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December 23, 2015

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor North
P. O. Box 3265
Harrisburg, Pennsylvania 17120

Re: Docket No. C-2015-2511904

Secretary Chiavetta,

This letter is in Reply to the Motion of PPL Electric Utilities Corporation to stay Discovery pending a ruling on the Company's Preliminary Objections.

The request for Discovery should be permitted to proceed based on the clear evidence of misconduct by the Company.

The above Complaint addresses questions of misconduct in the Company's dealings with the Complainant and in its dealings with other parties since the Formal Hearing on April 21, 2015. In this regard, PPL Electric's reference to the above-referenced Complaint as a "Third Complaint" is misleading and makes an improper association with previous Complaints. Earlier Complaints involved questions of "eligibility" and "billing" as they pertain to virtual meter aggregation.

The Company insinuates that the above-captioned Complaint involves the same issues as earlier Complaints and is merely an extension that is directly related to them. The insinuation is inaccurate, since the above Complaint was prompted by phone calls claiming the Complainant's case had been closed and by written Notices from the Company which threatened to shut off electric service to the Complainant's aggregated accounts. The basis for the above Complaint is separate and independent from any previous Complaints. The "further evidence of misconduct" cited in the Complaint (Item # 3) is related to improper phone calls and shut-off Notices and does not refer to issues of eligibility or billing.

In addition, the exact content of the numerous phone conversations is available only through the Company's records. The Complainant does not "have them in his possession", as the Company claims (Objections to Interrogatories at 3, et al). Neither the memory of the Complainant nor that of the Respondent should be relied on for accuracy.

The Company, in fact, admitted misconduct even while attempting to dismiss it as "inadvertent". Recordings of conversations between the Complainant and individuals representing the Company will help to determine whether the improper actions were truly "inadvertent", as the Company claims, or specifically authorized.

The Company concedes that it improperly threatened to shut off electric service to both of the Complainant's aggregated accounts. The Company also admits that it failed to maintain a "litigation hold" on the Complainant's accounts. Notably, in the weeks since those admissions, Company representatives have continued to bombard the Complainant with repeated telephone calls pressing for payment, including one from "Candy" on December 14, 2015.

Based on the Company's own admission, the case should be permitted to proceed without a Stay or further delay. The merits of the above Complaint are clear and the request for Discovery materials is well-founded. The Commission should proceed with a fair, impartial, and reasoned response to the Complaint, and should not be delayed by the Company's Motion to Stay Discovery.

The Complainant therefore respectfully requests that the Motion to Stay Discovery be denied.

Respectfully Submitted,

Jay Larry Moyer

Encl: Certificate of Service