



**Graig M. Schultz**

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**Leighton Office**  
415 Mahoning Street  
Leighton, PA 18235  
Phone: 610/377-0500

February 1, 2017

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

**RE: Moyer's Grove Campground v. PPL Electric Utilities Corporation**  
**Docket No: C-2017-2583962**

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is the Preliminary Objections of PPL Electric Utilities Corporation. The Answer was filed on February 1, 2017 at 2:53:49. A copy of the Confirmation Email of Filing is attached.

Pursuant to 52 Pa. Code §1.11, the enclosed Preliminary Objections are deemed to be eFiled on the date as indicated above.

Very truly yours,

GRAIG M. SCHULTZ

GMS/ejm  
Enclosures

cc: Moyer's Grove Campground c/o Todd Edward Lightner, Owner (w/enc.)  
Patricia L. Moore (w/enc.) *via email only*  
Kimberly R. Hanson (w/enc.) *via email only*  
Holly M. Groth (w/enc.) *via email only*  
Shelbie Frederick Bayda (w/enc.) *via email only*

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PUBLIC UTILITY COMMISSION

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Your filing has been electronically received. Upon review of the filing for conformance with the Commission's filing requirements, a notice will be issued acknowledging such compliance and assigning a Docket Number. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

Print this page for your records. The date filed on will be the current day if the filing occurs on a business day before or at 4:30 PM Harrisburg, PA time. It will be the next business day if the filing occurs after 4:30 PM Harrisburg, PA time or on weekends or holidays.

***If your filing exceeds 250 pages, you are required to submit one paper copy of the filing within 3 business days of submitting the electronic filing. This paper copy can be mailed to: Secretary, Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, 2nd Floor, Harrisburg, PA 17120 . Please print a copy of this page and attach it to the paper copy of your filing as the first page.***

eFiling Confirmation	
Docket Number:	C-2017-2583962
Description:	Answer
Transmission Date:	2/1/2017 2:53:49 PM
Filed On:	2/1/2017 2:53:49 PM
eFiling Confirmation Number:	1664972

**Uploaded File List**

File Name	Document Class	Document Type
Chiavetta enclose Answer - MOYER'S GROVE CAMPGROUND (00946854x9F954).pdf	Communication	Answer to Formal Complaint

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MOYERS GROVE CAMPGROUND,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. F-2017-2583962

**NOTICE TO PLEAD**

**To: MOYERS GROVE CAMPGROUND  
C/O TODD EDWARD LIGHTNER  
309 MOYERS GROVE ROAD  
WAPWALLOPEN, PA 18660**

Pursuant to 52 Pa. Code § 5.101(b), you are hereby notified that you have ten (10) days from the date of service of the within PRELIMINARY OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION within which to file a written answer with the Secretary of the Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17120, and that if you fail to so file a written answer within ten (10) days from the date of service, Respondent's Preliminary Objections may be granted without further notice.

Dated: February 1, 2017

By: 

Graig M. Schultz (I.D. No. 207123)  
GROSS MCGINLEY, LLP  
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Allentown PA 18105-4060  
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Attorneys for Respondent:  
PPL Electric Utilities Corporation

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MOYERS GROVE CAMPGROUND,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. F-2017-2583962

**PRELIMINARY OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION**

PPL Electric Utilities Corporation (“Respondent PPL Electric”), by and through its attorneys of record, Gross McGinley, LLP, hereby raises the following Preliminary Objections to the Complaint of Moyers Grove Campground (“Complainant”), pursuant to 52 Pa. Code § 5.101, and in support thereof, alleges as follows:

1. Respondent PPL Electric hereby incorporates those averments set forth in its Answer and New Matter contemporaneously filed in the above-captioned case as if more fully set forth at length.
2. Complainant filed a Complaint against Respondent PPL Electric alleging that it experienced reliability, safety and quality problems with its electric service. *See* Complaint at ¶¶ 4-5, as well as attachment thereto, which is attached hereto as **Exhibit “A”**.
3. Complainant has also requested that Respondent PPL Electric be made to reimburse it for various costs which were allegedly incurred by Complainant. *Id.*
4. Preliminary objections are properly filed by a respondent when the complaint is legally insufficient. 52 Pa. Code § 5.101(a)(4).

