

CAPTION SHEET

SE MANAGEMENT SYSTEM

- 1. REPORT DATE: 00/00/00
- 2. BUREAU: ALJ
- 3. SECTION(S):
- 5. APPROVED BY:
 - DIRECTOR:
 - SUPERVISOR:
- 6. PERSON IN CHARGE:
- 8. DOCKET NO: C-20054946
- 4. PUBLIC MEETING DATE: 00/00/00
- 7. DATE FILED: 07/14/05
- 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: MOTORSPORTS-MARKETING.COM, INC.

RESPONDENT/APPLICANT: PPL ELECTRIC UTILITIES CORP

COMP/APP COUNTY: WAYNE

UTILITY CODE: 110500

ALLEGATION OR SUBJECT

COMPLAINANT STATES PPL IS CONDUCTING ACCOUNTING IRREGULARITIES. THEY WANT THE PUC TO HAVE PPL CORRECT THE BILL AND NOT ENFORCE THE BILL UNTIL RESOLUTION OF THIS PROBLEM.

DOCUMENT
FOLDER

DOCKETED
AUG 18 2005

ORIGINAL

Formal Complaint Form

C-20054946

Please print or type.

1. CUSTOMER NAME (COMPLAINANT)

Your name, mailing address, county, telephone number, utility account number and service address:

Name MotorSports-Marketing.com, Inc

Street/P.O. Box RR 2 Box 2019 Apt #

City Beach Lake State PA Zip 18405

County Wayne

Area Code/HOME Phone 570.729.0948

Area Code/WORK Phone 570.729.1700

Utility Account Number 57101-20018 (from your bill)

RECEIVED 2005 JUL 14 AM 9:07 PA P.U.C. SECRETARY'S BUREAU

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name

Street/P.O. Box

City State Zip

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: PPL

3. TYPE OF UTILITY (check one)

X ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER (taxi, moving company, limousine)

TELEPHONE (local, long distance)

23

4. COMPLAINT (check one)

A. In general, what is your complaint?

- I want to oppose the company's proposed rate increase.
- There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.

Other.
(explain)

B. State the facts of your complaint.

Include any specific dates, times or places that are important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

PPL is conducting accounting irregularities. See enclosed sheets provided by PPL. I have marked the problem areas. Bill was at 0 and the useage and charges do not match. Additionally they have a charge for over \$600.00 to cancel electric.

5. RELIEF

What do you want the Public Utility Commission to do about your complaint? Use additional paper if you need more space.

Have PPL correct the bill and not enforce the bill until resolution of this problem.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution company, an electric distribution company or a water company **AND** your complaint is about a billing problem, an application for service problem, a termination of service problem or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety?

YES

NO I will be seeking

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES
(includes appeals of BCS determinations)

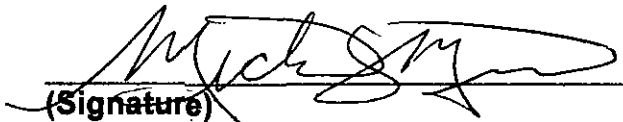
NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification:
I Michael C. Morris, President, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).


(Signature)

7-8-2005
(Date)

9. LEGAL REPRESENTATION (IF ANY)

If you are represented by a lawyer in this matter you must provide your lawyer's name, address and telephone number.

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

10. FILING

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
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Facsimiles and/or electronic filings of the complaint form will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your complaint for your records.

PPL Electric Utilities
827 Hausman Road
Allentown, PA 18104-9392
Tel. 800.342.5775 (484.634.4900) Fax 484.634.3484
www.pplweb.com



MR. MICHAEL MORRIS
MOTORSPORTS-MKTG.COM
RR2, BOX 2019
BEACH LAKE PA 18405

June 23, 2005

Subject: 57101-20018

Dear Mr. Morris:

On June 23, 2005, you contacted PPL regarding your account balance. You did not agree with the balance and after our Credit Supervisor reviewed your account with you over the phone, she advised you that we would send you a written statement of account for reconciliation of your records.

PPL's position is that your account balance is correct, unless we receive proof otherwise. A statement of your account is enclosed to help you understand your balance.

