possession of electronic communications between Mr.Hoffman and Ms. Lawall Schmidt regarding errors not pertaining to individual ratepayers, other than those already produced.

7) "Please provide any and all e-mails, documents and correspondent to and from Michelle Lawwall-Schmidt and Robert M. Geneczko regarding ratepayers'* payment agreements being cancelled because of system error(s). (*Not individual ratepayers).

PPL is not in possession of electronic communications between Mr.Geneczko and Ms. Lawall Schmidt regarding errors not pertaining to individual ratepayers, other than those already produced.

8) "Please provide any and all e-mails, documents and correspondent to and from Michelle Lawwall-Schmidt and Robert M. Geneczko regarding ratepayers'* payment agreements being cancelled because of human error(s). (*Not individual ratepayers).

PPL is not in possession of electronic communications between Mr.Geneczko and Ms. Lawall Schmidt regarding errors not pertaining to individual ratepayers, other than those already produced.

9) The screenprint of Document #092611-0926011113748 indicates that the horizontal scroll bar is active; therefore, more data/information is available for viewing. The vertical scroll bar is not active. Please provide full disclosure of the information.

PPL is mailing the same so that all margins are clear.

10) "Please identify the PPL employee who searched for and created the screen print showing the electronic record for Account #59033-33376."

Thaddeus D'Ambrosia

Page 7

November 3, 2011

PPL is uncertain as to what document is referenced to as "electronic document." To the extent such reference relates to the Customer Contacts or Account Activity Statement, Deborah Thiel obtained the same from PPL's electronic records and provided the same to counsel. Such records were not made by Deborah Thiel.

11 – 12) Repetative of prior requests which are answered above.

13) "Please provide any and all e-mails, documents and correspondent to and from Deborah M. Thiel and Robert M. Genczko regarding ratepayers'* payment agreements being cancelled because of system error(s). (*Not individual ratepayers).

PPL is not aware of any responsive documents.

14) "Please provide any and all e-mails, documents and correspondent to and from Deborah M. Thiel and Michelle Lawall-Schmidt regarding ratepayers'* payment agreements being cancelled because of system error(s). (*Not individual ratepayers).

PPL is not aware of any responsive documents.

15) Please provide a copy of the document identified as D'Ambrosia -Formal.resp.doc and attached to the June 25, 2010 e-mail from Suzanne M. Hartzell to Deborah M. Thiel.

See documents attached hereto.

16) Please identify the human being who made the "HUMAN ERROR" referred to in the June 22, 2010 e-mail from Michelle Lawall-Schmidt to Deborah M. Thiel and Richard H. Hoffman."

At this time, PPL has been unable to identify a specific person from its records.

17) Please provide copies of PPL's payment arrangements records from 10/29/2009 referred to in the 4/27/2010 e-mail from PUC Investigator Harold Williams to Lyndsey Mowery.

Please see documents produced on September 26, 2011.

18. "Please provide any and all correspondence, e-mails, documents to and from Deborah M. Thiel and Robert M. Genczko and regarding my account #59033-33376; 6/20/2007 through present.

PPL is not aware of any responsive documents.

19. "Please provide any and all correspondence, e-mails, documents to and from Michelle Lawall-Schmidt and Robert M. Genczko regarding my account #59033-33376; 6/20/2007 through present.

PPL is not aware of any responsive documents.

Thaddeus D'Ambrosia
Page 8
November 3, 2011

20) "Please provide any and all correspondence, e-mails, documents to and from Danielle Yurcho and Deborah M. Thiel regarding my account #59033-33376; 6/20/2007 through present.

PPL is not aware of any responsive documents.

Should you have questions concerning the above, kindly contact me.

Very truly yours,

A handwritten signature in cursive script that reads "Kimberly G. Krupka". The signature is written in black ink and is positioned above the printed name.

