

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

January 7, 2016

Christopher T. Wright (ID #203412)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> 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 that the Company may have received or may have taken possession of during the period from April 21, 2015, to the above date. 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.)

- 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.
- m. A conversation on or about December 4, 2015, between a male caller and my wife, Marilyn M. Moyer who received while I was absent.
- n. A call from “Candy” on December 14, 2015, pressing me for payment of an electric bill.

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, other images, 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,

Larry Moyer