

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SILVER VALLEY APARTMENTS,

Complainant,

vs

PPL ELECTRIC UTILITIES CORPORATION,

Respondent

COMPLAINT DOCKET

NO. C-2018-3000758

PA PUC
SECRETARY'S BUREAU

2018 MAY 31 AM 10:37

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**SILVER VALLEY APARTMENTS PRELIMINARY OBJECTIONS TO
PPL PRELIMINARY OBJECTIONS TO SILVER VALLEY
APARTMENTS REPLY TO ANSWER**

SILVER VALLEY APARTMENTS, COMPLAINANT, hereby objects to and replies to PPL preliminary objections:

1. PPL preliminary objections are in the nature of reply rather than preliminary objections and therefore should be stricken and dismissed.
2. PPL paragraph 5 is denied and/or denied as stated.
3. Rule 52 PA Code 5.101 speaks for itself.
4. Rule 52 PA Code 5.1(a) speaks for itself.
5. It is denied that Silver Valley Apartments reply is not recognized as a pleading pursuant to the provisions of the Code.
6. It is denied that Silver Valley Apartments new matter is not properly raised in its reply.
7. It is denied that Silver Valley Apartments failed to conform to the applicable provisions of the Code.
8. It is denied that Silver Valley Apartments Reply is improper and therefore should not be stricken.

WHEREFORE, Silver Valley Apartments respectfully requests Respondent's preliminary objections be stricken and dismissed with prejudice.

NEW MATTER

9. This case should be one of simply enforcing a previously agreed to payment agreement. However, PPL insists on entering into endless litigation and confusion and improper pleadings.

10. PPL should have settled this dispute without forcing it to go to the PUC at this time.

11. Therefore, the PUC should strike and dismiss PPL preliminary objections and grant the relief requested in Silver Valley Apartments complaint.

WHEREFORE, the PUC should strike and dismiss PPL preliminary objections and grant the relief requested in Silver Valley Apartments complaint.

DATE: 5/26/18

Silver Valley Apartments



Mike Vianello
258-1 Silver Valley Road
Saylorsburg, PA 18353

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CERTIFICATE OF SERVICE

This is to certify that the FOREGOING PRELIMINARY OBJECTIONS AND REPLY on behalf of SILVER VALLEY APARTMENTS was mailed to counsel for PPL by first class United States mail.

26 May 2018



Mike Vianello

VERIFICATION

I, Mike Vianello, hereby certify that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and/or belief) and that I expect to be able to prove the same at a hearing held in this matter.

Mike Vianello



26 May 2018

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SILVER VALLEY APPTS
258-1 Silver Valley Rd
Saylorsburg PA 18353

LEHIGH VALLEY PA 180

29 MAY 2015 13:41



PENNSYLVANIA PUBLIC UTILITY COMMISSION
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