

Lauren M. Lepkoski, Esq.
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July 19, 2018

VIA ELECTRONIC FILING

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

**Re: Thomas E. List v. Metropolitan Edison Company
Docket No. C-2018-3003090**

**Thomas E. List v. Metropolitan Edison Company
Docket No. C-2018-3003091**

**Thomas E. List v. Metropolitan Edison Company
Docket No. C-2018-3003093**

Dear Secretary Chiavetta:

Enclosed please find the Motion for Consolidation of Complaints of Metropolitan Edison 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,


Lauren M. Lepkoski

Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

THOMAS E. LIST :
 :
 v. : **Docket No. C-2018-3003090**
 :
METROPOLITAN EDISON COMPANY :

THOMAS E. LIST :
 :
 v. : **Docket No. C-2018-3003091**
 :
METROPOLITAN EDISON COMPANY :

THOMAS E. LIST :
 :
 v. : **Docket No. C-2018-3003093**
 :
METROPOLITAN EDISON COMPANY :

**MOTION OF METROPOLITAN EDISON COMPANY
FOR CONSOLIDATION OF COMPLAINTS**

AND NOW, Metropolitan Edison Company (“Met-Ed” or the “Company”), by and through its counsel, Lauren M. Lepkoski and Tori L. Giesler, 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 (collectively, the “Formal Complaints”). Consolidation of the Formal Complaints is warranted and in the public interest because the Complaints involve the same Complainant and the same questions of fact and law. Consolidation of the Formal Complaints will avoid unnecessary expense and delay. In support of its Motion, the Company respectfully submits:

1. Thomas E. List (“Complainant”) filed a formal complaint at Docket No. C-2018-3003090 on June 27, 2018. The Complaint raised issues related to refusal of installation of a smart meter at 920 Imperial Drive, Mohnton, Pennsylvania 19540.

2. The Complainant filed a formal complaint at Docket No. C-2018-3003091 on June 27, 2018. The Complaint raised issues related to refusal of installation of a smart meter at 843 Imperial Drive, Mohnton, Pennsylvania 19540.

3. The Complainant filed a formal complaint at Docket No. C-2018-3003093 on June 27, 2018. The Complaint raised issues related to refusal of installation of a smart meter at 763 Candy Road, Mohnton, Pennsylvania 19540.


4. Consolidation of the Formal 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.¹ The Complainant may address all of the issues raised in his Formal Complaints as part of a single hearing.

¹ 52 Pa. Code § 5.81

WHEREFORE, Metropolitan Edison Company respectfully requests that the Commission consolidate the Formal Complaints of Thomas E. List.

Respectfully submitted,

Dated: July 19, 2018


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Counsel for Metropolitan Edison Company

**BEFORE THE
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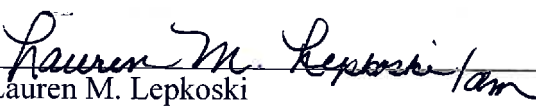
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Motion to Consolidate the Complaints of Thomas E. List 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:

Thomas E. List
920 Imperial Drive
Mohnton, PA 19540

Dated: July 19, 2018


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