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*Also admitted in NJ
•Also admitted in DC
•Also admitted in MD
•Also admitted in MA
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Emmaus, PA 18049
Phone: 610/967-1030
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Lehighton Office
415 Mahoning Street
Lehighton, PA 18235
Phone: 610/377-0500

December 27, 2018

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

RE: Suzanne Kohrs v. PPL Electric Utilities Corporation
Docket No: C-2018-3006421

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is the Motion for Consolidation 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,



KIMBERLY G. KRUPKA

KGK/jm
Enclosure

cc: Suzanne Kohrs (w/ enc.)
Donna Kingcaid (w/enc.) *via email only*
Kimberly R. Hanson (w/enc.) *via email only*
Michelle L. Bartolomei (w/ enc.); *via email only*
Holly M. Groth (w/enc.) *via email only*
Shelbie Frederick Bayda (w/enc.) *via email only*

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SUZANNE KOHRS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

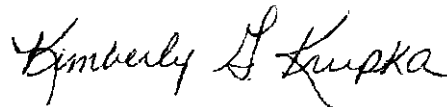
NO. C-2018-3006421

NOTICE TO PLEAD

TO: SUZANNE KOHRS
382 BRYN MAWR RD
HONESDALE PA 18431

Pursuant to 52 Pa. Code Section 5.61, you are hereby notified that you have twenty (20) days from the date of service of the within Motion for Consolidation in which to answer, and that if you fail to so answer within twenty (20) days from the date of service, Respondent's Motion for Consolidation may be granted without further notice.

RESPECTFULLY SUBMITTED,



BY: _____

KIMBERLY G. KRUPKA, ESQUIRE
*Attorney for Respondent, PPL Electric
Utilities Corporation*

Dated: 12/27/18
In Allentown, Pennsylvania

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SUZANNE KOHRS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2018-3006421

MOTION OF PPL ELECTRIC FOR CONSOLIDATION

PPL Electric Utilities Corporation (“Respondent PPL Electric”), by and through its counsel, hereby files a Motion for Consolidation in the above-captioned proceeding as follows:

1. Movant is PPL Electric Utilities Corporation, Respondent in the above captioned action.

2. Respondent is Suzanne Kohrs (hereinafter “Kohrs”), Complainant in the above captioned action.

3. The instant action was commenced by Kohrs by the filing of a Complaint on or about November 30, 2018.

4. The instant action alleges reliability, safety or quality problems with utility service, as well as “other” as explained in Kohrs’ letter attached to her Complaint. A true and correct copy of the Complaint is attached hereto as Exhibit “A” and incorporated herein. It appears, and therefore is averred, that Kohrs’ Complaint related to a construction project and restoration of Kohrs’ property.

5. On or about November 9, 2018, Kohrs filed a Complaint at docket number C-2018-3006013 (hereinafter “Initial Complaint”). A true and correct copy of the Initial Complaint is attached hereto as Exhibit “B” and incorporated herein.

6. The Initial Complaint, as filed on November 9, 2018, alleges reliability, safety or quality problems with utility service, as well as “other” as explained in Kohrs’ letter attached to her Complaint. It appears, and therefore is averred, that Initial Complaint relates to the same construction project which is the subject of the Instant Action.

7. As the Complaints filed at Docket Numbers C-2018-3006421 and C-2018-3006013 involve a common question of law and fact, Movant PPL Electric respectfully requests the two actions be consolidated.

8. The Consolidation of Docket Numbers C-2018-3006421 and C-2018-3006013 will promote judicial economy by avoiding unnecessary costs and delays.

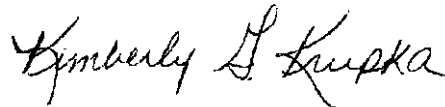
9. The Consolidation of Docket Numbers C-2018-3006421 and C-2018-3006013 will not prejudice any party.

10. Consolidation is hereby requested pursuant to 52 Pa. Code § 5.81.

WHEREFORE, Respondent, PPL Electric respectfully requests Docket Numbers C-2018-3006421 and C-2018-3006013 be consolidated.

DATE: 12/27/18

GROSS MCGINLEY, LLP



BY: _____

KIMBERLY G. KRUPKA, ESQUIRE
Attorney ID # 83071
Attorney for Respondent
PPL Electric Utilities Corporation
33 S. Seventh Street; P O Box 4060
Allentown PA 18105-4060
Ph. (610) 820-5450; Fax (610) 820-6006

EXHIBIT A

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint

Filing this form begins a legal proceeding and you will be a party to the case. If you do not wish to be a party to the case, consider filing an informal complaint.

