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October 31, 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 Nos: C-2016-2557856; C-2016-2557863; C-2016-2557858; and
C-2016-2558239

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is the Answer to the Motion for Reconsideration 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: Administrative Law Judge Jeffrey A. Watson (w/ enc.); *via email only*
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

ROSS E. SCHELL,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. C-2016-2557856
C-2016-2557863
C-2016-2557858
C-2016-2558239

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO RESPONDENT'S
MOTION FOR RECONSIDERATION**

PPL Electric Utilities Corporation (PPL Electric), by its attorney, hereby Answers Respondent's Motion for Reconsideration¹ in the above-captioned proceeding as follows:

1. Admitted, denied in part. By Notice dated September 6, 2016, the above captioned four (4) cases were scheduled for an Initial Telephonic Hearing before Administrative Law Judge Watson for October 19, 2016 at 10:00 a.m. Thereafter, a Prehearing Order dated September 8, 2016, reaffirmed the date and time for hearing, along with providing instructions as to the method by which to request a continuance and directions for mailing (not filing) proposed exhibits. In accordance with the Prehearing Order, Counsel for PPL Electric submitted by mail (never filed), proposed exhibits, again setting forth in the cover letter the date and time set for the hearing. Within the "re line" of this letter, PPL Electric inadvertently transposed the last two digits of one of the four docket numbers (transposing the 6 and 3 in docket number C-2016-

¹ Procedurally, Complainant's Motion for Reconsideration is premature as no Order has been entered. Moreover, the proper procedure is for the filing of Exceptions after an Initial Decision is entered. However, out of an abundance of caution, Respondent files its response.

2557863). Again, in accordance with the Prehearing Order, PPL Electric did not file this letter or proposed exhibits.

With regard to all four Complaints filed by Complainant, PPL Electric filed timely Answers using the appropriate docket numbers. In fact, all filings by PPL Electric used correct docket numbers. It was only the “re line” of one cover letter that transposed the last two numbers of one docket.

The hearing remained scheduled for October 19, 2016 at 10:00 a.m. At no time after receiving Respondent’s exhibits did Respondent contact the PUC to inquire about any confusion. At no time did Complainant call counsel for PPL Electric to inquire whether the hearing remained as scheduled, nor did Complainant ever call to inquire as to Respondent’s position on a continuance (as is required before even seeking a continuance from the Administrative Law Judge). Had Complainant suffered any confusion, he certainly could have contacted the PUC, the Administrative Law Judge, or Counsel for Respondent. Simply filing a letter with the Commission to lodge objections to proposed exhibits is not satisfactory to seek a continuance of a hearing.

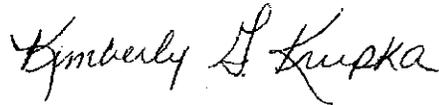
2. Denied. Complainant alleges that he thinks “the hearing should be cancelled” and in the same document alleges “I figured since the Docket number on all the papers were wrong the hearing on the 19th was cancelled.” This claim is inconsistent and lacks merit. The scheduling (as well as continuance of) any hearing can be performed only by the ALJ or Commission. It simply cannot occur through an inadvertent transposition of two numbers of a docket within a re: line of a non-filed letter. Moreover, three out of the four docket numbers on the letter were correct. If Complainant was confused, he took absolutely no action to confirm the date and time of the hearing.

3. Complainant's demand for confirmation that ALJ is actually signing the Court Orders is without merit. All parties received notice of the date and time of the hearing, both in the Initial Telephonic Hearing Notice and in the Prehearing Notice. Complainant himself does not dispute the same. Complainant simply has refused to comply with the requirements of service (by mail) and electronic filing.

WHEREFORE, Respondent respectfully requests Complainant's Motion for Reconsideration be denied.

Respectfully submitted,

GROSS MCGINLEY, LLP



BY: _____

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

Dated: 10/31/16
In Allentown, Pennsylvania

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. C-2016-2557856

C-2016-2557863

C-2016-2557858

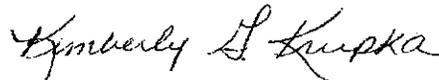
C-2016-2558239

CERTIFICATE OF SERVICE

This is to certify that the ANSWER TO COMPLAINANT'S MOTION FOR RECONSIDERATION 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 31st day of October, 2016:

ROSS E. SCHELL
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GROSS MCGINLEY, LLP



By: _____
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