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January 9, 2012

VIA FEDERAL EXPRESS

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

**RE: Samy Azer v PPL Electric Utilities Corporation
Docket No: C-2011-2272185**

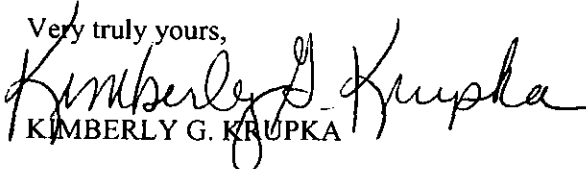
**Samy Azer v PPL Electric Utilities Corporation
Docket No: F-2011-2248345**

Dear Ms. Chiavetta:

Enclosed for filing in the above-captioned matter is the original Motion to Consolidate of PPL Electric Utilities Corporation.

Pursuant to 52 Pa. Code §1.11, the enclosed document is deemed to be filed on January 9, 2012, 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/dm
Enclosures

cc: Samy Azer (w/ enc)
Administrative Law Judge Joel Cheskis (w/ enc.); *via facsimile and U.S. Mail*
Kimberly A Galligani (w/ enc); *via email*
Karen A. Posten (w/ enc); *via email*
00427454.DOCX

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SAMY AZER,
COMPLAINANT,
VS.
PPL ELECTRIC UTILITIES CORPORATION,
RESPONDENT.

COMPLAINT DOCKET

NO. F-2011-2248345

SAMY AZER,
COMPLAINANT,
VS.
PPL ELECTRIC UTILITIES CORPORATION,
RESPONDENT.

COMPLAINT DOCKET

NO. C-2011-2272185

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

NOTICE TO PLEAD

TO: SAMY AZER
3220 W. WALKER RD.
BATH, PA 18014

Pursuant to 52 Pa. Code Section 5.62 and 5.63, you are hereby notified that you have ten (10) days from the date of service of the within Motion to Consolidate in which to answer, and that if you fail to so answer within ten (10) days from the date of service, Respondent's Motion to Consolidate may be granted without further notice.

Respectfully submitted,

GROSS MCGINLEY, LLP

BY: 

KIMBERLY G. KRUPKA, ESQUIRE

Attorney for Respondent, PPL Electric Utilities Corporation

Dated: January 9, 2012
In Allentown, Pennsylvania

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SAMY AZER,
COMPLAINANT,
VS.
PPL ELECTRIC UTILITIES CORPORATION,
RESPONDENT.

COMPLAINT DOCKET
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COMPLAINT DOCKET
NO. C-2011-2272185

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

ORDER

AND NOW, this _____ day of _____, 2012, upon consideration
of the annexed Motion for Consolidation,

IT IS ORDERED that the above-captioned appeals are hereby consolidated.

BY THE COURT:

J.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SAMY AZER,
COMPLAINANT,
VS.
PPL ELECTRIC UTILITIES CORPORATION,
RESPONDENT.

COMPLAINT DOCKET
NO. F-2011-2248345

SAMY AZER,
COMPLAINANT,
VS.
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MOTION TO CONSOLIDATE

PPL Electric Utilities Corporation, by their attorneys, Gross, McGinley, LLP, hereby respectfully hereby file the following Motion to Consolidate, and in support thereof aver as follows:

1. Movant is PPL Electric Utilities Corporation, Respondent in the above captioned matters.
2. Respondent is Samy Azer, Complainant in the above captioned matters.
3. On or about June 24, 2011, Respondent, Samy Azer, filed a Complaint with the Pennsylvania Public Utility Commission at Docket Number F-2011-2248345, contending PPL

charged him an incorrect rate on the meter servicing 3220 W. Walker Road, Bath, PA 18104. Moreover, Complainant alleged that the meter was over-recording electric usage.

4. On or about October 31, 2011, Samy Azer, filed a Complaint with the Pennsylvania Public Utility Commission at Docket Number C-2011-2272185, contending PPL improperly charged his account, which services 3220 W. Walker Road, Bath, PA 18104. More specifically, Respondent contended that he requested PPL remove the meter servicing a mobile home on this property and that PPL failed to do so.

5. The Complaints at docket numbers F-2011-2248345 and C-2011-227218 involve electric service to the same physical property, during the same periods of time.

6. Consolidation of all two Complaints will serve judicial economy and the convenience of the parties and counsel.

WHEREFORE, PPL Electric Utilities Corporation, respectfully requests the matters captioned at Dockets F-2011-2248345 and C-2011-227218 be consolidated.

DATE: JANUARY 9, 2012

GROSS/MCGINLEY, LLP

BY:


KIMBERLY G. KRUPKA, ESQUIRE

ATTORNEY FOR RESPONDENT

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SAMY AZER,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. F-2011-2248345

SAMY AZER,

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COMPLAINT DOCKET

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

This is to certify that MOTION TO CONSOLIDATE of PPL ELECTRIC UTILITIES CORPORATION TO THE COMPLAINT OF SAMY AZER, was mailed to counsel/complainant of record on behalf of Complainant by first class United States mail, postage on this the 9th day of January 2012.

SAMY AZER 3220 W. WALKER RD. BATH, PA 18014	ADMINISTRATIVE LAW JUDGE JOEL CHESKIS COMMONWEALTH KEYSTONE BUILDING 400 NORTH STREET, P.O. Box 3265 HARRISBURG, PA 17120
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GROSS MCGINLEY, LLP

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

Counsel for Defendant, PPL Electric Utilities Corporation
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