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December 6, 2018

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: William D. Haas v. PPL Electric Utilities Corporation
Docket Nos. C-2018-3005984, C-2018-3005988, C-2018-3005986,
C-2018-3005987, C-2018-3005995 and C-2018-3005997**

Dear Secretary Chiavetta:

Enclosed for filing is the Motion to Consolidate of PPL Electric Utilities Corporation in the above-referenced proceedings. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Devin Ryan

DTR/jl
Enclosures

cc: Honorable Elizabeth Barnes
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

William D. Haas
P.O. Box 251
Bear Creek, PA 18602

Date: December 6, 2018



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

William D. Haas,	:	Docket Nos. C-2018-3005984
	:	C-2018-3005988
Complainant,	:	C-2018-3005986
	:	C-2018-3005987
v.	:	C-2018-3005995
	:	C-2018-3005997
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), ANSWERS TO MOTIONS ARE DUE WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE, UNLESS THE PERIOD OF TIME IS OTHERWISE FIXED BY THE COMMISSION OR THE PRESIDING OFFICER. YOUR ANSWER SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

Respectfully submitted,



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Of Counsel:

Post & Schell, P.C.

Date: December 6, 2018

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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	:	C-2018-3005997
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**MOTION TO CONSOLIDATE OF
PPL ELECTRIC UTILITIES CORPORATION**

TO PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby moves to consolidate the above-captioned matters pursuant to 52 Pa. Code § 5.81. The Company is requesting that the proceedings be consolidated for purposes of discovery, hearings, and adjudication because they raise common issues of fact and law.

As explained herein, all of these proceeding involve challenges by William D. Haas (“Complainant”) to PPL Electric’s planned installation of new automated metering infrastructure (“AMI”) meters at various properties owned by the Complainant. For relief, the Complainant requests, among other things, that the Company be directed not to install the new AMI meters at his properties. As alleged support, the Complainant raises the same allegations in all six of the Formal Complaints. Therefore, in the interests of administrative efficiency and judicial economy, PPL Electric believes that these matters should be consolidated.

In support of this Motion, PPL Electric states as follows:

I. BACKGROUND

1. PPL Electric furnishes electric distribution, transmission, and default supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. PPL Electric is a “public utility,” an “electric distribution company,” and a “default service provider” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803.

2. By way of background, the Company deployed automated metering infrastructure (“AMI”) meters and metering system between 2002 and 2004. These AMI meters were a part of a power line carrier (“PLC”) metering system. On November 14, 2008, Act 129 of 2008 became effective and required electric distribution companies (“EDCs”) to file smart meter technology procurement and installation plans with the Commission within nine months. On June 24, 2009, the Commission issued its *Smart Meter Implementation Order*, which set forth requirements for the smart meter plans and procedures for the submission, review, and approval of the smart meter plans. *See Smart Meter Procurement and Installation*, Docket No. M-2009-2092655 (Order entered June 24, 2009) (“*Smart Meter Implementation Order*”).

3. On August 14, 2009, PPL Electric filed its initial Smart Meter Plan in compliance with Act 129 and the Commission’s *Smart Meter Implementation Order*. The Company contended that its existing PLC system met the requirements under Act 129 and the *Smart Meter Implementation Order*. However, the Commission held that PPL Electric’s existing PLC meters did not fully meet these requirements. *See Petition of PPL Electric Utilities Corporation for Approval of Smart Meter Technology Procurement and Installation Plan*, Docket No. M-2009-2123945, p. 24 (Order entered June 24, 2010) (“*2010 Smart Meter Order*”). Accordingly, the

Commission directed PPL Electric to develop a new Smart Meter Plan that would deploy new AMI technology that fully met these requirements. *See id.*

4. On June 30, 2014, PPL Electric filed its new Smart Meter Plan intended to comply with all the requirements of Act 129 and the Commission's *Smart Meter Implementation Order*. To meet these requirements, the Company proposed Radio Frequency ("RF") Mesh meters and metering system. These RF Mesh meters were to be deployed between 2017 and 2019. On September 3, 2015, the Commission entered its Opinion and Order approving the new Smart Meter Plan, as modified, finding that unlike the Company's existing PLC meters, the new RF Mesh meters met the requirements of Act 129 and the Commission's *Smart Meter Implementation Order*. *Petition of PPL Electric Utilities Corp. for Approval of Its Smart Meter Technology Procurement and Installation Plan*, Docket No. M-2014-2430781 (Order Entered Sept. 3, 2015) ("*2015 Smart Meter Order*").