Your balance is \$1,467.92 and will become past due on July 8, 2005.

If you cannot pay the bill in full, please contact PPL to discuss payment options.

You can mail payments to PPL, Attn: Remittance Processing, Two North Ninth Street, Allentown, PA, 18101 or take them to a bill payment center.

If you don't agree with this report, you may file an informal complaint with the Pennsylvania Public Utility Commission. The complaint must be filed within ten (10) days of the date of this report to protect all of your rights. PPL will not shut off your service during this time or during the informal complaint process as long as you pay all undisputed bills.

An informal complaint can be filed by calling the Pennsylvania Public Utility Commission toll-free in PA at 1-800-782-1110. If you prefer, you may write the Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17105-3265.

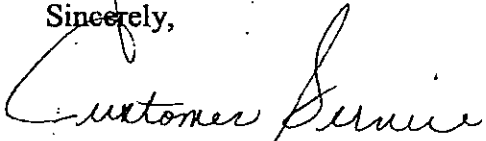
The Pennsylvania Public Utility Commission will ask you to provide the following information.

1. The customer's name and phone number.

2. The customer's mailing address and, if different, the service address.
3. The utility company's name and the customer's account number, if there is one.
4. A brief statement of the dispute and the relief sought.
5. Whether the company has already investigated and reported the dispute.
6. Whether the same formal or informal complaint was filed with the PUC in the past.
7. The proposed shut-off date, if any.

If you need additional information or have other concerns, please call PPL toll-free at 1-800-DIAL-PPL (1-800-342-5775).

Sincerely,



PPL Electric Utilities

Enclosure (Statement of Account)

DATE	TRANSACTION TYPE	DUE DATE	TRANSACTION AMOUNT	BALANCE FORWARD	ACTUAL BILLED	DEFERRED BALANCE	DEG DAY H/C	RDG/TYPE	DAYS USED	KWH	BILL KWH
04/13/2004	ELECTRIC SERVICE		\$292.05								
04/13/2004	Regular Bill	04/29	\$2169.55	\$1877.50			0831/0000	34201A	32	2516	14.5000
05/12/2004	ELECTRIC SERVICE		\$201.72								
05/12/2004	Regular Bill	05/28	\$2371.27	\$2169.55			0264/0031	35831A	29	1630	13.0000
06/11/2004	ELECTRIC SERVICE		\$160.31								
06/11/2004	Regular Bill	06/29	\$2531.58	\$2371.27			0077/0094	37072A	30	1241	13.5000
07/13/2004	ELECTRIC SERVICE		\$193.00								
07/13/2004	Regular Bill	07/29	\$2724.58	\$2531.58			0045/0126	38549A	32	1477	17.0000
08/12/2004	ELECTRIC SERVICE		\$165.86								
08/12/2004	Regular Bill	08/30	\$2890.44	\$2724.58			0021/0146	39905A	30	1356	10.0000
09/13/2004	ELECTRIC SERVICE		\$103.69								
09/13/2004	Regular Bill	09/29	\$2994.13	\$2890.44			0008/0123	40691A	32	786	10.0000
10/05/2004	Payment		\$-956.88								
10/05/2004	Late Payment Charge		\$4.89								
10/13/2004	ELECTRIC SERVICE		\$113.65								
10/13/2004	Regular Bill	10/29	\$2155.79	\$2037.25			0212/0010	41568A	30	877	10.0000
10/19/2004	Payment		\$-500.00								
10/19/2004	Payment		\$-500.00								
10/19/2004	CONF FEE ELEC		\$15.00								
11/04/2004	Late Payment Charge		\$5.36								
11/11/2004	ELECTRIC SERVICE		\$236.46								
11/11/2004	Regular Bill	11/29	\$2412.61	\$1155.79			0541/0000	43738A	29	2170	10.0000
11/17/2004	Payment		\$-1176.15								
12/03/2004	Payment		\$-256.82								
12/13/2004	ELECTRIC SERVICE		\$397.36								
12/13/2004	Regular Bill	12/29	\$377.00				0807/0000	47835A	32	4097	10.5000
01/04/2005	Late Payment Charge		\$13.11								
01/13/2005	Payment		\$-390.50								
01/13/2005	CANCELED ELECTRIC SERVICE		\$605.04								
01/13/2005	Regular Bill	01/31	\$604.65				1118/0000	53698A	31	5863	18.5000
02/02/2005	Adjustment		\$-605.04								
02/02/2005	Billing Adjustment		\$608.21								
02/04/2005	Payment		\$-372.77								
02/11/2005	ELECTRIC SERVICE		\$793.98								
02/11/2005	Regular Bill	03/01	\$1029.03				1268/0000	61077A	29	13242	23.0000
03/08/2005	Late Payment Charge		\$31.42								