5. The provision at 52 Pa. Code § 5.101(a)(4) serves judicial economy by avoiding a hearing where no factual dispute exists. If no factual issue pertinent to the resolution of a case exists, a hearing is unnecessary. *See Lehigh Valley Power Committee v. Pennsylvania Public Utility Commission*, 563 A.2d 557, 564 (Pa. Cmwlth. 1989).

6. Preliminary objection practice before the Public Utility Commission (the “Commission”) is analogous to Pennsylvania civil practice regarding preliminary objections. *Equitable Small Transportation Intervenors v. Equitable Gas Company*, No. C-00935435, 1994 WL 932315, at \*1 (Pa. P.U.C. July 18, 1994).

7. Preliminary objections in civil practice requesting dismissal of a pleading will be granted only where the right to relief is clearly warranted and free from doubt. *Interstate Traveller Services, Inc. v. Pa. Dept. of Environment Resources*, 406 A.2d 1020, 1022 (Pa. 1979). The Commission follows this standard. *See Montague v. Philadelphia Electric Company*, 0088 WL 1534888, 66 Pa. PUC 24 (Pa. P.U.C. January 6, 1988).

8. The Commission may not rely upon the factual assertions of the moving party but must accept as true for purposes of disposing of the motion all well pleaded, material facts of the nonmoving party, as well as every inference from those facts. *Commonwealth of Pennsylvania v. Bell Telephone Co. of Pa.*, 551 A.2d 602, 604 (Pa. Cmwlth. 1988).

9. Given this, the Commission must view the complaint in the light most favorable to the complainant and should dismiss the complaint only if it appears that the complainant would not be entitled to relief under any circumstances as a matter of law. *See Equitable Small Transportation Intervenors*.

10. The Commission regulations state that a person may file a formal complaint claiming a violation of a statute that the Commission has jurisdiction to administer. *See* 52 Pa. Code § 5.21(a)

11. Additionally, the regulations authorize the Commission to dismiss a complaint if a hearing is not necessary and authorizes preliminary objections to be filed in response to a complaint. *See* 52 Pa. Code § 5.21(d)

12. Complainant's Complaint specifically requests monetary damages in the amount of \$947.74. Complaint at ¶ 5.

13. It is well settled that the Commission may not exceed its jurisdiction and must act within it. *City of Pittsburgh v. Pennsylvania Public Utility Commission*, 43 A.2d 348, 350 (Pa. Super. 1945). In this regard, jurisdiction may not be conferred by the parties where none exists. *Roberts v. Martorano*, 235 A.2d 602, 604 (Pa. 1967) (citing *Commonwealth v. Yorktowne Paper Mills, Inc.*, 214 A.2d 203 (Pa. 1965)),

14. Additionally, subject matter jurisdiction is a prerequisite to the exercise of the power to decide a controversy. *See Hughes v. Pennsylvania State Police*, 619 A.2d 390, 392 (Pa. Cmwlth. 1992). As a creation of the legislature, the Commission possesses only the authority that the state legislature has specifically granted to it in the Public Utility Code. 66 Pa.C.S. §§ 101, *et seq.* Its jurisdiction must arise from the express language of the pertinent enabling legislation or by strong and necessary implication therefrom. *Feingold v. Bell*, 383 A.2d 791, 794 (Pa. 1977) (citing *Allegheny County Port Authority v. Pennsylvania Public Utility Commission*, 237 A.2d 602 (Pa. 1967) and *Delaware River Port Authority v. Pennsylvania Public Utility Commission*, 145 A.2d 172 (Pa. 1958)).

15. Most importantly, **the statutory array of Commission remedial and enforcement powers does not include the power to award damages to a private litigant** for breach of contract by a public utility. *Id.* (emphasis added). As a result, the Commission cannot award Complainant monetary damages as a result of Respondent's alleged actions.

