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February 16, 2016

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

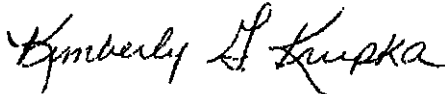
**RE: Michael Scotto v. PPL Electric Utilities Corporation**  
**Docket No: C-2015-2514519**

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is the Answer of PPL Electric Utilities Corporation to Petition for Injunction Filed by Complainant, Michael Scotto.

Please note that this filing was eFiled with the Commission on the date indicated above.

Very truly yours,



KIMBERLY G. KRUPKA

KGK:ejm  
Enclosure

cc: Michael Scotto (w/enc.)  
Amy M. Bellizia (w/enc.) *via email only*  
Kimberly R. Hanson (w/enc.) *via email only*

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MICHAEL SCOTTO,  
  
COMPLAINANT,  
  
VS.  
  
PPL ELECTRIC UTILITIES CORPORATION,  
  
RESPONDENT.

COMPLAINT DOCKET  
  
NO. C-2015-2514519

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO  
PETITION FOR INJUNCTION FILED BY COMPLAINANT, MICHAEL SCOTTO**

AND NOW, the Respondent, PPL Electric Utilities Corporation (PPL Electric), by its counsel, Gross McGinley, LLP, files the following response, and in support of thereof avers as follows:

1. Admitted in part, denied in part. By way of further response, on February 2, 2016, Respondent, PPL Electric, mailed a 10-Day Shut Off Notice to Complainant advising Complainant that his electric service may be terminated on or after 8 AM on April 2, 2016, thus providing Complainant with a full two month notice of intent to terminate service. By way of further response, the past due amount for which the notice was issued was for non-disputed amounts incurred after the date on which Complainant filed a PUC Complaint. Denied that Respondent is attempting to collect on any disputed balance. Rather, the amount set forth in the notice correlates only to the December 4, 2015 and January 1, 2016 bills.

2. Denied. It is specifically denied that Respondent, PPL Electric intends to harass, intimidate, or bully Complainant. By way of further response, Complainant has failed to pay

current bills since his Complaint was filed. In addition, certain Customer Assistance Programs are available only to individuals who have a valid termination notice. Accordingly, such termination notice enables customers to apply for various Customer Assistance Programs and government assistance. Moreover, the notice clearly indicates that PPL Electric will not take action until at least April 2, 2016.

3. Denied. It is specifically denied that the Shut Off Notice was received only six days before the threatened termination. By way of further response, the shut off notice which was attached to Complainant's Motion clearly sets forth a date of termination being on or after April 2, 2016.

4. Denied that Complainant is not responsible for his current electric bills during pendency of a PUC Complaint.

5. Denied. It is specifically denied that Respondent sent confusing, befuddling, or inappropriate bills or statements to Complainant. All bills issued were in accordance with PUC guidelines and regulations.

6. Denied. It is specifically denied that Complainant is relieved of the right of paying current bills during the pendency of a PUC Complaint.

7. Denied. It is specifically denied that Complainant is relieved of the right of paying current bills during the pendency of a PUC Complaint.

8. Denied. It is specifically denied that PPL Electric is precluded from issuing termination notices for unpaid balances accumulated during the pendency of a Complaint.

9. Admitted in part, denied in part. Answering Respondent is without sufficient information to admit or deny whether Complainant has alternate forms of heat. By way of

further response, the termination notice clearly sets forth a date of termination of on or after April 2, 2016.

10. Admitted in part, denied in part. Answering Respondent is without sufficient information to admit or deny whether Complainant has alternate forms of heat. By way of further response, the termination notice clearly sets forth a date of termination of on or after April 2, 2016.

11. Admitted in part, denied in part. Answering Respondent is without sufficient information to admit or deny whether Complainant has alternate forms of heat. By way of further response, the termination notice clearly sets forth a date of termination of on or after April 2, 2016.

12. Denied. By way of further response, Answering Respondent is without sufficient information to admit or deny any allegations with regard to Complainant's access to a telephone. However, again, the termination notice sets forth a termination note of on or after April 2, 2016.

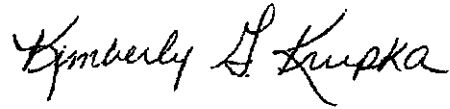
13. Admitted in part, denied in part. Answering Respondent is without sufficient information to admit or deny whether Complainant has alternate forms of heat. By way of further response, the termination notice clearly sets forth a date of termination of on or after April 2, 2016.

14. Denied. By way of further response, Answering Respondent is not precluded from termination of a customer's electric service during the pendency of a PUC Complaint when Complainant fails to pay current bills. By way of further response, the termination notice establishes a termination date of on or after April 2, 2016. Moreover, this termination notice permits a customer to attempt to avail him or herself of Customer Assistance Programs and government aid.

15. The allegations of this paragraph have no relevance to the instant action.

Respectfully submitted,

GROSS MCGINLEY, LLP



BY: \_\_\_\_\_

KIMBERLY G. KRUPKA, ESQUIRE  
*Attorney for Respondent, PPL Electric Utilities  
Corporation*

Dated: 02/16/16  
In Allentown, Pennsylvania

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MICHAEL SCOTTO,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

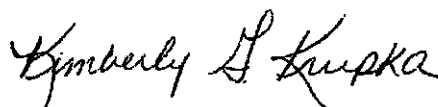
NO. C-2015-2514519

**CERTIFICATE OF SERVICE**

This is to certify that the ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO PETITION FOR INJUNCTION FILED BY COMPLAINANT, MICHAEL SCOTTO, on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record on behalf of Respondents by First Class United States Mail, postage on this the 16<sup>th</sup> day of February 2016:

MICHAEL SCOTTO  
19 CARRIAGE DRIVE  
WERNERSVILLE PA 19565

GROSS MCGINLEY, LLP



By: \_\_\_\_\_  
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