

Before the
Pennsylvania Public Utility Commission

Michael Scotto)	
)	
Complainant,)	
)	
vs.)	
)	
PPL Electric Utilities)	FILE NO. C-2015-2514519
)	
Corporation)	
)	
Respondent)	
)	
)	
)	
)	
)	

Petition for Injunction

Administrative Law Judge
Katrina L Dunderdale
Piatt Place Suite 220
301 Fifth Ave
Pittsburgh PA 15222

Your Honor,

As the complainant, pro-se in this case, I wish to formally petition this honorable court for an Injunction applicable to the Respondent in the matter of a proposed shutoff now threatened by the Respondent and to temporarily thwart the Respondent's threatened action until the PUC has made its decision. Said decision regarding the financial directives is directly relevant to this case for the following reasons.

1. Again, that the Complainant did receive a "10 day shutoff notice" dated February 2nd, 2016 on Saturday February 6th 2016 via USPS first class mail. This notice specifically regards the matter that has been brought forth in this action by the Complainant against the Respondent placed before the PUC.

2. That the Respondent does intend to harass, intimidate, and, through bullying tactics, does attempt to make the Complainant withdraw his action before the PUC without the benefit of this honorable court's system of justice within the Commonwealth of Pennsylvania.

3. That receiving the "Shut Off notice" a mere 6 days before the threatened action is unusual in that USPS mail delivery from Allentown to South Heidelberg takes one or two days the most. When was the letter mailed? Said "late delivery" was a willful and knowing attempt to once again harass and befuddle the Complainant.

4. That the matter of Payment to the Respondent has indeed been placed before the PUC in this action in that the Complainant maintains that the agreement made between the Respondent and the Complainant was not honored by the Respondent regarding the CAP program and in the Complainant's subsequent dealings with the Respondent.

5. Furthermore, the Respondent did attempt to confuse, befuddle and dupe the complainant in his energy usage by means of sending him false statements as to his energy consumption, thus,

deliberately misguiding the Complainant in his reasonable and prudent usage of the CAP program which was breached by the Respondent.

6. Therefore, said shutoff is by definition placed before the PUC to decide as the Complainant still contends he should be by rights and contractual definition, still be on the CAP program.

7. Said "shutoff notice" was sent to the Complainant without any recent warnings or notice while this matter was placed before the PUC.

8. Said "shutoff notice" was not sent in compliance with PUC regulations regarding this matter.

9. Furthermore, a shutoff would render the Complainant's residence without any form of heat since even the gas burner in the house requires electricity to circulate throughout the house.

10. That a shutoff would be in violation of the PUC regulations regarding the shutoff of a heating system in the Complainant's residence during the winter months.

11. That a shutoff would render the Complainant's safety vulnerable since the telephone system works via the internet and is dependent upon electricity in order to function properly.

12. That the Complainant would not have any form of recourse to defend himself by a telephonic communication with the PUC on the new date of the hearing.

13. That the shutoff of the electricity the Complainant residence would leave the Complainant vulnerable regarding his health condition.

14. That imposing this Injunction upon the Respondent will have no ill effect financially upon the Respondent with an annual revenue in 2014 for the year ended December 31, 2014:

	Kentucky	Pennsylvania	U.K.
Operating Revenues (in billions)	\$ 2.6	\$ 3.2	\$ 2.0
Net Income Attributable to PPL Shareowners	\$ 982M	\$ 312M	\$ 263M

At December 31, 2014:

Regulatory Asset Base (in billions)	\$ 9.5	\$ 8.3	\$ 4.9
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(source: <http://www.pplweb.com/wp-content/uploads/2015/03/PPL-Corporation-Annual-Report-2014.pdf>)

15. In Addition to these statistics the Respondent has recently been granted a rate increase by the PUC.

Dated this 8th day of February, 2016

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