To complete this form, please type or print legibly in ink.

1. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number. It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name Suzanne Bold Kohrs

Street/P.O. Box 382 Bryn Mawr Rd Apt #

City Honesdale State Pa Zip 18431

County Wayne

Telephone Number(s) Where We Can Contact You During the Day:

(570) 253-1630 (home) (570) 470-0007 (mobile)

E-mail Address (optional): Bolds@verizon.net

Utility Account Number (from your bill) 43380-5108

If your complaint involves utility service provided to a different address or in a different name than your mailing address, please list this information below.

Name Suzanne Bold Kohrs

Street/P.O. Box 371 Bryn MAWR Rd.

City Honesdale State Pa Zip 18431

2. Name of Utility or Company (Respondent)

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

Pennsylvania Power & Light

RECEIVED 2018 NOV 30 AM 11:11 SECRETARY'S BUREAU PA PUC

3. **Type of Utility Service**

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- | | |
|--|---|
| <input checked="" type="checkbox"/> ELECTRIC | <input type="checkbox"/> WASTEWATER/SEWER |
| <input type="checkbox"/> GAS | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance) |
| <input type="checkbox"/> WATER | <input type="checkbox"/> MOTOR CARRIER (e.g. taxi, moving company, limousine) |
| <input type="checkbox"/> STEAM HEAT | |

4. **Reason for Complaint**

What kind of problem are you having with the utility or company? Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. Your complaint may be dismissed without a hearing if you do not provide specific information.

- The utility is threatening to shut off my service or has already shut off my service.

- I would like a payment agreement.

- Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.

- I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.

- Other (explain).

Enclosed Letter

November 27, 2018

This correspondence represents an official complaint in regard to the construction undertaking referenced in the Project 2016-2681-002 design drawings. There are two key aspects to this complaint that require attention. PP&L has the obligation to restore a portion of the land in question to its pre-construction condition from a previous project. Once properly restored, Project 2016-2681-002 would not require the use of land which exceeds the bounds of the right-of-way.

In 2015, PP&L undertook the task of restoring a deteriorating power pole on my property. Though there is a right-of-way, the company requested to use a different access point. A verbal agreement was reached that stated an access point on private land could be utilized if the land were returned to pre-construction condition upon the conclusion of the project. Unfortunately, the latter part of this agreement was violated. The project was completed, but the land was never returned to its pre-construction condition – There was never even an attempt to remedy the situation. This prompted the installation of a mobile fence, which blocks the access point on private land, for liability issues. Before Project 2016-2681-002, a multitude of official requests were made for this situation to be fixed; no effort was ever made.

In October of 2018, PP&L came to the conclusion that Project 2016-2681-002 needed to be acted upon. A review of Erosion And Sediment Control Plan sheet C313 for the project will display the a portion of the private access road from 2015 (sheet C320 depicts another portion). As these documents show, PP&L considers this to be their land, which is nothing more than an illegal seizure. The deed and right-of-way agreement will corroborate that the private access road is not included. In addition, there is not legal documentation supporting PP&L's claim to the 2015 access point.

The right-of-way (as stipulated in deed LA-73726-0) clearly dictates a 70ft wide piece of land that runs from North to South (as shown in sheet C313). The deed for the land states that PP&L can transact business upon, across, over, under and along a strip of land 70ft in width. There is no mention of a legal claim to land outside of this said, strip of land. Sheet C313 clearly depicts PP&L's intentions of excavating outside of their allowed area in wetlands by a considerable distance. This illegal action would not even be required if the company properly removed the temporary construction pad they erected at the base of the private access road in 2015. Due to their previous incompetence, PP&L desires to overreach on the right-of-way and will unnecessarily damage to the land in question.

This complaint is composed of two main aspects. PP&L is operating under the assumption that they have the right of a piece of private land. This specific piece of property also has to be restored from a project completed in 2015. Project 2016-2681-002 is wrongfully using land outside the bounds of the right-of-way. I was never informed of any of these intentions. Due to the daily construction performed by PP&L on my property, I would appreciate immediate consideration.

Regards,

Suzanne Bold Kohrs

Suzanne Bold-Kohrs

Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

5. Requested Relief

How do you want your complaint to be resolved? Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

6. **Protection From Abuse (PFA)**

Has a court granted a "Protection From Abuse" order that is currently in effect for your personal safety or welfare? The PUC needs this information to properly process your complaint so that your identity is not made public.

Note: You must answer this question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a problem involving billing, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection From Abuse" order for your personal safety or welfare?