16. As such, Complainant's request for monetary damages is legally insufficient, and therefore, must be denied and dismissed with prejudice.

WHEREFORE, Respondent PPL Electric respectfully requests that Complainant's request for monetary damages be dismissed with prejudice.

Dated: February 1, 2017

Respectfully submitted,



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

Graig M. Schultz (I.D. No. 207123)  
GROSS MCGINLEY, LLP  
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Attorneys for Respondent:  
PPL Electric Utilities Corporation

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MOYERS GROVE CAMPGROUND,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. F-2017-2583962

**CERTIFICATE OF SERVICE**

This is to certify that the PRELIMINARY OBJECTIONS on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record on behalf of Respondent by first class United States mail, postage on this the 1st day of February, 2017.

MOYERS GROVE CAMPGROUND  
C/O TODD EDWARD LIGHTNER  
309 MOYER'S GROVE RD  
WAPWALLOPEN PA 18660



By: \_\_\_\_\_  
GRAIG M. SCHULTZ, ESQUIRE  
Attorney ID # 207123  
Attorney for Respondent  
PPL Electric Utilities Corporation  
33 S. Seventh Street; P O Box 4060  
Allentown PA 18105-4060  
Ph. (610) 820-5450; Fax (610) 820-600

# **EXHIBIT “A”**

**From:** [Hanson, Kimberly R](#)  
**To:** [Moore, Patricia Lynn](#); [Groth, Holly M](#); [Bayda, Shelbie Frederick](#)  
**Subject:** FW: PA PUC eServe Notice  
**Date:** Thursday, January 12, 2017 12:01:13 PM  
**Importance:** High

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**From:** eServe@pa.gov[SMTP:ESERVE@PA.GOV]  
**Sent:** Thursday, January 12, 2017 12:00:42 PM  
**To:** Klock, Kimberly A  
**Cc:** Hanson, Kimberly R  
**Subject:** PA PUC eServe Notice  
**Importance:** High  
**Auto forwarded by a Rule**

Dear Kimberly A Klock,

A(n) **Formal Complaint** has been served in this proceeding. This document is docketed as **C-2017-2583962**. You may view this document at [Formal Complaint - Moyers Grove Campground](#)

You are receiving this email because you are a(n) **Respondent** for this case and have agreed to be served electronically. By selecting electronic service (eService), you have agreed that this notification constitutes valid service. Electronic service of any and all documents will be in place of paper service.

Thank You,  
Public Utility Commission  
Commonwealth of Pennsylvania

*\* Please do not respond to this automatically generated email.*

PENNSYLVANIA PUBLIC UTILITY COMMISSION

SB-2569517

Formal Complaint

Filing this form begins a legal proceeding and you will be a party to the case. If you do not wish to be a party to the case, consider filing an informal complaint.

To complete this form, please type or print legibly in ink.

1. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number. It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name Todd Edward Lightner (Moyer's Grove Campground)
Street/P.O. Box 309 Moyer's Grove Rd Apt #
City Wapuketa Open State PA Zip 18660
County Luzerne

Telephone Number(s) Where We Can Contact You During the Day:

(570) 379 3375 (home) (570) 881 1416 (mobile)

E-mail Address (optional):

Utility Account Number (from your bill) 31007 5240 (one of 6 accounts)

6 accounts with PPL
05840-31005 (Store)
05640-31009 (Golf)
05440-31003 (Hill)
05040-31001 (Sewer plant)
04840-31003 (Pavilion)
05240-31007 (House)

List of our accounts service provided to a different address or in a different location. Please list this information below.

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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

2. Name of the utility company about which you are complaining. The name of

PPL Electric Utilities

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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

3. Type of Utility Service

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- ELECTRIC                       WASTEWATER/SEWER  
 GAS                                       TELEPHONE/TELECOMMUNICATIONS (local, long distance)  
 WATER                                       MOTOR CARRIER (e.g. taxi, moving company, limousine)  
 STEAM HEAT

4. Reason for Complaint

What kind of problem are you having with the utility or company? Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. **Your complaint may be dismissed without a hearing if you do not provide specific information.**

- The utility is threatening to shut off my service or has already shut off my service.
- I would like a payment agreement.
- Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.
- I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important. *May 28, 2016 (See enclosed letter with our problem)*
- Other (explain). *Memorial Day Weekend 2016*

**Note:** If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

5. **Requested Relief**

**How do you want your complaint to be resolved?** Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

All we want and feel we deserve is the cost of the breakers, cost of the shipping and the A R C bill.

