

Jay Larry Moyer
370 W. Johnson street (C-1)
Philadelphia, PA 19144
267-693-2633
Gtown73@hotmail.com

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2015 DEC 14 AM 10:45

PA.P.U.C.
SECRETARY'S BUREAU

November 9, 2015

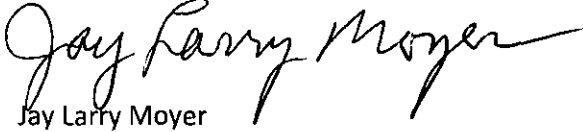
Ms. Rosemary Chiavetta, Secretary
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Docket No. C-2015-2511904

Dear Secretary Chiavetta:

Please find enclosed a copy of a request for Discovery in the above case. A Certificate of Service is enclosed.

Yours Sincerely,


Jay Larry Moyer

Jay Larry Moyer
370 W. Johnson Street (C-1)
Philadelphia, PA 19144
215-844-8224
Email: gtown73@hotmail.com

December 9, 2015

Christopher T. Wright (ID #203412)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

RE: Docket No. C-2015-2511904

Dear Mr. Wright:

Pursuant to 52 Pa. Code § 5.331, the Complainant in the above case requests that PPL Electric Utilities Corporation provide discovery materials as described in the interrogatories which are numbered below. Please provide in discovery all materials for the period of April 21, 2015, to the present. Please include the following:

1. Copies of all letters, emails, and other written communication that occurred between the Complainant and individuals acting on behalf of PPL Electric Utilities Corporation (PPLEU), including persons who may have been employed by third-party entities.
2. Audio recordings of all telephone conversations that occurred between the Complainant and individuals acting on behalf of PPL Electric, including the following specific conversations:
 - a. A conversation between the Complainant and "Anna" on October 7, 2015 (c. 12:15 p.m.)
 - b. A second conversation between the Complainant and "Anna" on October 7, 2015 (c. 12:40 p.m.)
 - c. A conversation between the Complainant and "Eli" on October 7, 2015 (c. 2:07 p.m.)
 - d. A conversation between the Complainant and "Marissa" on October 7, 2015 (c. 2:25 p.m.)

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- e. A conversation between the Complainant and "Mae" on October 7, 2015 (c. 2:57 p.m.)
 - f. A follow-up conversation with "Mae" on October 7, 2015 (c. 3:40 p.m.)
 - g. A conversation between the Complainant and "Marjorie" on October 22, 2015, in a call which was transferred to "Stephanie" (in collections).
 - h. A conversation with "Stephanie" on October 22, 2015.
 - i. A follow-up conversation with "Marjorie", after being transferred back from "Stephanie".
 - j. A conversation between the Complainant and "Tyler" on November 3, 2015 (c. 10:00 a.m.)
 - k. A conversation between the Complainant and "Monica" on November 9, 2015 (c. 10:20 p.m.)
 - l. A conversation between the Complainant and "Tammy" on December 2, 2015.
3. All memos, comments, letters, customer service records (CSR's), "histories", and/or notations (whether in printed, digital, or audio format) that are related to conversations between the Complainant and employees or agents of PPL Electric, including any materials that have been received, prepared, maintained, consulted, or cited by Customer Service Representatives.
4. Audio recordings of any and all telephone conversations related to the Complainant that occurred between employees of PPL electric and/or individuals acting as agents of PPL Electric.
5. Copies of all emails, audio recordings, and other correspondence related in any way to the Complainant.
6. All drawings, graphs, charts, photographs, etc. related in any way to the Complainant.
7. All records of interactions related to the Complainant which may have occurred between the Office of Administrative Law Judge and employees or agents of PPL Electric.
8. All records of interactions related to the Complainant which may have taken place between the staff of Administrative Law Judge Cynthia Williams Fordham and employees or agents of PPL Electric.


9. All records of interactions related to the Complainant which may have taken place directly between Administrative Law Judge Cynthia Williams Fordham and employees or agents of PPL Electric.

10. All records of interactions related to the Complainant which may have occurred between employees of the Public Utility Commission and employees or agents of PPL Electric.

11. All records, memos, notes, and other materials in the possession of PPL Electric that pertain to deliberations, recommendations, characterizations, or other discussions related to the Complainant .

Thank you for your response to this request.

Sincerely,

A handwritten signature in black ink that reads "Larry Moyer". The signature is written in a cursive style with a large, sweeping initial "L".

Larry Moyer

Certificate of Service

Request for Discovery

RE: Docket No. C-2015-2511904

I hereby certify that I have this day served a request for discovery upon the Respondent in the above case, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

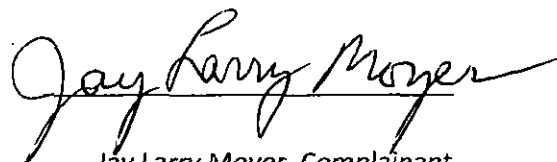
Via USPS

Rosemary Chiavetta, Secretary
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
(Served via USPS)

Christopher T. Wright, Esquire
Post & Schell PC
17 North Second Street, 12th floor
Harrisburg, PA 17101-1601
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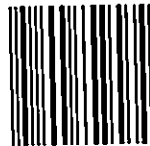


Jay Larry Moyer, Complainant
370 W. Johnson Street
Philadelphia, PA 19144
267-693-2633

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370 W. Johnson Street (C-1)
Philadelphia, PA 19144



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Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

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