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September 28, 2018

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

Re: Charles Spindler v. Knox Energy Cooperative Association, Inc.; Docket No. **C-2018-3004179**; Cherie Roddy v. Knox Energy Cooperative Association, Inc.; Docket No. **C-2018-3004201**; James Leach v. Knox Energy Cooperative Association, Inc.; Docket No. **C-2018-3004411**; John Hollenbaugh v. Knox Energy Cooperative Association, Inc.; Docket No. **C-2018-3004524**; Joyce and Thomas Fedusa v. Knox Energy Cooperative Association, Inc.; Docket No. **C-2018-3004342**; Melvin Bines v. Knox Energy Cooperative Association, Inc.; Docket No. **C-2018-3004354**; Michael Deegan v. Knox Energy Cooperative Association, Inc.; Docket No. **C-2018-3004165**; Nancy Nail v. Knox Energy Cooperative Association, Inc.; Docket No. **C-2018-3004346**; **KNOX ENERGY COOPERATIVE ASSOCIATION, INC.'S MOTION FOR CONSOLIDATION**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is Knox Energy Cooperative Association, Inc.'s Motion for Consolidation of the above captioned Formal Complaints. Hard Copies will follow in accordance with the attached Certificate of Service.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

Todd S. Stewart
Counsel for
Knox Energy Cooperative Association, Inc.

BRB/jld
Enclosure
cc: Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the forgoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party). This document has been filed electronically on the Commission's electronic filing system and served via overnight mail on the following:

VIA FIRST CLASS MAIL

Charles E. Spindler
PO Box 15
Fisher, PA 16225

Joyce and Thomas Fedusa
102 Deer Drive
New Kensington, PA 15068

Cherie Roddy
839 Deaver Lane
Creve Coeur, MO 63141

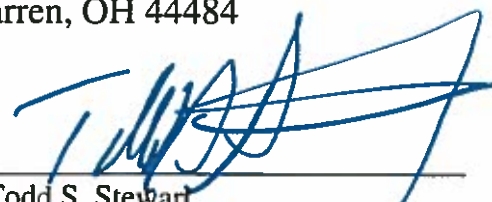
Melvin Bines
2682 Gravelick Road
Leeder, PA 16233

James Leach
PO Box 42
Rome, OH 44085

Michael Deegan
4141 Ellwood Rd.
New Castle, PA 16101

John Hollenbaugh
2662 Gravel Lick Rd.
Leeper, PA 16233

Nancy Nail
137 N. Aspen Ct.
Apt #1
Warren, OH 44484



Todd S. Stewart

Dated: September 28, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CHARLES SPINDLER

Complainant,

v.

KNOX ENERGY COOPERATIVE
ASSOCIATION, INC.

Respondent.

Docket No. C-2018-3004179

CHERIE RODDY

Complainant,

v.

KNOX ENERGY COOPERATIVE
ASSOCIATION, INC.

Respondent.

Docket No. C-2018-3004201

JAMES LEACH

Complainant,

v.

KNOX ENERGY COOPERATIVE
ASSOCIATION, INC.

Respondent.

Docket No. C-2018-3004411

JOHN HOLLENBAUGH

Complainant,

v.

KNOX ENERGY COOPERATIVE
ASSOCIATION, INC.

Respondent.

Docket No. C-2018-3004524

JOYCE FEDUSA AND
THOMAS FEDUSA

Complainant,

v.

KNOX ENERGY COOPERATIVE
ASSOCIATION, INC.

Respondent.

Docket No. C-2018-3004342

MELVIN BINES

Complainant,

v.

KNOX ENERGY COOPERATIVE
ASSOCIATION, INC.

Respondent.

Docket No. C-2018-3004354

MICHAEL DEEGAN

Complainant,

v.

KNOX ENERGY COOPERATIVE
ASSOCIATION, INC.

Respondent.

Docket No. C-2018-3004165

NANCY NAIL

Complainant,

v.

KNOX ENERGY COOPERATIVE
ASSOCIATION, INC.

Respondent.