YES

NO

If your answer to the above question is "yes," attach a copy of the current Protection From Abuse order to this Formal Complaint form.

7. **Prior Utility Contact**

a. Is this an appeal from a decision of the PUC's Bureau of Consumer Services (BCS)?

YES

NO

Note: If you answered yes, move to Section 8. No further contact with the utility or company is required. If you answered no, answer the question in Section 7 b. and answer the question in Section 7 c. if relevant.

b. If this is not an appeal from a BCS decision, have you spoken to a utility or company representative about this complaint?

YES

NO

Note: You must contact the utility first if (1) you are a residential customer, (2) your complaint is against a natural gas distribution utility, an electric distribution utility or a water utility AND (3) your complaint is about a billing problem, a service problem, a termination of service problem, or a request for a payment agreement.

c. If you tried to speak to a utility company representative about your complaint but were not able to do so, please explain why.

Note: Even if you are not required to contact the utility or company, you should always try to speak to a utility or company representative about your problem before you file a Formal Complaint with the PUC.

8. Legal Representation

If you are filing a Formal Complaint as an individual on your own behalf, you are not required to have a lawyer. You may represent yourself at the hearing.

If you are already represented by a lawyer in this matter, provide your lawyer's name, address, telephone number, and e-mail address, if known. Please make sure your lawyer is aware of your complaint. If represented by a lawyer, both you and your lawyer must be present at your hearing.

Lawyer's Name _____

Street/P.O. Box _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

E-mail Address (if known) _____

Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.

9. **Verification and Signature**

You must sign your complaint. Individuals filing a Formal Complaint **must** print or type their name on the line provided in the verification paragraph below and **must** sign and date this form in **ink**. If you do not sign the Formal Complaint, the PUC **will not accept it**.

Verification:

I Suzanne B. Kohrs, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Suzanne B Kohrs 11-28-2018
(Signature of Complainant) (Date)

Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification **must** be signed by an authorized officer or authorized employee. If the Formal Complaint is **not signed** by one of these individuals, the PUC **will not accept it**.

10. **Two Ways to File Your Formal Complaint**

Electronically. You must create an account on the PUC's eFiling system, which may be accessed at <http://www.puc.pa.gov/efiling/default.aspx>.

Note: If you are appealing your Bureau of Consumer Services (BCS) decision, you must file your formal complaint by mail.

Mail. Mail the completed form with your original signature and any attachments, by certified mail, first class mail, or overnight delivery to this address:

Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17120

Note: Formal Complaints sent by fax or e-mail will **not** be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

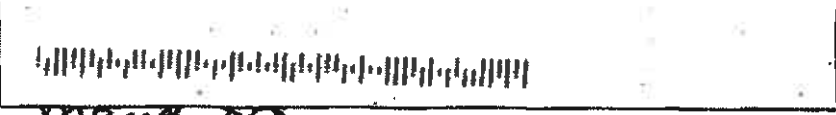
Keep a copy of your Formal Complaint for your records.

ve Kolrs

82 Bryn Mawr Rd

Onesdale Pa

18431



\$1.00
US POSTAGE
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18431
00001478

Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

EXHIBIT B

RECEIVED
2018 NOV -9 AM 11:29
PA PUC
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint

RECEIVED
2018 OCT 31 AM 10:23
PA PUC
SECRETARY'S BUREAU

Filing this form begins a legal proceeding and you will be a party to the case. If you do not wish to be a party to the case, consider filing an Informal complaint.

To complete this form, please type or print legibly in Ink.

1. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number. It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name Suzanne Kohrs

Street/P.O. Box 382 Bryn MAWR Rd Apt # _____

City Honesdale State Pa Zip 18431

County Wayne

Telephone Number(s) Where We Can Contact You During the Day:

(570) 253-1630 (home)

(570) 470-0007 (mobile)

E-mail Address (optional): Bokhs@verizon.net

Utility Account Number (from your bill) 43380-51008

If your complaint involves utility service provided to a different address or in a different name than your mailing address, please list this information below.

Name Suzanne Kohrs

Street/P.O. Box 371 Bryn MAWR Rd.

City Honesdale State Pa Zip 18431

2. Name of Utility or Company (Respondent)

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

Pennsylvania Power & Light

3. Type of Utility Service

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- ELECTRIC WASTEWATER/SEWER
 GAS TELEPHONE/TELECOMMUNICATIONS (local, long distance)
 WATER MOTOR CARRIER (e.g. taxi, moving company, limousine)
 STEAM HEAT

4. Reason for Complaint

What kind of problem are you having with the utility or company? Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. Your complaint may be dismissed without a hearing if you do not provide specific information.