This was not our fault,

The fault lies with PPL

We should not have to pay for a problem that was not caused by us.

Fromme Electric ck# 5343 6/1/16 \$ 369.74 Breakers

ARC Electrical Const. Co. ck# 5442 7/27/16 \$ 470.

Replaced 2 defective breakers  
Shipping #108.

Can you please help us?

**Note:** The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

6. **Protection From Abuse (PFA)**

Has a court granted a "Protection From Abuse" order that is currently in effect for your personal safety or welfare? The PUC needs this information to properly process your complaint so that your identity is not made public.

**Note:** You must answer this question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a problem involving billing, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection From Abuse" order for your personal safety or welfare?

YES

NO

If your answer to the above question is "yes," attach a copy of the current Protection From Abuse order to this Formal Complaint form.

7. **Prior Utility Contact**

a. Is this an appeal from a decision of the PUC's Bureau of Consumer Services (BCS)?

YES

NO

**Note:** If you answered yes, move to Section 8. No further contact with the utility or company is required. If you answered no, answer the question in Section 7 b. and answer the question in Section 7 c. if relevant.

b. If this is not an appeal from a BCS decision, have you spoken to a utility or company representative about this complaint?

YES

NO

**Note:** You must contact the utility first if (1) you are a residential customer, (2) your complaint is against a natural gas distribution utility, an electric distribution utility or a water utility AND (3) your complaint is about a billing problem, a service problem, a termination of service problem, or a request for a payment agreement.

c. If you tried to speak to a utility company representative about your complaint but were not able to do so, please explain why. 5/31/16, 6/2/16, 6/16/16, 6/17/16

8/16/16, Nov 16, 16 Waited for Ron Hoffman 5704734272 PPL to return numerous calls to him. Never returned my calls.  
Andy Elliston - Engineer PPL 5704734272 finally returned a call & his response was that its not PPL fault. Its our problem because the transformer is on our property when it leaked. However we never installed this new transformer PPL did.

Note: Even if you are not required to contact the utility or company, you should always try to speak to a utility or company representative about your problem before you file a Formal Complaint with the PUC. We did but we were unsuccessful.

**8. Legal Representation**

If you are filing a Formal Complaint as an individual on your own behalf, you are not required to have a lawyer. You may represent yourself at the hearing.

However, if you are interested in receiving legal representation, you may contact the Widener Harrisburg Civil Law Clinic located at 3605 Vartan Way, Harrisburg, PA 17110, by phone at 717-541-0320 or via email at [lawclinicb@mail.widener.edu](mailto:lawclinicb@mail.widener.edu).

For additional information see Widener Harrisburg's Civil Law Clinic's website <http://law.widener.edu/Academics/ClinicalProgramsandProfessionalTraining/Clinics/HarrisburgCivilLawClinic.aspx>. Based on your income, legal representation may be available to you at no cost or a reduced fee.

If you are already represented by a lawyer in this matter, provide your lawyer's name, address, telephone number, and e-mail address, if known. Please make sure your lawyer is aware of your complaint. If represented by a lawyer, both you and your lawyer must be present at your hearing. We do not have a lawyer, we were asking for a mediator. Her name is Tiffany Hunt 717 787 3988. called administrators # 717 787 1399. But we still did not get help from any one.

Lawyer's Name \_\_\_\_\_

Street/P.O. Box \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Area Code/Phone Number \_\_\_\_\_

E-mail Address (if known) \_\_\_\_\_

Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.

Todd Edward Lightner formal Comp.  
Moyer's Grove Campground  
mm

9. **Verification and Signature**

**You must sign your complaint.** Individuals filing a Formal Complaint **must** print or type their name on the line provided in the verification paragraph below and **must** sign and date this form in **ink**. If you do not sign the Formal Complaint, the PUC **will not accept it**.