Account At 0

Illegal

Reversed

Illegal Change

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: AUGUST 19, 2005

MOTORSPORTS-
MARKETING.COM, INC.
Complainant

VS.

Complaint Docket
No: C-20054946

PPL ELECTRIC UTILITIES
CORPORATION
Respondent

DOCUMENT
FOLDER

DOCKETED
AUG 18 2005

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: PPL ELECTRIC UTILITIES CORPORATION

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

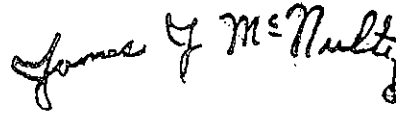
1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265**, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: AUGUST 19, 2005

C-20054946

PPL ELECTRIC UTILITIES CORPORATION
PAUL E RUSSELL GEN COUNSEL
TWO N 9TH ST
ALLENTOWN PA 18101-1179

DOCUMENT
FOLDER

Dear Sir/Madam:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by MOTORSPORTS-MARKETING.COM, INC.. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

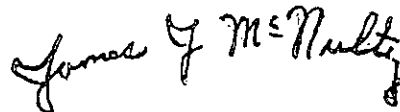
AUGUST 19, 2005

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

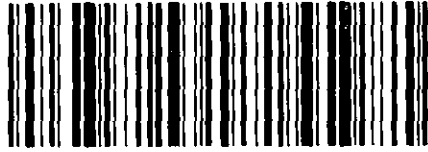
Very truly yours,

A handwritten signature in black ink that reads "James J. McNulty". The signature is written in a cursive style with a large, stylized "J" and "M".

James J. McNulty
Secretary

JH

2. Article Number



7160 3901 9843 0728 9560

3. Service Type CERTIFIED MAIL

4. Restricted Delivery? (Extra Fee)

C-20054946 FC
PPL ELECTRIC UTILITIES CORPORATION
PAUL E RUSSELL, GENERAL COUNSEL
TWO NORTH 9TH STREET
ALLENTOWN PA 18101-1179

RJA

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

8-19

C. Signature

X

Roehly

Agent

Addressee

D. Is delivery address different from item 1?
If YES, enter delivery address below:

Yes

No

GROSS, MCGINLEY, LABARRE & EATON, LLP

MALCOLM J. GROSS
PAUL A. MCGINLEY
DONALD LABARRE, JR.
J. JACKSON EATON, III
MICHAEL A. HENRY
PATRICK J. REILLY
WILLIAM J. FRIES
ANNE K. MANLEY
SUSAN ELLIS WILD
VICTOR F. CAVACINI
ELIZABETH R. GRAVER
ROBERT A. ALPERT
JOHN F. GROSS
KIMBERLY G. KRUPKA
K. A. SPOTTS-KIMMEL
ERROL C. DEANS, JR. *
ANDREW H. RALSTON, JR

ATTORNEYS AT LAW
33 SOUTH SEVENTH STREET
P.O. BOX 4060
ALLENTOWN, PENNSYLVANIA 18105-4060

(610) 820-5450
TELEFAX (610) 820-6006
E-MAIL kkrupka@gmle.com
Direct number: (610) 871-1325

DOCUMENT
FOLDER

RECEIVED

SEP 8 2005

September 8, 2005

VIA FEDERAL EXPRESS

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Post Office Box 3265, 400 North Street
Harrisburg, PA 17105-3265

