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June 6, 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

**RECEIVED**

JUN 06 2012

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**RE: Stefanie-Lee Pilipie v PPL Electric Utilities Corporation**  
**Docket No: F-2010-2210130**

Dear Ms. Chiavetta:

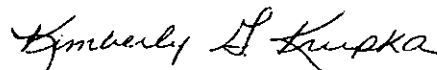
Enclosed for filing in the above-captioned matter are an original and nine (9) copies of the Reply of PPL Electric Utilities Corporation to Complainant, Stefanie-Lee Pilipie's Exceptions, along with the attached Certificate of Service.

Pursuant to 52 Pa. Code §1.11, the enclosed document is to be deemed filed on or before June 6, 2012.

I am also enclosing an extra copy of PPL's Reply. Please time-stamp this copy and return it to my office in the envelope provided.

Thank you for your cooperation in this matter.

Very truly yours,



KIMBERLY G. KRUPKA

KGK/dm

Enclosures

cc: Stefanie-Lee Pilipie (w/enclosure/via U.S. Mail)  
Administrative Law Judge Ember S. Jandebour (w/enclosure-via FedEx)  
Ms. Kim Safford (w/enclosure); *via email only*

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

STEFANIE-LEE PILIPIE,

COMPLAINANT

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. f-2010-2210130

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JUN 06 2012

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**PPL ELECTRIC UTILITIES CORPORATION'S REPLIES TO EXCEPTIONS  
OF COMPLAINANT, STEPHANIE-LEE PILIPIE**

AND NOW comes the Respondent, PPL Electric Utilities Corporation ("PPL"), by and through its attorneys of record, Gross McGinley, LLP, and files the within Replies to Exceptions, alleging in support thereof as follows:

1. Denied.<sup>1</sup> Complainant fails to set forth her Exceptions in numbered paragraphs, and further fails to identify with particularity either specific Findings of Fact or Conclusions of Law to which she excepts. Nonetheless, it appears that Complainant's sole Exception is that she was denied a full and fair opportunity to present her case against PPL because ALJ Jandebaur dismissed the Complaint for Complainant's failure to appear at a duly noticed hearing. More specifically, Complainant contends that while she never provided notice to the Commission that she was represented by counsel and while no attorney ever entered an appearance on her behalf in the instant case, that ALJ Jandebaur erred in not providing written notice of a hearing to her "still unidentified" attorney. Such allegation is simply not supported by the record in the case.

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<sup>1</sup> Complainant fails to set forth her Exceptions in numbered paragraphs. However, it appears that Ms. Bhatti is raising four issues. Therefore, PPL will address each separately.

Complainant alleges that she failed to attend the hearing because she believed her attorney had obtained a continuance. However, Complainant never notified the Commission or Counsel for Respondent that she was represented by an attorney before the filing of the instant Exceptions. A review of all the documents filed within this case reveal that at no time has Complainant ever provided the identity of an attorney representing her. The Complaint was signed on November 9, 2010 by Ms. Pilipie. Page six (6) of the Complaint requests that Ms. Pilipie identify an attorney, if she has one. Ms. Pilipie's response was "I may pursue." An initial hearing was scheduled to commence on January 5, 2012, by Notice dated October 27, 2011 and provided to all parties. Following the issuance of this notice, no attorney entered his or her appearance. On December 30, 2011, the Commission issued a Hearing Cancellation/Reschedule Notice, rescheduling the hearing for February 3, 2012. This notice was again sent to all parties, and once again no attorney entered his or her appearance on behalf of Ms. Pilipie. Once again, on March 5, 2012, the Commission issued a Hearing Cancellation/Reschedule Notice, rescheduling the hearing for April 13, 2012. Again, no attorney entered his or her appearance for Ms. Pilipie. When Ms. Pilipie did not attend the hearing, ALJ Jandebour issued an Order on May 4, 2012, dismissing the Complaint. Even after this Decision was issued, no attorney entered his or her appearance on behalf of Mr. Pilipie. Clearly, neither the Commission nor PPL was ever placed on notice that an Attorney is/was representing Ms. Pilipie.

Most telling, though, is that even within her Exceptions, Complainant does not provide the identity (name and address) of "her attorney." Complainant provides no affidavit signed by an attorney attesting to the factual allegations contained within the Exceptions. Even now that the Exceptions have been filed, the Commission and PPL


Electric Utilities are left to wonder, who is supposedly representing Ms. Pilipie, and who does she contend should be receiving notices of the hearing date.

Finally, it must be noted that even the Exceptions have been filed pro-se. Ms. Pilipie filed her Complaint pro-se, never notified the Court or Respondent that she was represented by counsel, never had her attorney enter an appearance, and is now filing documents again pro-se, without identifying an Attorney to whom these Replies may be addressed. This Complaint was filed in December 2010. At the requests of Ms. Pilipie, the hearing was delayed on three occasions. During this entire time, Ms. Pilipie has avoided paying for electric service. Now that a decision has been rendered, Ms. Pilipie asks this Commission for another hearing (and delay), without any evidence of record to support her claim that the Commission failed to provide notice of the hearing to an attorney she has yet to identify.

For the foregoing reasons, PPL respectfully requests the Commission deny the Exceptions of Complainant and affirm the decision of the Administrative Law Judge.

Respectfully submitted,

GROSS MCGINLEY, LLP

By:   
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Email: kkrupka@grossmcginley.com  
*Attorneys for PPL Electric Utilities Corporation*

Date: June 6, 2012

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

STEFANIE-LEE PILIPIE,

COMPLAINANT

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. F-2010-2210130

**CERTIFICATE OF SERVICE**

This is to certify that the REPLY TO EXCEPTIONS OF COMPLAINANT, STEFANIE LEE-PILIPIE on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record STEFANIE-LEE PILIPIE, on behalf of Respondent(s) by first class United States mail, postage on this the 6th day of June, 2012:

**VIA U.S. MAIL**

STEFANIE-LEE PILIPIE  
P O BOX 55  
WHITE MILLS PA 18473

**VIA FEDERAL EXPRESS**

THE HONORABLE EMBER S. JANDEBEUR  
SCRANTON STATE OFFICE BUILDING, ROOM 317  
100 LACKAWANNA AVENUE  
SCRANTON, PA 18503

**RECEIVED**

JUN 06 2012

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

GROSS MCGINLEY, LLP

By: 

KIMBERLY G. KRUPKA, ESQUIRE

I.D. # 83071

Attorney for Respondent

PPL Electric Utilities Corporation

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Allentown, PA 18105

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