**Verification:**

I Todd Edward Lightner, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Todd Edward Lightner \_\_\_\_\_ 1-5-17  
(Signature of Complainant) (Date)

Todd Edward Lightner  
Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

**Note:** If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification **must** be signed by an authorized officer or authorized employee. If the Formal Complaint is **not signed** by one of these individuals, the PUC **will not accept it**.

10. **Two Ways to File Your Formal Complaint**

**Electronically.** You must create an account on the PUC's eFiling system, which may be accessed at <http://www.puc.pa.gov/efiling/default.aspx>.

**Note:** If you are appealing your Bureau of Consumer Services (BCS) decision, you must file your formal complaint by mail.

**Mail.** Mail the completed form with your original signature and any attachments, by certified mail, first class mail, or overnight delivery to this address:

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

**Note:** Formal Complaints sent by fax or e-mail will **not** be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your Formal Complaint for your records.

Sept. 19, 2016

On Saturday May 28, 2016 our Campground, "Moye's Grove Campground, 309 Moye's Grove Rd, in Hobbie, PA owned by Todd and Janet Lightner sole proprietors for 30 years, had a drop in voltage.

We went from 120-121 volts to 105-108 volts. This happens all the time in the summer for the past 30 years.

We have called PPL numerous times and they send out their service crew. The service crew found a transformer that they had installed leaking oil. They advised us that it has to be changed. I asked if it had to be changed immediately and they said it should.

Please note we have had this power drop from all 3 transformers locations in our campground.

They changed the transformer. When they energized the new transformer the power fed back

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PA P.U.C.  
SECRETARY'S BUREAU

to one of the 2 200AMP main breaker.

The PPL service crew said there was nothing they could do about it. It was our breaker, our problem.

Not having a replacement breaker we had 31 campers without power from Saturday afternoon, Sunday, Monday, Tuesday and Wednesday all during the Memorial Day Weekend.

Tuesday I ordered 2 new breakers from our local electric supply house.

I tried all the supply houses within a 30 mile radius and I got the same answer from all. We have to order them. We don't stock that kind of breaker.

We couldn't wait so I ordered 2 breakers and had them shipped overnight

costing \$131.00 per breaker and \$108.00 for shipping. The breakers

came in on Wednesday June 1st.

The sub contractor for PPL told me I could change the breakers, however,

I just have to call PPL so they could shut the power off.

(3)

PPL also told me I could not change the breakers unless I had an inspector come out and inspect and approve the installation so PPL could restore the power.

We didn't have the time to get our electric inspector in to do this.

We hired ARC electric to shut down the power.

They installed the breaker, their inspector inspected it and PPL restored the power.

We could not wait for PPL, so I did it because I've dealt with PPL in the past. I've put in new service, had it inspected, it took PPL 5 weeks to hook up the new power. We'd call PPL every day until they finally came. (imagine 5 weeks to wait until they hooked us up.)

This was the reason we hired an electrical contractor to do the work.

It had to be done now.

(4)

Our campers have refrigerators and some medical needs to run their equipment. Our campers did the best they could under the circumstances.

We apologized all Memorial Day Weekend for the inconvenience.

All we want and feel we deserve is the cost of the breakers, cost of the shipping and the ARC bill.

This was not our fault.

The fault lies with PPL.

We should not have to pay for a problem that was not caused by us.

Fromme Electric Ch#5343 6/1/16 \$369.74 Breakers

ARC Electrical Const. Co. Ch#5442 7/27/16 \$470.

Replaced 2 defective Breakers.

Shipping \$108.

Can you please help us.



Moyer's Grove Campground  
309 Moyers Grove Rd.  
Wapwallopen, PA 18660

LEHIGH VALLEY PA 180

06 JAN 2017 PM 4 L



*Secretary*  
*Pennsylvania Public Utility Commission*  
*400 North Street*  
*Shensburg PA 17120*

17120-007999

