

Teresa Harrold, Esq.
(610) 921-6783
(330) 315-9263 (Fax)

July 11, 2018

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**Re: Lindsey Adams v. Pennsylvania Electric Company
Docket No. C-2018-3001175**

**Lindsey Adams v. Pennsylvania Electric Company
Docket No. C-2018-3001447**

Dear Secretary Chiavetta:

Enclosed please find the Motion for Consolidation of Complaints of Pennsylvania Electric Company regarding the above-referenced matters. This document has been served on the Complainant as shown in the Certificate of Service.

Please contact me if you have any questions regarding this matter.

Very truly yours,



Teresa Harrold

Enclosures

c: As Per Certificate of Service
Benjamin Myers, Administrative Law Judge
Joel Cheskis, Administrative Law Judge

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LINDSEY ADAMS	:	
	:	
v.	:	Docket No. C-2018-3001175
	:	
PENNSYLVANIA ELECTRIC COMPANY	:	

LINDSEY ADAMS	:	
	:	
v.	:	Docket No. C-2018-3001447
	:	
PENNSYLVANIA ELECTRIC COMPANY	:	

**MOTION OF PENNSYLVANIA ELECTRIC COMPANY
FOR CONSOLIDATION OF COMPLAINTS**

AND NOW, Pennsylvania Electric Company (“Penelec” or the “Company”), by and through Teresa Harrold, pursuant to Section 5.81 of the Pennsylvania Public Utility Commission’s (“Commission’s”), 52 Pa. Code §5.81, requests that the Commission consolidate the above-captioned proceedings (jointly, the “Complaints”). Consolidation of the Complaints is warranted and in the public interest because the Complaints involve the same questions of fact and law and consolidation will avoid unnecessary expense and delay. In support of its Motion, the Company respectfully submits:

1. Lindsey Adams (the “Complainant”) filed the Complaint at Docket No. C-2018-3001175 on April 16, 2018. The Complaint raised issues related to termination of service, usage, and payment assistance.
2. On April 26, 2018, the Complainant filed the Complaint at Docket No. C-2018-3001447, which alleges identical issues to those included in her other Complaint.

3. The Company has attempted to reach the Complainant on multiple occasions in an effort to resolve this issue. The Complainant has not responded to any of the Company's communication attempts.

4. With respect to the Complaint at Docket No. C-2018-3001175, a hearing has been scheduled by the Commission before Administrative Law Judge ("ALJ") Benjamin J. Myers on August 7, 2018.

5. For the Complaint at Docket No. C-2018-3001447, a hearing has been scheduled before ALJ Joel H. Cheskis on August 1, 2018.

6. Consolidation of the Complaints involving the same facts and legal issues would reduce unnecessary expense and delay and promote an efficient use of the Commission's resources consistent with Section 5.81 of the Commission's regulations. The Complainant may address all of the issues raised in her Complaints as part of a single hearing.

WHEREFORE, Pennsylvania Electric Company respectfully requests that the Public Utility Commission (a) consolidate the Complaints of Lindsey Adams; (b) cancel one of the scheduled hearings; and (c) reassign both dockets to a single Administrative Law Judge.

Respectfully submitted,



Teresa Harrold
Attorney No. 311082
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6783
tharrold@firstenergycorp.com

Dated: July 11, 2018

Counsel for Pennsylvania Electric Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LINDSEY ADAMS :
 :
 v. : **Docket No. C-2018-3001175**
 :
PENNSYLVANIA ELECTRIC COMPANY :

LINDSEY ADAMS :
 :
 v. : **Docket No. C-2018-3001447**
 :
PENNSYLVANIA ELECTRIC COMPANY :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Motion to Consolidate the Complaints of Lindsey Adams upon the individual listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by First Class Mail, postage prepaid, as follows:

Lindsey Adams
30 West 4th Street
Lewistown, PA 17044

Dated: July 11, 2018



Teresa Harrold
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6783
tharrold@firstenergycorp.com

Counsel for Pennsylvania Electric Company