KIMBERLY G. KRUPKA

KGK/dm
00411697.DOC

Opening (22) Pending (3) Mediations Informals Formals Admin

- Home
- My Work (2)
- Case Search
- Reports
- Formal Search
- Create Formal
- Assign Formals
- List Formals

Create Formal

Formal General Information

Notes (0)

CSS			
Account No.	5903333376	Docket No.	F102181822
Customer Name	Thaddeus D'Ambrosia	BCS Case No.	2607995
Received Date	06/18/2010	OGC Due Date	06/26/2010

What is your complaint? Thaddeus D'Ambrosia states that PPL says that the module was stuck but working intermittently. They blamed it on computer problem. Then they cancelled his payment agreement and blamed it on computer error.

What would you like the PUC to do about your complaint? Mr. D'Ambrosia wants to know all about each of PPL's computer errors (what, when why) as well as who else was affected by PPL's computer problems (who, how many customers, whom, etc.,) He wants everything investigated completely this time and he wants copies of all

Assignment Category & Details

Formal Reason	CSS problem	
Primary Contact Person	E85268-Thiel, Deborah M	<input type="button" value="Select.."/>
Secondary Contact Person		<input type="button" value="Select.."/>
Tertiary Contact Person		<input type="button" value="Select.."/>
Assign To Section	CCC	

Special Instructions PUC Formal Complaint Docket No. F-2010-2181822 (Prior PUC FORMAL Complaint C-20077882 Also see PUC Mediation BCS No. 2607995). Payment Agreement / CSS Billing issue. Referred to CCC Supv. Deb Thiel for review and response to OGC.

Mediation Case View

General

BCS Case No.	2607995	Case Notes	Count : 0 <input type="button" value="Detail..."/>
CSS Account No.	5903333376	Received Date	10/19/2009
CSS Name	THADDEUS D'AMBROSIA	Due Date	11/17/2009
PUC Name	THADDEUS D'AMBROSIA	Investigator Name	WILLIAMS, JR, HAROLD
Service Address 1	2736 MASSACHUSETTS CT	Mailing Address 1	
Service Address 2		Mailing Address 2	
Service City, State Zip	HARRISBURG, PA 17112-	Mailing City, State Zip	, -
PUC Address	2736 MASSACHUSETTS COURT,,HARRISBURG,PA,17112-		
Service Class	RESIDENTIAL	Case Origin	TELEPHONE
Phone Number	(717) 695-4648	Prior Case Number	2140239
Income Level	1	On Track	No
Reason For Contact	ON - PAR WITH DISPUTE (#63)		
Customer Position			
Company Position	10/19/2009 CO STOPPED PUC PAR BECAUSE THEY SAID IT WAS COMPLETED		
Related Information	PAR // WITH DISPUTE // CUST HAS BEEN PAYING AS AGREED. CO TOLD HIM HIS ARRANGEMENT WITH THE PUC HAD BEEN COMPLETED AND HE NEEDED A NEW PAYMENT ARRANGMENT WITH THEM. CUST IS DISPUTING THIS - SAYS NEVER PAID TO ZERO, WANTS HIS ARRANGEMENT FROM THE PUC RE-INSTATED		
Misc Info	CELL/WORK		
Heating	Yes	Service	On
Acct Bal Due Date	10/23/2009	Total Account Balance	1407.47
Budget Bill		Termination	

Amount	181.00	Date	10/22/2009
Arrearage	1427.47	Reported Income Amount	5000.00
Date of Last Customer Contact prior to Complaint			10/19/2009

Type Assignment

Case Type Mediation
 Mediation Type Long

Ownership

Contact Person E04580 - Mowery, Lyndsey M

Income Fields

Total Gross Income	3600.00	Employment Income	3600.00
DPW		Social Security	
Unemployment Comp		Disability	
Pension		Other	
Date Info Obtained	08/09/2007		

Other Information

Adults	4	Children	3
Amount Needed to Update Most Recent Payment Arrangement		Universal Service Program	No

Final Report

Did the customer accurately state the company position? Yes

What did the company tell the customer? On 10/06/2009 the customer contacted the company, but the customer didn't want to because she was persistent that she was on a p/a with the PUC. We explained the p/a was completed, but b/c she now has another o/d balance we need to set up a new p/a. Cust declined p/a.