5. By Secretarial Letters dated November 14, 2018, PPL Electric was served with the above-captioned Formal Complaints filed by the Complainant. The issues raised in the Formal Complaints concern the planned installation of new AMI meters pursuant to the Public Utility Code and the *2015 Smart Meter Order* at six of the Complainant's properties. Each of the Formal Complaints corresponds to one of the six properties.

II. MOTION TO CONSOLIDATE

6. PPL Electric herein respectfully requests that the Formal Complaint proceedings at Docket Nos. C-2018-3005984, C-2018-3005988, C-2018-3005986, C-2018-3005987, C-2018-3005995, and C-2018-3005997 be consolidated for purposes of discovery, litigation, and disposition because they are interrelated and raise common issues of law and fact.

7. In all of the Formal Complaints, the Complainant challenges the planned installation of AMI meters at properties he owns. Although each of the Complaints concerns a

distinct service address, the Complainant raises the same allegations and arguments in support of his request that the new AMI meters not be installed. Indeed, the “exhibits” attached to his Complaints are essentially the same (see Exhibits A through K attached to the Complaints),¹ and his allegations and requests for relief in Paragraph 5 are the same.


8. For these reasons, PPL Electric respectfully requests that these proceedings be consolidated. It would be a waste of administrative and judicial resources to litigate these matters separately when they raise overlapping issues of fact and law. Thus, because the disposition of each of these matters is interrelated, the consolidation of these proceedings will promote the efficient use of the time and resources of the parties and the Commission.

¹ PPL Electric notes that the copies of Exhibits it received varied only slightly, in that there were a couple additional blank or missing pages in some of the Exhibits attached to the Complaints.

III. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission enter an order consolidating the Formal Complaint proceedings at Docket Nos. C-2018-3005984, C-2018-3005988, C-2018-3005986, C-2018-3005987, C-2018-3005995, and C-2018-3005997 for purposes of discovery, litigation, and disposition.

Respectfully submitted,



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Michael J. Shafer (ID # 205681)
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Of Counsel:

Post & Schell, P.C.

Date: December 6, 2018

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Complainant,	:	C-2018-3005986
	:	C-2018-3005987
v.	:	C-2018-3005995
	:	C-2018-3005997
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

PROPOSED ORDER

AND NOW, in consideration of the Motion to Consolidate filed on December 6, 2018, by PPL Electric Utilities Corporation in the above-captioned matters,

IT IS ORDERED:

1. That the Motion to Consolidate filed by PPL Electric Utilities Corporation is granted, consistent with this Order.

2. That the proceedings William D. Haas v. PPL Electric Utilities Corporation, at Docket Nos. C-2018-3005984, C-2018-3005988, C-2018-3005986, C-2018-3005987, C-2018-3005995, and C-2018-3005997, shall be consolidated for purposes of discovery, litigation, and disposition.

3. The Parties are directed to use the following caption and docket number for every document filed in these consolidated cases:

William D. Haas	Docket Nos. C-2018-3005984
	C-2018-3005988
v.	C-2018-3005986
	C-2018-3005987
PPL Electric Utilities Corporation	C-2018-3005995
	C-2018-3005997

4. A copy of any document filed with the Commission's Secretary or submitted shall be sent directly to the undersigned. Service on the undersigned shall be by hard copy to the following address: Office of Administrative Law Judge, Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, 2nd Floor West, P.O. Box 3265, Harrisburg PA 17105-3265.

Date

Administrative Law Judge

