

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Thaddeus D'Ambrosia, Complainant	:	
	:	
v.	:	F-2010-2181822
	:	
PPL Electric Utilities Corporation, Respondent	:	

NOTICE

TO: PP&L ELECTRIC UTILITIES CORPORATION:

You are hereby notified that you have ten (10) days from the date of service of this Application in which you can object in writing to the attached COMPLAINANT'S APPLICATION FOR SUBPOENA FOR MICHELLE LAWALL-SCHMIDT AND ANTHONY M. OSMANSKI. Said objections must be filed with the PA Public Utility Commission, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120, and the Honorable Kandace F. Melillo, Office of ALJ, PA Public Utility Commission, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120

By:

/s/

Date: November 16, 2011

Thaddeus D'Ambrosia
22736 Massachusetts Court
Harrisburg, PA 17112
(717)-350-9227

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Thaddeus D’Ambrosia, Complainant	:	
	:	
v.	:	F-2010-2181822
	:	
PPL Electric Utilities Corporation, Respondent	:	

**COMPLAINANT’S APPLICATION FOR SUBPOENA FOR
MICHELLE LAWALL-SCHMIDT AND ANTHONY M. OSMANSKI**

TO ADMINISTRATIVE LAW JUDGE KANDACE F. MELILLO:

Thaddeus D’Ambrosia (“Complainant or D’Ambrosia”) hereby files and requests, pursuant to 52 Pa. Code § 5.421, a subpoena for Michelle Lawall-Schmidt and Anthony M. Osmanski in order to guarantee their appearance and testimony at the formal hearing in the above-captioned matter at the Commonwealth Keystone Building, at 10:00 a.m. on November 30, 2011.

In support, Complainant states as follows:

1. On June 9, 2010, Complainant filed with the Pennsylvania Public Utility Commission a Complaint against PPL Electric.
2. Complainant’s payment agreement with PPL Electric Utilities was prematurely cancelled by PPL’s automated billing systems.
3. Respondent has replied that the payment agreement at issue was terminated by human error, but has been unable to identify the human being who made the error.
4. It is believed and averred that Michelle Lawall-Schmidt and Anthony M. Osmanski can testify with specificity regarding the events surrounding the termination of Complainant’s payment agreement. Accordingly, their testimony is both relevant and material.
5. It is also believed that Michelle Lawall-Schmidt and Anthony M. Osmanski can testify with specificity regarding problems with and corrections to PPL’s payment arrangement systems that led to the premature cancellation of Complainant’s payment agreement with PPL.

WHEREFORE, Complainant respectfully requests Administrative Law Judge Melillo issue subpoenas to Anthony M. Osmanski and Michelle Lawall-Schmidt to testify at the November 30, 2011 hearing on behalf of Complainant in this matter.

Respectfully submitted,

/s/

Thaddeus 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 E-MAIL & FIRST CLASS MAIL

The Honorable Kandace F. Melillo
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

KIMBERLY G KRUPKA ESQUIRE

GROSS MCGINLEY LLP
33 SOUTH SEVENTH STREET
PO BOX 4060
ALLENTOWN PA 18105-4060
610.820.5450

VIA FIRST CLASS MAIL

Michelle Lawall-Schmidt
Anthony M. Osmanski
PPL Electric Utilities
Two North Ninth Street
Allentown, PA 18101

/s/

Date: November 16, 2011

Thaddeus D'Ambrosia