Dispute Information NONE

Company Final Position The company is requesting the customer to call and set up a p/a. BCS#2140239 closed 03/29/2007 has been satisfied.

CAP Amount (OnTrack)

Prior Agreement Information

Type	Date	Balance	Income Level	Terms
PUC	8/9/2007	\$2,158.77	1	4 adults. PUC non c/u pa of \$0 by 08/22/2007, then CB+20 beg 09/21/2007.

Payment Arrangement Information

Date	Amount	Method
10/21/2009	182.60	
9/29/2009	195.99	
8/31/2009	197.16	
7/31/2009	165.67	
6/26/2009	163.06	
5/29/2009	200.31	

Analysis Information

Justified No

No Analysis Items Found

- Case History
- Return to Normal View
- Change State
- Dismiss

Informals Formals

- Home
- Case Search
- Reports
- Formal Search
- Create Formal
- Assign Formals
- List Formals

Decision Detail

General

BCS Case No.	2607995	CSS Account No.	5903333376
Customer Name	THADDEUS D`AMBROSIA	Investigator Name	WILLIAMS, JR, HAROLD
Address 1	2736 MASSACHUSETTS CT	Service Class	RESIDENTIAL
Address 2		Case Origin	TELEPHONE
City, State Zip	HARRISBURG, PA 17112	Head Date	05/06/2010
Service Restore Amount	0.00	Current Monthly Payment	20.00
Service Continue Amount	0.00	Service Continue Date	
Decision Issue	Yes	Ending Monthly Payment	0.00
Chapter		Oral/Written	Written
Section Rule		Violation	NO
Total Balance	1502.95	Closed Date	05/04/2010
Reconnect Amount	0.00	Balance Date	05/04/2010
Special Budget Amount	0.00	Regular Budget Amount	0.00
Arrears Payment Plus	0.00	Final Monthly Payment	0.00

Resolution SEE TERMS FOR PAYMENT ARRANGEMENT.... APPLY LPC`S... RATEPAYER`S DISPUTE OF 10/19/09 IS THAT RATEPAYER HAS BEEN PAING ON ACCT AS AGREED AND CO INFORMED HIM THAT PAR WAS COMPLETED AND RATEPAYER REQUIRED A NEW PAR. RATEPAYER DISPUTES AS ACCT WAS NEVER PAID TO A ZERO BAL AND WANTS PUC FORMAL PAR RE-INSTATED...PER CO E-MAIL OF 4/29/10 AND FORMAL C-20077882 OF 8/31/07 RATEPAYER TO PAY CB + 20 BEGIN W/5/2010 BILLING DUE DATE...

Terms 5/2010 DUE DATE

Letter

Description EGW STRAIGHT PAR/CURRENT BILL +

Action Required Options

Action Required	Yes	No
WorkQ Category		
Sub Category		
Up Front Amount		Up Front Due Date
Bill Type		
Plus Amount		
Beginning Date		
Write-Off Amount		

Comments

Processed By SYSTEM

Processed Date 5/4/2010 2:00:41 PM

[Return to Case](#)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

THADDEUS D'AMBROSIA,
COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,
RESPONDENT.

COMPLAINT DOCKET
NO. F-2010-2181822

RECEIVED

NOV -7 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

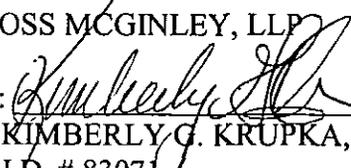
CERTIFICATE OF SERVICE

THIS IS TO CERTIFY THAT THE ANSWER OF PPL ELECTRIC UTILITIES TO COMPLAINT'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS 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.

THADDEUS D'AMBROSIA
2736 MASSACHUSETTS CT.
HARRISBURG, PA 17112

ADMINISTRATIVE LAW JUDGE KANDACE F. MELILLO
PENNSYLVANIA PUBLIC UTILITIES COMMISSION
P.O. BOX 3265
KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PA 17120

GROSS MCGINLEY, LLP

BY: 

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

COUNSEL FOR DEFENDANT,
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