ORIGINAL

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**RE: MotorSports-Marketing.com, Inc. v. PPL Electric Utilities Corporation
Docket No. C-20054946**

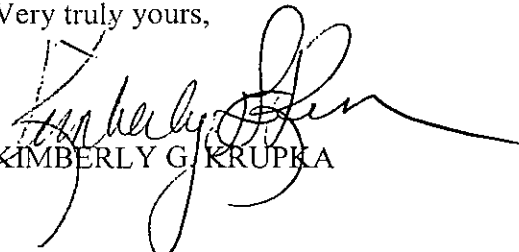
Dear Mr. McNulty:

Enclosed for filing in the above-captioned matter are an original and three (3) copies of the Answer of PPL Electric Utilities Corporation.

Pursuant to 52 Pa. Code §1.11, the enclosed document is deemed to be filed on September 8, 2005 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:es

Enclosures

cc: MotorSports-Marketing.com, Inc. (w/ encls.)
Diedre Bilger (w/ encls.)

RJ

DOCUMENT FOLDER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MOTORSPORTS-MARKETING.COM, INC.
Complainant

vs.

PPL ELECTRIC UTILITIES CORPORATION,
Respondent.

COMPLAINT DOCKET
NO. C-20054946

RECEIVED

SEP 8 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

ANSWER OF PPL ELECTRIC UTILITIES CORPORATION

PPL Electric Utilities Corporation (PPL), by its attorney, hereby Answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Admitted.

DOCKETED
SEP 13 2005

4. A. Denied. Complainant has alleged "Other" with regard to his Complaint. This allegation without further explanation is too vague to permit Respondent PPL to form an answer.

B. Denied. PPL denies any accounting irregularities. The documents attached to Complainant's Complaint do not show any irregularities. PPL denies it charged a \$600.00 fee to cancel electric service. By way of further response, on January 13, 2005, PPL issued a charge in the amount of \$605.04, which was thereafter removed on February 2, 2005. By way of further response, all other inferences set forth in the Complainant's allegations are denied. Strict proof of the same is demanded at the time hearing.

5. Paragraph 5 constitutes a request for relief to which no Answer is required. To the extent a response is required, PPL incorporates by reference herein the averments set forth in its Answer to Paragraph 4 of the Complaint.

6. Paragraph 6 constitutes a request for relief to which no Answer is required. To the extent a response is required, PPL incorporates by reference herein the averments set forth in its Answer to Paragraph 4 of the Complaint.

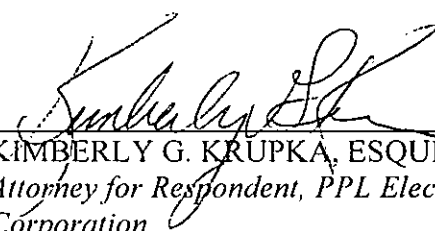
7. Admitted.

WHEREFORE, in view of the foregoing, PPL respectfully requests that the Commission deny the above-captioned Complaint.

Respectfully submitted,

GROSS, MCGINLEY, LABARRE & EATON, LLP

BY:


KIMBERLY G. KRUPKA, ESQUIRE
Attorney for Respondent, PPL Electric Utilities Corporation

Dated: September 8, 2005
In Allentown, Pennsylvania

RECEIVED

SEP 8 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MOTORSPORTS-MARKETING.COM, INC.

Complainant

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET
NO. C-20054946

CERTIFICATE OF SERVICE

This is to certify that ANSWER of PPL ELECTRIC UTILITIES CORPORATION TO THE COMPLAINT OF MOTORSPORTS-MARKETING.COM, INC. was mailed by first class United States mail, postage on this the 8th day of September, 2005.

MotorSports-Marketing.com, Inc.
RR #2 Box 2019
Beach Lake, PA 18405

GROSS, McGINLEY, LaBARRE & EATON, LLP

By: 

KIMBERLY G. KRUPKA, ESQUIRE

I.D.# 83071

Counsel for Defendant, PPL Electric Utilities
Corporation

33 South 7th Street

P.O. Box 4060

Allentown, PA 18105

Phone (610) 820-5450

Fax (610) 820-6006

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