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June 9, 2016

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

RE: Tyise Ballard v PPL Electric Utilities Corporation
Docket No: F-2015-2521323

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter are the Replies on behalf of PPL Electric Utilities Corporation, to Complainant's Exceptions.

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: Tyise Ballard (w/ enc.)
Administrative Law Judge Elizabeth H. Barnes (w/enc.); *via email only*
Amy M. Bellizia; (w/enc.); *via email only*

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

TYISE BALLARD,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. F-2015-2521323

**PPL ELECTRIC UTILITIES CORPORATION'S REPLIES
TO EXCEPTIONS OF COMPLAINANT, TYISE BALLARD**

AND NOW, comes the Respondent, PPL Electric Utilities Corporation ("PPL Electric") by and through its attorney of record, Gross McGinley, LLP, and files the within Replies to Exceptions, alleging in support thereof as follows:

1. Denied. Complainant fails to set forth her Exceptions in numbered paragraphs and further fails to identify with particularity any Conclusions of Law to which she excepts. Nonetheless, it appears that Complainant excepts to the Initial Decision of Administrative Law Judge Barnes to the extent the decision finds "there are no incorrect charges currently on the account" and PPL Electric will respond accordingly. (Initial Decision, pg. 1).

Ms. Ballard does not deny being a customer of PPL Electric and receiving service from PPL Electric commencing September 2, 2014 at the apartment she rented on Adler Street, Hazleton, Pennsylvania. Rather, it appears that Ms. Ballard raises concerns as to whether she was billed on the correct meter. An investigation revealed that the home in which Complainant resided was a single home divided into three apartments (one on each of the three floors) all with different meters. Although Ms. Ballard was initially billed on the incorrect meter at the time of

connect in September 2014, following a full investigation Complainant was rebilled for actual usage for the meter connected to the apartment in which she was residing. It is for that usage PPL Electric seeks to hold Complainant responsible, and for which the ALJ found proper.

The house in which Ms. Ballard resided contained two sides, one with the address of 797 Atler Street and one with the address of 799 Atler Street. (The property has a formal address of 797-799 Atler Street, Hazleton, PA 18201; PPL Hearing Exhibit 5). However, despite the house having "two sides", it was divided into three apartments based on floor (level) such that mailing address 799 corresponds to the apartment on the entire first floor, 799 ½ corresponds to the second floor and 797 corresponds to the third floor. FOF 6, N.T. 17, PPL Hearing Exhibit 5. Ms. Ballard testified that she believes that she lived at 799 Atler Street, and when PPL Electric connected Complainant at her request in September 2014, PPL Electric began charging Complainant for the service provided to 799 Atler Street, but on the first floor. (See PPL Hearing Exhibit 2A, contact of 09-02-2014 where Complainant requested connect at 799 Atler Street).

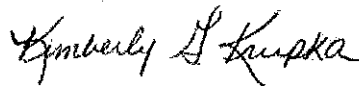
However, in March 2013 it was discovered by PPL Electric that a prior ratepayer was still residing in the apartment connected to the meter servicing 799 Atler Street (First Floor). While Complainant testified she resided at 799 Atler Street, she was clear that she lived on the third floor. When PPL Electric became aware of the concerns related to this property and the three meters servicing the apartments, it conducted an inperson investigation to confirm the meter numbers and ratepayers. At this time, it was confirmed that meter 12227854 serviced the third floor apartment within the home. Unfortunately, the meter investigation information notes that the house owner had incorrectly marked the meter base. It was further confirmed that the first floor (799 Atler Street) was connected to meter number 60775692 and the second floor (799 ½

Atler Street) was connected to meter number 123954269. PPL Hearing Exhibit 6, pg. 1. Upon this confirmation, PPL Electric issued a corrected bill to Complainant for the electric service accumulated on meter number 12227854 from September 3, 2014 through February 26, 2015, and credited the account for all payments made by Ms. Ballard during this time (totaling \$541.75). PPL Hearing Exhibit 2A.

The home in which Complainant resided had a confusing address of 797-799 Atler Street, Hazleton, PA. PPL Hearing Exhibit 5. At the time of connect, Ms. Ballard provided a service address of 799 Atler Street. PPL Hearing Exhibit 2A. Due to the manner in which the owner had marked the meter bases, the meter marked 799 was servicing the first floor and the meter marked 797 was servicing the third floor. This unfortunate sequence of events led to Ms. Ballard being billed on the incorrect meter. However, upon confirmation of the concern, PPL Electric performed an in-person investigation and confirmed the meter number servicing the third floor apartment in this home with the address of 797-799 Atler Street. There is no dispute that Ms. Ballard lived in the third floor. Accordingly, PPL Electric properly issued a corrected billing in accordance with Section 56.14 of the Commission's regulations. Both the Findings of Fact and the Conclusions of Law of ALJ Barnes are correct in those respects.

For the foregoing reasons, it is respectfully requested that the Commission deny Complainants' Exceptions.

GROSS MCGINLEY, LLP



BY: _____

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Date: 06/09/16

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

TYISE BALLARD,

Complainant,

vs.

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COMPLAINT DOCKET

NO. F-2015-2521323

CERTIFICATE OF SERVICE

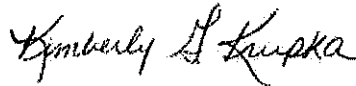
This is to certify that the Reply to Claimant's Exceptions on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record on behalf of Respondents by first class United States mail, postage on this the 9th day of June, 2016.

Administrative Law Judge Elizabeth H Barnes

Via Email Only ebarnes@pa.gov

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