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File #: 2507/140074

June 5, 2012

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**RE: Tracey Andrews v. PPL Electric Utilities Corporation  
Docket No. C-2012-2304551**

**William Andrews v. PPL Electric Utilities Corporation  
Docket No. C-2012-2300410**

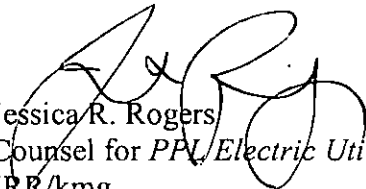
**PPL ELECTRIC UTILITIES CORPORATION MOTION TO CONSOLIDATE  
THE COMPLAINTS OF TRACEY AND WILLIAM ANDREWS**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") is the original Motion to Consolidate the Complaints of Tracey Andrews and William Andrews. Answers to these Complaints were filed on June 5, 2012 and May 24, 2012, respectively. In addition, I request that you forward the Consolidated Complaints to the Mediation Department.

Copies have been provided to the parties in the manner indicated on the Certificate of Service.

Very truly yours,

  
Jessica R. Rogers  
Counsel for PPL Electric Utilities Corporation  
JRR/kmg  
Enclosure  
cc: Certificate of Service  
Herbert R. Nurick, Mediator Coordinator

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Tracey Andrews,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2012-2304551
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	
	:	
William Andrews,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2012-2300410
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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**MOTION TO CONSOLIDATE**

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NOW COMES PPL Electric Utilities Corporation (“PPL Electric”), by and through its counsel, Post & Schell, P.C., and pursuant to 52 Pa. Code § 5.81 and § 5.103, hereby files this Motion to Consolidate the above-captioned Formal Complaints (“Complaint”). In support of its Motion, PPL Electric states as follows:

1. On April 24, 2012, William Andrews filed a formal complaint with the Pennsylvania Public Utility Commission (“Commission”) alleging that PPL Electric had refused to provide documentation regarding a right-of-way on Mr. Andrews’ property, and that the PPL Electric facilities on the property posed a safety hazard.

2. On May 16, 2012, Tracey Andrews filed a formal Complaint with the Commission making similar claims regarding requests for documentation as well as allegations of a safety hazard.

3. Tracey and William Andrews are married. Both Complaints address the same property. The issues raised and relief sought in the two Complaints are identical.

4. The Commission's Regulations at 52 Pa. Code § 5.81 provide that proceedings may be consolidated if they involve common questions of law or fact. In addition, consolidation is appropriate if doing so will avoid unnecessary costs or delay.

5. The Complaints will require the Commission to address the same questions of law and fact. The consolidation of the proceedings will preserve the time and resources of the parties and the Commission, and avoid a duplicative process that could potentially result in different findings of law and fact.

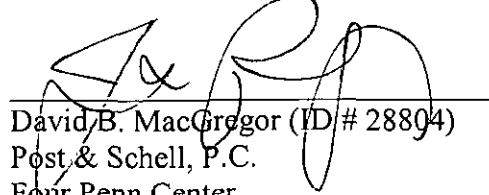
6. Further, and importantly, any relief requested in one Complaint must, by necessity, be considered in light of the other Complaint, as the physical property at issue in both Complaints is the same. A fair and equitable outcome for all parties requires the Commission to consider the interests of both Complainants, rather than adjudicating the individual claims separately.

7. The Complaint of William Andrews has already been referred to mediation. Consolidating the two identical complaints, which would result in sending the Complaint of Tracey Andrews to mediation as well, maximizes the efficient use of Commission resources, and ensures a consistent outcome between the two cases.

8. Consolidation of these matters will not prejudice either of the Complainants.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Formal Complaints of Tracey Andrews and William Andrews, at Docket Nos. C-2012-2304551 and C-2012-2300410, be consolidated and referred to mediation.

Respectfully submitted,



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Of Counsel:

Post & Schell, P.C.

Date: June 5, 2012

Attorneys for PPL Electric Utilities Corporation

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**CERTIFICATE OF SERVICE**  
**Docket No. C-2012-2304551**

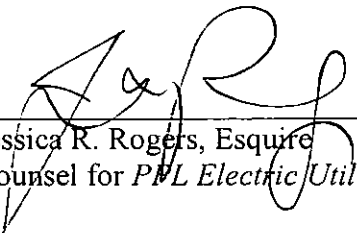
I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA FIRST CLASS MAIL**

Tracey Andrews  
40 Gordon Avenue  
Carbondale, PA 18407

William Andrews  
40 Gordon Avenue  
Carbondale, PA 18407

DATED: June 5, 2012



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Jessica R. Rogers, Esquire  
Counsel for *PPL Electric Utilities Corporation*

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