

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JOSEPH REISINGER, JR.,	:	
	:	
Complainant	:	Complaint Docket No.:
	:	C-2011-2255288
v.	:	
	:	
PPL ELECTRIC UTILITIES CORP.	:	
	:	
Respondent	:	

**COMPLAINANT’S INTERROGATORIES ADDRESSED TO
RESPONDENT PPL ELECTRIC UTILITIES CORPORATION**

The Complainant, Joseph R. Reisinger, Jr., by and through his counsel, Kevin Walsh, Esquire, hereby submits these Interrogatories Addressed to Respondent PPL Electric Utilities Corporation in accordance with 52 Pa. Code § 5.341 and to be answered in writing within twenty (20) days from the date of service hereof in accordance with 52 Pa. Code § 5.342.

I. Definitions and Instructions

Please note that the following definitions and instructions shall apply and shall be considered an integral part of these interrogatories:

A. "Respondent," "you" and/or "yours" shall mean Respondent PPL Electric Utilities Corporation or any person acting on its behalf.

B. "Complainant" shall mean Complainant Joseph R. Reisinger, Jr. or any person acting on behalf of Joseph R. Reisinger, Jr.

C. "Document" shall mean all written or graphic matter of every kind or description, however produced or reproduced, whether drafted or final, original or reproduction, signed or unsigned, and regardless of whether approved, signed, sent, received, redrafted, or executed, including but not limited to: written communications, letters, correspondence, memoranda, minutes, notes, photographs, slides, motion pictures, telegrams, telex messages, tape or sound recordings, recordings of any type, contracts, agreements, purchase or sale orders, memoranda of telephone conversations or personal conversations, diaries, desk calendars, interoffice communications, reports, studies, bills, receipts, logs, checks, checkbooks, invoices, requisitions, personal expense accounts, or material similar to any of the foregoing; however denominated and by whomever prepared and to whomever addressed which are in your possession, custody or control or to which you have had, or can obtain access. "Document" shall not include exact duplicates when originals are available but shall include all copies made different from originals by virtue of any writing or notation thereon.

D. "Identify" shall mean, when used in reference to:

1. A natural person—to state the person's:

(a) full name;

(b) present or last-known business and residential addresses;

(c) present or last-known position, business affiliation and job description; and

(d) position, business affiliation, and job description at the time in question with respect to the interrogatory or other request involved.

2. A document—to state the following with respect to the document:

(a) its description (e.g., letter, memorandum, report, etc.);

(b) its title, date, and number of pages;

(c) its subject matter;

(d) the name, address, and position of the author(s) or signer(s) thereof;

(e) the name, address and position of the addressee(s);

(f) the name, address and position of each person who received a copy of the documents; and

(g) its present location and the name, address, and position of the person having present possession, custody and/or control thereof.

3. An oral communication—to state the following with respect to the communication:

(a) the date and place where it occurred;

(b) its substance;

(c) the name, address and position of the person who made the communication;

(d) the name, address and position of each person to whom such communication was made; and

(e) the name, address and position of each person who was present when such communication was made.

4. A company, corporation, association, partnership or other legal or business entity not a natural person—to state its:

(a) full name;

(b) address of principal place of business; and

(c) description of type of entity.

5. An act, occurrence, or specific conduct (hereinafter referred to collectively as "act"):

(a) describe the substance of the event or events constituting such act;

(b) state the date when such act occurred;

(c) identify each person who participated in such act;

(d) identify all other persons who were present when such act occurred; and

(e) state whether any document was made recording such act and if so, identify each such document.

E. "Communication" shall mean any transmission of thoughts, opinions or information by speech, writing or signs.

F. "Person" shall include natural persons, partnerships, associations, corporations, leagues, governments, (including all instrumentalities, officers, agents and subdivisions thereof) and all other business, legal and artificial entities.

G. In answering these interrogatories, you are required to furnish all information which is available to you, including that which has been obtained by and that which is now in the possession of your attorneys, employees, agents and other representatives, and not merely the information known by the individual or individuals preparing the response.

H. If you are unable to answer any of the within interrogatories fully and completely, after exercising due diligence to secure the information necessary to make such full and complete answers, so state, and in addition, answer the remainder, and state whatever information or knowledge you may have concerning the unanswered portions thereof.

I. Insert your answers in the spaces provided, attaching additional pages as required for complete answers, identifying the interrogatory being answered..

J. These interrogatories shall be deemed to be continuing so as to require supplemental answers under oath if you obtain additional or further information

pertaining to any interrogatory subsequent to the time an answer to that interrogatory is served.

K. If you file an objection to any of the interrogatories propounded herein, you are nevertheless required to answer within the aforesaid twenty (20) day period the interrogatories not objected to.

L. Whenever any interrogatory calls for the identity of a document or communication as to which you claim privilege, include in the identification of such document or communication the fact of such claim of privilege and the basis asserted for such claim.

M. In lieu of identifying documents, you may supply the documents, or true and correct copies thereof, with your answers to these interrogatories. The documents should be segregated or otherwise identified to reflect the number of the interrogatory or interrogatories to which the document is responsive.

N. With respect to each interrogatory, in addition to supplying the information asked for and identifying the specific documents referred to, identify all documents which were referred to in preparing your answer thereof.

O. Unless the context otherwise requires, words in the singular include the plural and words in the plural include the singular; words of the neuter include the feminine and the masculine.

INTERROGATORIES

1. Give the names and addresses of the following persons:

(a) those who were involved in any way, including from the date of the initial request for service, in addition to the decision to refuse service to Complainant at the property in question, 27 Academy Street;

(b) those who were contacted by anyone in regard to any aspect, including the request for service, and then the later decision to refuse service to Complainant at the property in question, 27 Academy Street;

(c) those who have any information or knowledge concerning the facts, events, circumstances or conditions surrounding the happening of said occurrences.

2. State whether any person gave any statement or prepared any document, memorandum, drawing or any other tangible thing pertaining to the occurrence giving rise to this complaint.

(a) If your answer is in the affirmative, as to each person state the following:

(i) identify each person;

(ii) describe the nature of what was done or produced;

(iii) give the name and address of the person having custody of each item described above.

3. State whether any plans, drawings, blueprints, sketches or diagrams exist or were made of the site of the occurrence or the instrumentalities involved herein.

(a) If your answer is in the affirmative, state:

(i) the identity of each said plan, drawing, blueprint, sketch or diagram by subject matter;

(ii) the date and time of day when each of the same was made if subsequent to the occurrence;

(iii) the name, address and job classification of the person making same, if made subsequent to the occurrence;

(iv) the name, address and job classification of the person having custody of the plans, drawings, blueprints, sketches or diagrams.

4. Identify each person whom you expect to call as a witness at the trial of this action.

(a) as to each person so identified, state the subject matter on which they expert are expected to testify.

5. As to any expert witness, have him/her state the following and sign his/her answers:

(a) the substance of the facts and opinions to which s/he is expected to testify;

(b) a summary of the grounds for each opinion.

6. Please describe, in detail, your policy for restoring service to a location under the account of a new customer where it was cancelled due to the outstanding balance of a previous tenant.

7. For each person supplying information for and/or answering these interrogatories, please state:

- a. their name,
- b. business address,
- c. occupation and/or position relative to the Respondent, and
- d. the source of their knowledge.

Respectfully submitted,

Kevin M. Walsh, Esq.
297-299 Pierce Street
Kingston, PA 18704

Attorney for the Complainant