

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ASHLEY HARPLE

v.

PENNSYLVANIA ELECTRIC COMPANY

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Docket No. C-2014-2434701

**ANSWER TO PETITION FOR INTERIM EMERGENCY ORDER**

AND NOW comes the Complainant, Ashley Harple, and files the within Answer to the Petition for Interim Emergency Order by Pennsylvania Electric Company and in support thereof sets forth the following:

1. In answer to the averments contained in Respondent's Petition for Interim Emergency Relief paragraphs 1 through 8, the Complainant has filed a Reply to the New Matter averments of the Respondent which are incorporated herein in response to many of the averments contained in the Petition and specifically alleges an ongoing complaint with a dispute on amounts owed or charges. Furthermore asserts the Complainant is not abusing the protections of the Commission's Rules & Practices but is using this process for an adjudication to which she is entitled. Complainant is informed and believes that she has acted within the Rules of the Commission as provided and continues to request the opportunity to be heard before this Honorable Court. The essential basis argued by Respondent is that Complainant is abusing the system although following lawful process in pursuing her Complaint. Allegations of abuse are not true and without foundation.

2. The averments to paragraphs 9 through 11 jurisdiction are admitted.

3. Paragraphs 12 through 15 set forth portions of the Pennsylvania Code and statute and require no response.

4. In answer to the averments contained in paragraphs 16 through 19 standard for interim emergency relief, contain portions of the Pennsylvania Code, statute and case law to which no response is required as they are conclusions of law.

5. In answer to paragraphs 20 and 21, Complainant alleges that there continues to be a dispute as to current charges based upon Complainant's Exhibits comparing them to the breakdown offered by the Respondent as shown in Attachment No. 4.

6. In answer to paragraphs 22 and 23, Complainant believes that she is entitled to relief with the opportunity to be heard before a decision and enforcement of the balance allegedly owed is determined. Complainant denies that Pennsylvania Electric needs for the relief as requested.

7. In answer to paragraphs 24 and 25, Complainant believes the Court must weigh the injury to the public interest as opposed to those interests that the Complainant has to pay bills which are in dispute. Complainant seeks the opportunity to be heard, in a timely fashion, or any allegations set forth. The Complainant denies that she unlawfully or otherwise improperly.

8. In answer to Paragraph 26, Complainant avers that her private rights are, under the circumstances to be protected, entitle her to a fair hearing in contrast to the broad argument of general public interest.

WHEREFORE, the Complainant denies the averments set forth in the Petitioner's request for Emergency Relief.

Respectfully Submitted

MARGOLIS EDELSTEIN

By: 

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JAMES S. EHRMAN, ESQUIRE

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **ANSWER TO PETITION FOR INTERIM EMERGENCY ORDER** was served upon all counsel of record as follows on this \_\_\_\_ day of September, 2014 as follows:

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