

A-Z LEARNING DAYCARE

July 19, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O.B 3265
Harrisburg, Pa. 17105-3265

Re: A-Z Learning Daycare v PPL Electric Utilities Corporation
Docket No: C-2018-3002773

Dear Ms. Chiavetta:

I received the attached e filing in the above captioned matter by Gross McGinley, and read through it. Everything is accurate, BUT WHAT THEY DO NOT SAY is that as part of the reason why payment was delayed was because the government check that is issued to the daycare comes on the 17th of each month and no longer came on the 1st. So we explained that to the PPL personnel and asked to have them change the date of payment to the 18th so the funds would be there and THEY SAID 'we will make the payment date later to be the 18th of each month'.

The problem is they did the waiver, but NEVER changed the date of "payment due". So its not we were late the next month but that we paid but that they never changed the date of payment and so they instituted a "security payment" which we shouldn't have to pay.

I hope this clarifies our position and what they are not telling you or may not know went down.

Sincerely yours,



Dennis Bloom

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July 6, 2018

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

RE: A-Z Learning Daycare v PPL Electric Utilities Corporation
Docket No: C-2018-3002773

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is the Answer on behalf of PPL Electric Utilities Corporation.

Please note that this filing was eFiled with the Commission on the date indicated above.

Very truly yours,

GRAIG M. SCHULTZ

GMS/ejm
Enclosure

cc: A-Z Learning Daycare (w/enc.)
Donna Kingcaid (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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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

A-Z LEARNING DAYCARE,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2018-3002773

ANSWER OF PPL ELECTRIC UTILITIES CORPORATION

PPL Electric Utilities Corporation ("Respondent"), by and through its counsel, hereby Answers the Complaint in the above-captioned proceeding as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. It is admitted that Respondent has provided notice of intent to terminate Complainant's service for an unpaid balance. By way of further answer, on December 28, 2017, Respondent mailed Complainant a letter indicating that it identified that Complainant paid several bills late during the previous year. Respondent informed Complainant that if its account balance was not paid in full by the next bill due date, that a security deposition would be charged to the account. On January 30, 2018, Respondent informed Complainant that a security deposit in the amount of \$1,036.00 would be applied to its next bill. On February 16, 2018, Respondent informed Complainant that it would waive the security deposit as a one-time courtesy, and Complainant agreed to pay all future bills on time. On March 29, 2018, Respondent informed Complainant that a security deposition in the amount of \$990.00 would be applied to the next bill because Complainant continued to pay its bills late. All other allegations are denied.

5. Paragraph 5 constitutes a request for relief to which no Answer is required. To the extent a response is required Respondent, PPL Electric incorporates by reference herein the averments set forth in its Answer to Paragraph 4 of the Complaint.

6. No response is required, as the allegations of this paragraph do not pertain to Respondent PPL Electric.

7. Admitted.

8. No response is required, as the allegations of this paragraph do not pertain to Respondent PPL Electric.

9. No response is required, as the allegations of this paragraph do not pertain to Respondent PPL Electric.

10. No response is required, as the allegations of this paragraph do not pertain to Respondent PPL Electric.

WHEREFORE, in light of the foregoing, PPL Electric Utilities Corporation respectfully requests that the Commission deny the above-captioned Complaint.

DATE: 7/6/18

GROSS MCGINLEY, LLP



BY: _____
GRAIG M. SCHULTZ, ESQUIRE
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A-Z LEARNING DAYCARE,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2018-3002773

CERTIFICATE OF SERVICE

This is to certify that the ANSWER 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 6th day of July 2018

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GROSS MCGINLEY, LLP



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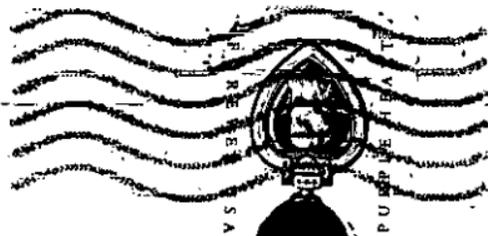
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