

From: Ross E. Schell
203 Knollwood Drive
Harrisburg, Pa 17109
717-651-0824

Notice of Preliminary Objections to Pleadings made under 52
5.61 and 5.62. I am there for answering these pleadings with the
following:

It is past the 20 day mark on all these complaints.

5.101. Preliminary objections.

To PPL new Matter Filings. As false

5.102. Motions for summary judgment and judgment on the
pleadings.

Motion for immediate judgement on these pleadings.

5.103. Motions.

To reject all pleadings by PPL and their attorney as misguided
judgement on the part of their Attorney.

GENERAL PROVISIONS

§ 5.1. Pleadings allowed.

(a) The pleadings in an action before the Commission include the following:

(1) Application and protest.

(2) Formal complaint, answer, new matter and reply to new matter.

(3) Order to show cause and answer.

(4) Petition and answer.

(5) Preliminary objections.

(6) Motions.

(b) A pleading except a preliminary objection may be subject to a preliminary

Objection as set forth in § 5.101 (relating to preliminary objections).

I object to the pleadings of new matter in the following ways.

C-2016-2558239 is About them violating laws 52 SS 56.71 and 52 SS 6.72 which is still part of the reliability issue. As far as a Payment Agreement with PPL they may call, \$1700.00 down and \$435.00 a month a good and just payment agreement. I do not.

And since we cannot e file pictures in PDF for on the PUC web site. I cannot provide the pictures of this.

C-2016-2539969 This complaint is about PPI Controlling my Meters rate of spin hence bill problems. These two complaints are not the same

C-2016-2557856 is about PPI using the wrong criteria for figuring income for a payment agreement. Again this is a reliability issue as well as a bill issue.

C-2016-2539969 Is totally different from this complaint. The rest of my Complaints yet they keep mentioning it.

C-2016-2557858 this complaint is regrading them reading my meter as required by law. Which they never did, Hence the reliability issue in the complaint.

C-2016- 25547863 Is about their improperly reading or estimating my meter reading. Hence Reliability issue.

Also part of my complaints are the fact that PPI keeps ignoring me when I say my electricity shut off and on as if I was in third world Nation. Even though they summited evidence that, this is happening at a phone hearing earlier this year.

All my complaints are legitimately made or the PUC would have rejected them. Therefore it is the Job of the Puc and PPL to fully investigate a complaint



Ross E. Schell

08/14/2016



Kimberly G. Krupka

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Lehighon, PA 18235
Phone: 610/377-0500

August 11, 2016

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

RE: Ross E. Schell v. PPL Electric Utilities Corporation
Docket No: C-2016-2557863

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is a Notice to Plead, Answer and New Matter on behalf of PPL Electric Utilities Corporation.

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: Ross E. Schell (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

ROSS E. SCHELL,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. #C-2016-2557863

ANSWER OF PPL ELECTRIC UTILITIES CORPORATION

PPL Electric Utilities Corporation (PPL Electric), by its attorney, hereby Answers Complaint in the above-captioned proceeding as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Denied. PPL Electric denies that it has improperly threatened to terminate service. Rather, Complainant has an outstanding balance and has failed to make monthly payments on the same. Denied that Complainant has any reliability, safety, or quality problems. All other allegations are denied.

5. Paragraph 5 constitutes a request for relief to which no Answer is required. To the extent a response is required PPL Electric incorporates by reference herein the averments set forth in its Answer to Paragraph 4 of the Complaint.

6. No response of answering Respondent is required, as the allegations of this paragraph do not pertain to answering Respondent.

7. Admitted.

PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. C-2016-2557863

NOTICE TO PLEAD

TO: ROSS E. SCHELL
203 KNELLWOOD DR
HARRISBURG PA 17109

PURSUANT TO 52 PA. CODE SECTION 5.62 AND 5.63, YOU ARE HEREBY NOTIFIED THAT YOU HAVE TWENTY (20) DAYS FROM THE DATE OF SERVICE OF THE WITHIN NEW MATTER IN WHICH TO ANSWER, AND THAT IF YOU FAIL TO SO ANSWER WITHIN TWENTY (20) DAYS FROM THE DATE OF SERVICE, RESPONDENT'S NEW MATTER MAY BE GRANTED WITHOUT FURTHER NOTICE.

RESPECTFULLY SUBMITTED,



BY: _____

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

Dated: 08/11/16
In Allentown, Pennsylvania

WHEREFORE, in view of the foregoing, PPL Electric respectfully requests that the Commission deny the above-captioned Complaint.

NEW MATTER

8. PPL Electric incorporates all the averments set forth in paragraphs 1 through 7 above as New Matter.

9. Complainant, Ross E. Schell, currently has a pending action at docket number C-2016-2552834 which addresses reliability issues.

10. Complainant currently has an action pending at docket number C-2016-2539969 which addresses concerns regarding the utility threatening to terminate service, seeking a payment arrangement, alleging incorrect charges on his bill, alleging reliability and safety issues, and other related issues.

11. Complainant's current complaint is barred by the doctrine of prior pending action.

12. Complainant's current complaint is barred by the doctrine of res judicata.

WHEREFORE, in view of the foregoing, PPL Electric respectfully requests that the Commission deny the above-captioned Complaint.

Respectfully submitted,

GROSS MCGINLEY, LLP



BY: _____

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

Dated: 08/11/16
In Allentown, Pennsylvania

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NO. #C-2016-2557863

CERTIFICATE OF SERVICE

This is to certify that the ANSWER 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 11th day of August, 2016:

ROSS E. SCHELL
203 KNELLWOOD DR
HARRISBURG PA 17109

GROSS MCGINLEY, LLP

Kimberly G. Krupka

By: _____

KIMBERLY G. KRUPKA, ESQUIRE

I.D. # 83071

Counsel for Defendant, PPL Electric Utilities Corporation

33 South 7th Street, P.O. Box 4060

Allentown, PA 18105

Phone (610) 820-5450

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Lehigh, PA 18235
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August 11, 2016

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

RE: Ross E. Schell v. PPL Electric Utilities Corporation
Docket No: C-2016-2557858

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is a Notice to Plead, Answer and New Matter on behalf of PPL Electric Utilities Corporation.

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: Ross E. Schell (w/ enc.)
Amy M. Bellizia (w/ enc.) *via email only*
Kimberly R. Hanson (w/ enc.) *via email only*

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

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RESPECTFULLY SUBMITTED,



BY: _____

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

Dated: 08/11/16
In Allentown, Pennsylvania

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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VS.

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COMPLAINT DOCKET

NO. C-2016-2557858

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1. Admitted.

2. Admitted.

3. Admitted.

4. Denied. PPL Electric denies that it has improperly threatened to terminate service. Rather, Complainant has an outstanding balance and has failed to make monthly payments on the same. Denied that Complainant has any reliability, safety or quality problems. All other allegations are denied.

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Respectfully submitted,

GROSS MCGINLEY, LLP



BY: _____

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

Dated: 08/11/16
In Allentown, Pennsylvania

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ROSS E. SCHELL
203 KNELLWOOD DR
HARRISBURG PA 17109

GROSS MCGINLEY, LLP



By: _____
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