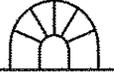


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May 12, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Post Office Box 3265, 400 North Street
Harrisburg, PA 17105-3265

RE: Theresa Brown-Albert v PPL Electric Utilities Corporation
Docket No: F-2013-2342492

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is an original of the Reply of PPL Electric Utilities Corporation to Complainant, Theresa Brown-Albert's Exceptions, along with the attached Certificate of Service.

Pursuant to 52 Pa. Code §1.11, the enclosed document is to be deemed eFiled on the date as indicated above.

Thank you for your cooperation in this matter.

Very truly yours,



KIMBERLY G. KRUPKA

KGK/dm
Enclosure

cc: Theresa Brown-Albert (w/enclosure)
Administrative Law Judge Dennis Buckley (w/enclosure); *via email only*
Kimberly R. Safford (w/enclosure); *via email only*

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Theresa Brown-Albert	:	
	:	
v.	:	F-2013-2342492
	:	
PPL Electric Utilities Corporation	:	

**RESPONDENT PPL ELECTRIC UTILITIES CORPORATION'S REPLIES TO
COMPLAINANT'S EXCEPTIONS**

AND NOW Comes the Respondent, PPL Electric Utilities Corporation (hereinafter "PPL Electric") by and through its counsel, Gross McGinley, LLP, files the following Replies to Complainant's Exceptions and in support thereof avers as follows:

1) Reply to Exceptions Number 1 and 2.¹ Complainant, Theresa Brown-Albert, contends that she failed to receive timely notice of the hearing. Such allegation is contradictory to the evidence of record. On February 4, 2013, the Office of Administrative Law Judge established March 13, 2013 as the date of the initial hearing. There is no evidence that the Notice of Hearing was not delivered to Complainant. Thereafter, on February 12, 2013, the ALJ issued a standard form Prehearing Order. Again, there is no evidence of record that such Prehearing Order was returned to the Commission as undeliverable or otherwise was not properly provided to Complainant. According, the Commission provided proper and timely notice of the hearing to Complainant.

¹ Complainant has filed Exceptions with numerous "bullet points", each of which refer to multiple Exceptions. PPL Electric responds utilizing Complainant's numbering system.

In addition to the notice being provided by the Commission, PPL Electric provided notice to Complainant through telephone calls and the provision of proposed exhibits. On March 5, 2013, PPL electric mailed exhibits to Complainant via Federal Express for overnight delivery, which stated the date and time for the hearing in the cover letter. Finally, as acknowledged by Complainant in her own Exceptions, Counsel for PPL Electric spoke with Complainant prior to the hearing and discussed the hearing with her. Accordingly, Complainant was accorded additional notice of the hearing.

Finally, it must be noted that Complainant participated in the hearing and offered into evidence six (6) exhibits. Clearly, Complainant was provided with due process.

2) Reply to Exceptions Number 2, 3, 4 & 5. Complainant excepts to the Exhibits of PPL Electric claiming the same are altered or otherwise inaccurate. There is simply no evidence of record that PPL Electric has altered any records in any manner. In addition, Complainant's Exceptions do not state any manner in which the records are inaccurate or altered.

3) Reply to Exceptions Number 1-5. Complainant appears to except to the finding of the Administrative Law Judge that she is responsible for the bill that accumulated for electric service provided to 3985 Locust Grove Road, Columbia, Pennsylvania. Complainant testified that this property is a single family home informally divided into multiple apartments with three separate meters. Complainant thereafter argues that as these meters/accounts were in the names of other family members while she, Complainant, was residing within the house, Complainant should not be responsible for the outstanding balances on the accounts.

Complainant's contention is contradictory to the law. Complainant herself clearly testified that 3985 Locust Grove Road, Columbia, Pennsylvania is a single family residence that was never used as an apartment complex. (N.T. at 8-9 (emphasis added)). Complainant further testified that the first floor of the residence was used at one time by her mother-in-law. (N.T. at 12, 18, 26-27). In exchange for occupying a portion of the home, Complainant's mother-in-law assumed responsibility for the meter which serviced account number 19090-97113. (Complainant's Exhibit 3). During the relevant time, Complainant was living at the premises with her husband Troy Donielle Albert, who had service in his name with account number 19090-97142. At all times, Complainant was residing in the single family home. Although Complainant and her mother-in-law may have had an informal agreement about the payment of bills, PPL Electric was never bound to such agreement.

Thereafter Complainant's mother-in-law passed away and Complainant's husband vacated the premises. When Complainant placed the electric service in her name, the balances from accounts 19090-97113 and 19090-97142 were properly transferred into Complainant's name. 52 Pa. Code § 56.16(b).²

4) Reply to Exception Number 4. Complainant appears to argue that PPL Electric should be required to seek payment from the Estate of her mother-in-law and her husband. However, Act 201, also known as the Responsible Utility Customer Protection Act, permits PPL Electric to seek payment from any adult individual residing in the home at the time the service was provided. As Ms. Brown-Albert admits to residing within the

² "In the event of discontinuance or termination of service at a residence or dwelling in accordance with this chapter, a public utility may transfer an unpaid balance to a new residential service account of the same customer." 52 Pa. Code § 56.16(b).

single family dwelling at the time the charges were incurred, Ms. Brown-Albert remains responsible for the same.

Respectfully submitted,

GROSS MCGINLEY, LLP



By: _____

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Attorneys for PPL Electric Utilities Corporation

Dated: May 12, 2014
at Allentown, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Theresa Brown-Albert	:	
	:	
v.	:	F-2013-2342492
	:	
PPL Electric Utilities Corporation	:	

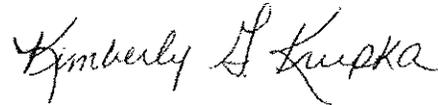
CERTIFICATE OF SERVICE

This is to certify that the **RESPONDENT PPL ELECTRIC UTILITIES CORPORATION'S REPLY TO COMPLAINANT'S EXCEPTIONS** on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record THERESA BROWN-ALBERT, on behalf of Respondent by first class United States mail, postage on this the 12th day of May 2013.

THERESA BROWN-ALBERT
3985 LOCUST GROVE ROAD
COLUMBIA, PA 17512

ADMINISTRATIVE LAW JUDGE DENNIS BUCKLEY
COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265
HARRISBURG, PA 17105-3265

GROSS MCGINLEY, LLP



By: _____

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