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John J. Brazil Jr.

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January 9, 2013

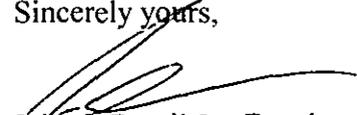
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
PO Box 3265
Harrisburg, PA 17105

RE: Moscow Sewer Authority v. PPL Electric Utilities Corporation
Docket No. C-2012-2335937

Dear Ms. Chiavetta:

Enclosed please find the Reply to PPL Electric Utilities Corporation's Answer. If you have any questions, feel free to contact this office.

Sincerely yours,



John J. Brazil Jr., Esquire
JJB/kgb
enclosures

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MOSCOW SEWER AUTHORITY :
Complainant :

v. :
: Docket No. C-2012-2335937
PPL ELECTRIC UTILITIES CORPORATION :
Respondent :
:
:
:

REPLY OF THE MOSCOW SEWER AUTHORITY
TO THE ANSWER OF PPL ELECTRIC UTILITY CORPORATION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Moscow Sewer Authority, the Authority, by and their its attorney, John J. Brazil, Jr., files this Reply to the Answer of PP&L Electric and responds as follows:

PP&L in its Answer denies that the Complainant contacted PP&L Electric on the morning of October 30, 2012 and further indicated that the PP&L logs indicated that the first contact with the customer did not occur until October 31, 2012. That information is incorrect. On the morning of October 30, 2012, the plant manager contacted PP&L via his cell phone. The use of his cell phone was required as there were no working phones at the plant. The plant manager's cell phone number is 570-430-7254. In addition, on October 31, 2012, the plant manager again called PP&L and this time not from his own phone but from the Moscow Borough Building phone as there were no working lines within the Moscow Sewer Authority plant. The number for the Moscow Borough Building is 570-842-1699 .

The purpose of these complaints were to advise PP&L of the serious and dangerous condition occurring at the plant and the potential for serious environmental damage.

WHEREFORE, the Moscow Sewer Authority requests appropriate action from the Public Utility Commission.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Brazil, Jr.', written over a horizontal line.

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Pennsylvania Attorney I.D No. 35508

MOSCOW SEWER AUTHORITY :
Complainant

vs. :

PPL ELECTRIC UTILITIES
CORPORATION :
Respondent

Docket No. C-2012-2335937

CERTIFICATE OF SERVICE

I, JOHN J. BRAZIL, JR., ESQUIRE, DO HEREBY CERTIFY that I have served a copy of Plaintiff's Reply to Defendant's Answer, in the above captioned case, on the date, on the person, and in the manner indicated.

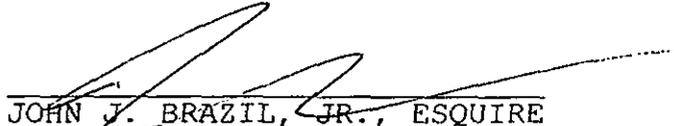
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17 N. Second Street
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DATE: 1-9-13

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