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January 3, 2017

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-2016-2535220, C-2016-2538023, C-2016-2539969**

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: Administrative Law Judge Jeffrey A. Watson (w/enc.) *via email only*  
Ross E. Schell (w/enc.)  
Patricia L. Moore (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-2016-2535220

C-2016-2538023

C-2016-2539969

**PPL ELECTRIC UTILITIES CORPORATION'S REPLIES  
TO EXCEPTIONS OF COMPLAINANT, ROSS SCHELL**

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. As Complainant admits Finding of Fact No. 1, no response is required of Respondent, PPL Electric.
2. As Complainant admits Finding of Fact No. 2, no response is required of Respondent, PPL Electric.
3. As Complainant admits Finding of Fact No. 3, no response is required of Respondent, PPL Electric.
4. As Complainant admits Finding of Fact No. 4, no response is required of Respondent, PPL Electric.
5. As Complainant admits Finding of Fact No. 5, no response is required of Respondent, PPL Electric.
6. As Complainant admits Finding of Fact No. 6, no response is required of Respondent, PPL Electric.

7. Denied. Finding of Fact number 7, which states “[a]t the time of the hearing on July 20, 2016, complainant had an overdue balance of \$2,806.05” is supported both by the testimony of PPL Electric and Complainant’s Account Activity Statement, which was introduced as PPL Hearing Exhibit No. 1. (N.T. pg. 87, ln. 11-12)). Complainant has provided no evidence to the contrary and accordingly the ALJ relied upon substantial evidence in making this Finding of Fact.

8. Denied. Finding of Fact number 8, which states [t]he last time Complainant made a payment on his bill was in November of 2015” is supported both by the testimony of PPL Electric and Complainant’s Account Activity Statement, which was introduced as PPL Hearing Exhibit No. 1. (N.T. pg. 61, ln. 24 – pg. 62, ln. 1). When questioned, “Would you agree with me that the last time you made any payment on your PPL bill was in November of 2015?”, Complainant responded “Correct.” Complainant has provided no evidence to the contrary and accordingly the ALJ relied upon substantial evidence in making this Finding of Fact.

9. As Complainant admits Finding of Fact No. 9, no response is required of Respondent, PPL Electric.

10. PPL Electric neither admits nor denies this allegation. The Transcript of the July 20, 2016 hearing speaks for itself and clearly states on pg. 57, ln. 24 that Complainant testified that his home is 1175 square feet. By way of further response, whether the square footage of Complainant’s home is 1175 or 1075 does not materially affect the Findings of Fact or Conclusions of Law of the ALJ, and does not affect the decision of this case.

11. Denied. The allegations of the Complaint were limited to the momentary interruptions of electric during 2016. Moreover, Complainant was unable to provide any credible evidence concerning momentary interruptions of service prior to 2016, and accordingly the same cannot be considered. Moreover, Complainant testified that his concerns dating back to 1999 were not about reliability, but rather about PPL Electric's charges. (N.T. pg. 21,ln. 6-pg. 22, ln. 17; pg. 27, ln. 18-24; pg. 101, ln. 15-20; ).

12. Denied. PPL Electric provided the testimony of Michael Hadginske, an electric engineer with PPL Electric, who clearly testified that upon investigation into the momentary outages, it was determined that the most likely cause was trees within the general vicinity of the lines, and for that reason, PPL Electric accelerated the planned tree trimming which lead to a reduction in momentary outages. (N.T. pg. 78, ln. 11-18).

13. Denied. Complainant's allegations are not contained within the testimony of the July 20, 2016 Initial hearing before ALJ Watson, and therefore should not be considered by the Commission. By way of further response, Michael Hadginske, PPL Electric electrical engineer, testified that the lines are trimmed on a four year basis. (N.T. pg. 78, ln. 21-23). Complainant offered no evidence to the contrary, and as such the Finding of Fact of the ALJ is supported by substantial evidence.

14. Denied. Michael Hadginske, PPL Electric electrical engineer, testified that PPL Electric advanced the work on the lines and would be completed within several weeks of the hearing. (N.T. pg. 79, ln. 2-4). Complainant offered no evidence to the contrary, and as such the Finding of Fact of the ALJ is supported by substantial evidence.

15. Denied. PPL Electric confirmed that while there were "trouble calls", which are not calls by a customer, the Complainant never called PPL between 2014 and

2016 to complain of any outages. PPL Electric confirmed: There have been no reliability or outage specific calls by the customer”, and Complainant confirmed that he does not regularly call to report his outages. (N.T. pg. 63, ln. 25 – pg. 63, ln. 8; pg.80, ln. 5-6).

16. Neither admitted nor denied as Complainant does not deny the Finding of Fact of the ALJ. As stated in the testimony, Complainant last contacted PPL Electric concerning reliability on July 11, 2014. (N.T. pg. 80, ln. 5-6).

17. Denied. PPL Electric’s electrical engineer confirmed that momentary outages cannot cause a meter to run faster. (N.T. pg. 80, ln. 7-9). Complainant provided no contrary evidence. As such, the Finding of Fact of the ALJ is supported by substantial evidence.

18. Denied. Complainant has an AMR meter, and such meters were not in existence with PPL Electric in 1999. All meters were placed between 2002 and 2003. (N.T. 80, ln. 19-22). As such, the Finding of Fact of the ALJ is supported by substantial evidence.

19. Denied. The testimony of PPL Electric is clear that readings are performed through the electric wires which provide actual hourly reads. (N.T. pg. 80, ln. 25 – pg. 81, ln. 2). As such, the Finding of Fact of the ALJ is supported by substantial evidence.

20. Denied. PPL Electric’s electrical engineer testified that PPL Electric cannot make a meter run faster or slower, and that the meter is controlled based solely on the customer’s usage. (N.T. pg. 81, ln. 3-8). Complainant provided no testimony of any competent witness to the contrary. As such, the Finding of Fact of the ALJ is supported by substantial evidence.

21. Denied. Mr. Hadginske testified he is a senior electrical engineer for PPL Electric Utilities with a Bachelor's of Science in electrical engineering and a minor in physics. He further testified he is a reliability engineer with PPL Electric for the Harrisburg area. (N.T. pg. 73, ln. 4-21). As such, the Finding of Fact of the ALJ is supported by substantial evidence.

22. Denied. It is denied that the Finding of Fact indicates that Mr. Hadginske physically performed the meter test, but rather he caused it to be performed. Such is supported by the testimony of Mr. Hadginske. (N.T. pg. 74, 81).

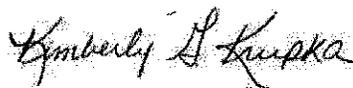
23. No response of Respondent is required as Complainant agrees with the Finding of Fact.

24. No response of Respondent is required as Complainant agrees with the Finding of Fact.

25. Denied. By way of further response, Complainant himself testified that he rejected the payment plans offered by PPL Electric despite long term nonpayment of his bills. (N.T. pg 62, ln. 2-24).

26. No response of Respondent is required as this is not an Exception to any Finding of Fact or Conclusion of Law.

GROSS MCGINLEY, LLP



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

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Date: January 3, 2017

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,

COMPLAINANT,

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COMPLAINT DOCKET

NO. C-2016-2535220

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**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 3<sup>rd</sup> day of January, 2017.

Administrative Law Judge Jeffrey A. Watson  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105  
**VIA EMAIL ONLY**

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GROSS MCGINLEY, LLP



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

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