- The utility is threatening to shut off my service or has already shut off my service.
- I would like a payment agreement.
- Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.
- I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.
- Other (explain).

See enclosed

Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

5. Requested Relief

How do you want your complaint to be resolved? Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

- ① Remove the Steel pole erection pad & restore that area back to its original condition with positive drainage grading, seeding & mulching.
- ② Remove the stone access road from the lawn area on the southwest side of the barn. This disturbed area, also, needs to be put back to its original condition with positive drainage grading, seeding & mulching, so this lawn area can be mowed again.
- ③ reimbursement for gate I had to have installed. While I was waiting for this to be resolved.
- ④ Fees for letters + emailed to P.P + L from Attorney Krause.

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

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Note: You must answer this question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a problem involving billing, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection From Abuse" order for your personal safety or welfare?

YES

NO

If your answer to the above question is "yes," attach a copy of the current Protection From Abuse order to this Formal Complaint form.

7. Prior Utility Contact

a. Is this an appeal from a decision of the PUC's Bureau of Consumer Services (BCS)?

YES

NO

Note: If you answered yes, move to Section 8. No further contact with the utility or company is required. If you answered no, answer the question in Section 7 b. and answer the question in Section 7 c. if relevant.

b. If this is not an appeal from a BCS decision, have you spoken to a utility or company representative about this complaint?

YES

NO

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c. If you tried to speak to a utility company representative about your complaint but were not able to do so, please explain why.

Note: Even if you are not required to contact the utility or company, you should always try to speak to a utility or company representative about your problem before you file a Formal Complaint with the PUC.

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If you are filing a Formal Complaint as an individual on your own behalf, you are not required to have a lawyer. You may represent yourself at the hearing.

If you are already represented by a lawyer in this matter, provide your lawyer's name, address, telephone number, and e-mail address, if known. Please make sure your lawyer is aware of your complaint. If represented by a lawyer, both you and your lawyer must be present at your hearing.

Lawyer's Name _____

Street/P.O. Box _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

E-mail Address (if known) _____

Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.

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You must sign your complaint. Individuals filing a Formal Complaint **must** print or type their name on the line provided in the verification paragraph below and **must** sign and date this form in **ink**. If you do not sign the Formal Complaint, the PUC **will not accept it**.

Verification:

I Suzanne Kohus, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Suzanne Kohus
(Signature of Complainant)

11-6-2018 SK.
~~10-29-2018~~
(Date)

Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification **must** be signed by an authorized officer or authorized employee. If the Formal Complaint is **not signed** by one of these individuals, the PUC **will not accept it**.

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Note: If you are appealing your Bureau of Consumer Services (BCS) decision, you must file your formal complaint by mail.

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Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17120

Note: Formal Complaints sent by fax or e-mail will **not** be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your Formal Complaint for your records.

Suzanne Kohrs
382 Bryn Mawr Rd.
Honesdale Pa 18431
October 28, 2018
11-6-2018

To PUC,

This issue has been on going since late summer of 2016.

I granted PP&L a one time use with the agreement that any and all roadway disturbance would be returned back to the pre existing condition. This has never been completed. By having this situation not rectified, I have been forced to install a gate to protect myself from any liabilities, that this roadway could possibly cause me. I have talked to several different PP&L representatives or agents representing PP&L and still the problem exists.

Sincerly,

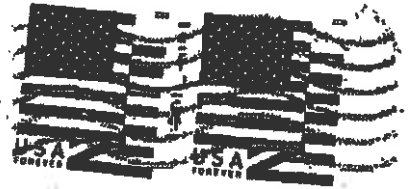


Suzanne Kohrs

**BOLD'S GARDEN CENTER
FLORAL & GIFT SHOP
259 WILLOW AVENUE
HONESDALE, PA 18431**

LEHIGH VALLEY PA 180

POSTAGE WILL BE PAID BY ADDRESSEE



Secretary
Penn. Public Utility Comm.
400 North St.
Harrisburg Pa 17120

17120-007999



BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SUZANNE KOHRS,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

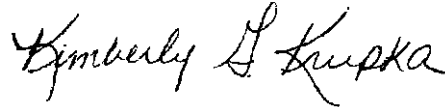
NO. C-2018-3006421

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 27th day of December, 2018.

SUZANNE KOHRS
382 BRYN MAWR RD
HONESDALE PA 18431

GROSS MCGINLEY, LLP



BY: _____

KIMBERLY G. KRUPKA, ESQUIRE
Attorney ID # 83071
Attorney for Respondent
PPL Electric Utilities Corporation
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