Docket No. C-2018-3004346

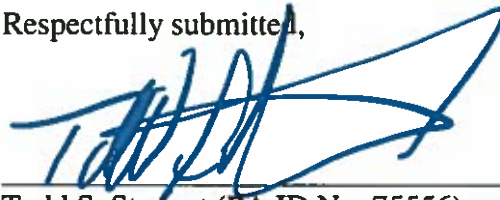
NOTICE TO PLEAD

You are hereby advised that, pursuant to the regulations of the Pennsylvania Public Utility Commission at 52 PA Code §§ 5.61, 5.103, you may file an answer to this motion to consolidate with the Secretary's Bureau of the Pennsylvania Public Utility Commission at the following address:

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

Answers must be filed within 20 days from the date of service. A copy of any answer should be served on the undersigned counsel.

Respectfully submitted,



Todd S. Stewart (PA ID No. 75556)
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Tel: (717) 236-1300
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*Attorneys for Respondent Knox Energy Cooperative
Association, Inc.*

Dated: September 28, 2018

MOTION TO CONSOLIDATE

NOW COMES Knox Energy Cooperative Association, Inc. ("Knox"), by and through its counsel, pursuant to 52 Pa. Code §§ 5.81, 5.103, hereby files this Motion to Consolidate the above-captioned Formal Complaints. In support of its Motion, Knox states as follows:

1. Between August 17, 2018 and September 6, 2018, above captioned Complainants filed Formal Complaints against Knox with the Pennsylvania Public Utility Commission ("Commission").

2. Between August 22, 2018 and September 7, 2018, Knox was served by the Commission's Secretary the Formal Complaints of the above captioned Complainants.

3. There are common questions of law and fact, as well as identical issues raised, and relief sought by the Complainants warranting consolidation.

4. First, the primary question of law, raised in Knox's Answer and New Matter and Preliminary Objections in the above captioned complaints is identical; the Commission lacks Jurisdiction to hear the complaints. Central to each complaint is the fact that Knox is not a public utility, and thus the Commission does not have jurisdiction to hear third party complaints against non-public utilities.

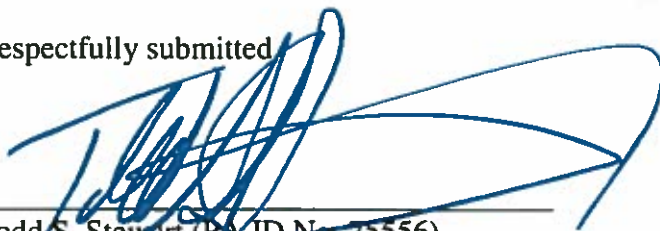
5. Second, the primary question of fact raised by the above captioned complaints revolves around a single event: Knox's source of natural gas to the Complainants, G&G Gas, is discontinuing use of the local gas wells, and thus terminating Knox's supply for its customers. Knox notified the Complainants on August 2, 2018 that their service would be terminated as of October 31, 2018.

6. The above captioned complaints will require the Commission to address the same questions of law and fact. The consolidation of the proceedings will preserve the time and resources of the parties and the Commission and avoid a duplicative process that could potentially result in different findings of law and fact.

7. Consolidation of these matters will not prejudice the Complainants, who will still have an opportunity to state on the record in the consolidated proceedings the reasons underlying their Complaint.

WHEREFORE, Knox Energy Cooperative Association, Inc. respectfully requests that the Formal Complaints of the above captioned Complainants at Docket Nos. C-2018-3004179, C-2018-3004201, C-2018-3004411, C-2018-3004524, C-2018-3004342, C-2018-3004354, C-2018-3004165, and C-2018-3004346 be consolidated.

Respectfully submitted



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Attorneys for Respondent Knox Energy Cooperative Association, Inc.

Dated: September 28, 2018

VERIFICATION

I, Andrew Duckworth, certify that I am the authorized agent of Knox Energy Cooperative Association, Inc., and that in this capacity I am authorized to, and do make this Verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that Knox Energy Cooperative Association, Inc., expects to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



Andrew Duckworth
Knox Energy Cooperative Association, Inc.

DATED: September 28, 2018