

06 October 2016

To: The Pa Public Utility Commission Secretary  
400 North Street  
Harrisburg, PA 17120

From: Ross E. Schell  
203 Knollwood Drive  
Harrisburg, PA 17109-5515  
PH# 717-651-0824  
Fax# same but call First.

C-2016-2566320

To Whom this may Concern

This is in answer to the Answer I received in the mail yesterday from MS. Kimberly G. krupka regarding the aforementioned Docket Number.

4. They have been braking the laws listed on my complaint since I moved in on July 29<sup>th</sup> 1999. It has been proven that the power has gone off and on at my house over a hundred times over the last I guess they think that the power going on and off it good safe service. Every time that happens the Alarm and camera systems

I have on my house must reboot and for at least 15 minutes my house is left with no protection. I have to reset them to record after each one. So there is a loss of recording time each time.

I have been told that I need to purchase batter back up for my electronics. Well if PPI wants to pay for them then so be it. As far

As third party people installing a backup power system I live in Lower Paxton Township and they would fight me on it all the way as well as the neighbor I have who likes to call them and the police for no reason. To the tune of 110 times over the last 4 years yet no one can tell me why. Just like PPL even though they have admitted that my power is interrupted they cannot tell me why. So I think they do not conform in any way to the laws I have written in the complaint Docket number C-2016-2566320.

5. Since I have been paying for first World service and been getting third world service I think a little compensation is do in this matter.

Furthermore since they have not conformed to the Answer part of the law that there answer should be denied and my complaint should continue As written.



Ross. E. Schell

**§ 5.61. Answers to complaints, petitions, motions and preliminary objections.**

(a) *Time for filing.* Unless a different time is prescribed by statute, the Commission, or the presiding officer, answers to complaints and petitions shall be filed with the Commission within 20 days after the date of service.

(1) Answers to motions shall be filed within the 20 days provided by §§ 5.102 and 5.103 (relating to motions for summary judgment and judgment on the pleadings; and motions).

(2) Answers to preliminary objections shall be filed within the 10 days provided by § 5.101 (relating to preliminary objections).

(b) *Form of answers to complaints.* The answer must be in writing and: (1) Set forth in paragraphs numbered to correspond with the complaint. (2) Advise the parties and the Commission as to the nature of the defense. (3) Admit or deny specifically all material allegations of the complaint. (4) State concisely the facts and matters of law relied upon.

**(5) Include a copy of a document, or the material part of a document when relied upon in the answer. If the writing or a copy is not available, the answer must set forth that the document is not available and the reason, and set forth the substance of the document.**

(c) *Failure to file an answer to a complaint.* A respondent failing to file an answer within the applicable period may be deemed in default, and relevant facts stated in the pleadings may be deemed admitted.

(d) *Answers to complaints in rate proceedings.* For complaints which are docketed with Commission-instituted rate proceedings, an answer may be filed within 10 days of date of service.

However, an answer is not required, except as may be directed by the Commission or the presiding officer.

(e) *Form of answers to petitions.* The answer must be in writing and:

(1) Advise the parties and the Commission of the parties' position on the issues raised in the petition.

## Certificate Of Service

I do Herby Certify That I have This Day 06 October 2016 I Have Served a true And correct copy of the Answer to PPL's answer form 03 October 2016 upon The person's and manner Set Forth Below.

Via Fax Answer to answer of Complaint

Kimberly G. Krupka

33 S Seventh Street

P.O. box 4060

Allentown, PA 18105-4060

The Honorable Jeffery A. Watson

Piatt Place

Suite 200

301 5<sup>th</sup> Avenue

Pittsburg, Pa 15222 undeliverable



Ross E. Schell

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**Lehighon Office**  
415 Mahoning Street  
Lehighon, PA 18235  
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October 3, 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-2016-2566320**

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is the Answer 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**

00903020.DOCX

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. C-2016-2566320

**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. Answering Respondent denies that it has broken any laws with regard to the provision of services to Complainant. More specifically, it is denied that the provisions attached to Complainant's Complaint are applicable. Specifically, it is denied that PPL Electric failed to provide adequate, efficient, safe, and reasonable service. 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.

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: 10/03/16  
In Allentown, Pennsylvania

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. C-2016-2566320

**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 3<sup>rd</sup> day of October, 2016

ROSS E. SCHELL  
203 KNELLWOOD DR  
HARRISBURG PA 17109

GROSS MCGINLEY, LLP



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

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