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WE FIGHT FOR WHAT'S RIGHT.

July 22, 2019

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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: Borough of Blakely v. PPL Electric Utilities Corporation
Docket No.: C-2019-3010412
Our File No.: 1109

Dear Sir/Madam:

Enclosed for filing please find Borough of Blakely's Reply to PPL Electric Utilities Corporation's New Matter and Borough of Blakely's Answer to Preliminary Objections of PPL Electric Utilities Corporation in the above matter.

Thank you.

Very truly yours,

Edwin A. Abrahamsen, Jr.

Resigned 8/6/19

CA/jsp

enclosures

cc: Devin T. Ryan, Esquire (w/encls.) (Via Email dryan@postschell.com)

EDWIN A. ABRAHAMSEN* | JAMES J. CONABOY* | EDWIN A. ABRAHAMSEN, JR. | KEVIN M. CONABOY* | JOSHUA BORER
OF COUNSEL: MARY ANN CONABOY ABRAHAMSEN | CHARLES F. LIEBERMAN | WALTER W. O'HARA (1920 - 1993)

*Certified civil trial advocate by the National Board of Trial Advocacy. The National Board of Trial Advocacy is a Pennsylvania Supreme Court Accredited Agency.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Borough of Blakely, :
 :
Complainant, :
 :
v. : Docket No. C-2019-3010412
 :
PPL Electric Utilities Corporation, :
 :
Respondent. :

**BOROUGH OF BLAKELY'S REPLY TO
RESPONDENT, PPL ELECTRIC UTILITIES
CORPORATION'S NEW MATTER**

NOW, comes the Borough of Blakely, by and through counsel, Abrahamsen, Conaboy & Abrahamsen, P.C., and in response to PPL Electric Utilities Corporation's New Matter, states the following:

1. The Borough of Blakely (hereinafter referred to as "Blakely") incorporates their Complaint as though fully set at forth at length herein.
2. Denied as stated. It is not clear from the attached documentation that, in fact, the territory is solely within the certificated service territory and not within appropriate position for Blakely to provide electric power service.
3. Denied. After reasonable investigation, Blakely is without knowledge or information sufficient to form a belief as to the truth of the matter asserted. Strict proof is demanded.
4. Denied. After reasonable investigation, Blakely is without knowledge or information sufficient to form a belief as to the truth of the matter asserted. Strict proof is demanded.

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5. Denied. After reasonable investigation, Blakely is without knowledge or information sufficient to form a belief as to the truth of the matter asserted. Strict proof is demanded.

6. Denied. After reasonable investigation, Blakely is without knowledge or information sufficient to form a belief as to the truth of the matter asserted. Strict proof is demanded. By way of further response, Tariff Electric Pa. P.U.C. No. 197 was enacted prior to the formation of Blakely Electric Company.

7. Denied. After reasonable investigation, Blakely is without knowledge or information sufficient to form a belief as to the truth of the matter asserted. Strict proof is demanded. By way of further response, Tariff Electric Pa. P.U.C. No. 198 was enacted prior to the formation of Blakely Electric Company.

8. Denied. This paragraph states conclusions of law to which no responsive pleading is required. By way of further response, Blakely is attempting to have the Public Utility Commission establish an abandonment by PPL since PPL has refused to do the same.

9. Denied. This paragraph states conclusions of law to which no responsive pleading is required. By way of further response, Blakely is attempting to have the Public Utility Commission establish an abandonment by PPL since PPL has refused to do the same.

10. Denied. This paragraph states conclusions of law to which no responsive pleading is required. By way of further response, Blakely is attempting to have the Public Utility Commission establish an abandonment by PPL since PPL has refused to do the same.

11. Denied. This paragraph states conclusions of law to which no responsive pleading is required.

12. Denied. This paragraph states conclusions of law to which no responsive pleading is required.

13. Denied. This paragraph states conclusions of law to which no responsive pleading is required. Strict proof is demanded.

14. Denied. This paragraph states conclusions of law to which no responsive pleading is required. Strict proof is demanded.

15. Denied. This paragraph states conclusions of law to which no responsive pleading is required. Strict proof is demanded.

16. Denied. This paragraph states conclusions of law to which no responsive pleading is required. Strict proof is demanded.

17. Denied. After reasonable investigation, Blakely is without or information sufficient to form a belief as to the truth of the matter asserted. Strict proof is demand.

18. Denied. After reasonable investigation, Blakely is without or information sufficient to form a belief as to the truth of the matter asserted. Strict proof is demand.

19. Denied. After reasonable investigation, Blakely is without or information sufficient to form a belief as to the truth of the matter asserted. Strict proof is demand.

20. Admitted.

21. Denied. After reasonable investigation, Blakely is without or information sufficient to form a belief as to the truth of the matter asserted. Strict proof is demand.

22. Denied. After reasonable investigation, Blakely is without or information sufficient to form a belief as to the truth of the matter asserted. Strict proof is demand.


WHEREFORE, the Borough of Blakely respectfully requests that judgment be entered in their favor and against PPL Electric Utilities Corporation and an Order issued by the Public Utility Commission directing abandonment by PPL and transfer of the subject customers to the Borough

of Blakely.

Respectfully submitted,

ABRAHAMSEN, CONABOY & ABRAHAMSEN, P.C.

By:



Edwin A. Abrahamson, Jr. Esquire
Attorney ID Number 92851

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Scranton, PA 18505
(570) 348-0200
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VERIFICATION

I, Thomas J. Wascura, hereby verify that I am the Manager for the Borough of Blakely herein, and that the statements contained in the foregoing "Reply to New Matter" are true and correct to the best of my information, knowledge and belief, and that the statements are made subject to the penalties of 18 Pa. C.S.A Section 4904 pertaining to unsworn falsification to authorities.



Thomas Wascura, Manager
Borough of Blakely

DATE: 7/22/19 2019

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CERTIFICATE OF SERVICE

I, Edwin A. Abrahamsen, Jr., Esquire, do hereby certify that on the 22nd day of July, 2019,

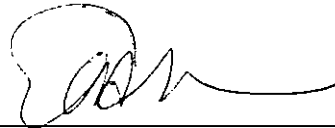
I served a true and correct copy of the attached "Reply to New Matter" upon the following via U.S.

First Class Mail to:

Devin T. Ryan, Esquire
Post & Schell, P.C.
17 North Front Street, 12th Floor
Harrisburg, PA 17101-1601

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

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Edwin A. Abrahamsen, Jr., Esquire

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

17120-009399

LEHIGH VALLEY
PA 180
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FIRST-CLASS

