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File #: 167945

September 4, 2019

VIA E-MAIL & REGULAR MAIL

Honorable Elizabeth Barnes
Administrative Law Judge
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Re: Dana Brennan v. PPL Electric Utilities Corporation
Docket No. C-2019-3007121

Your Honor:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) respectfully submits this letter in response to Dana Brennan’s (“Complainant”) letter sent via on September 3, 2019, at 9:28 PM. The Complainant requests that the hearing scheduled for September 10, 2019, at 9:00 AM be rescheduled because PPL Electric answered her second set of discovery requests but has not yet answered the remainder of her first set of discovery requests, which were the subject of the Order Granting in Part and Denying in Part the Complainant’s Second Motion to Compel. The Complainant also alleges that the Company’s actions in responding to the second set of discovery requests are in violation of that Order.

The Complainant’s request should be denied. The Order clearly states that PPL Electric is directed to answer the remaining interrogatories in the Complainant’s first set of discovery requests, as modified, **by September 6, 2019**. See Order, pp. 2-5. As it is September 4, 2019, PPL Electric’s responses are not past due. Nonetheless, the Company plans on serving its responses to those remaining interrogatories by tomorrow, September 5, 2019, *i.e.*, before the September 6, 2019 deadline, to provide the Complainant with additional time to review the responses before the September 10, 2019 hearing.

Furthermore, it is unclear why the Complainant is criticizing the Company for answering her second set of discovery requests. The Complainant filed a Third Motion to Compel, which requested that the Company’s objections to those interrogatories be dismissed and that PPL

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Electric be compelled to answer those discovery requests. As stated in PPL Electric's Answer to the Complainant's Third Motion to Compel, the Company answered the Complainant's second set of discovery requests on August 30, 2019, despite its objections to them, in an effort to expedite the conduct of this proceeding. Therefore, the Third Motion to Compel is now moot.

In addition, PPL Electric notes that the Complainant sent a third set of discovery requests last week on August 26, 2019, via first class mail, which consists of 12 additional questions. Although the Company's objections and answers to those interrogatories are not due until September 9, 2019, and September 18, 2019, respectively, PPL Electric will be serving its answers, without waiver of and subject to any of its objections, by tomorrow, September 5, 2019.

Thus, by the close of business tomorrow, the Complainant will have answers to all of her discovery requests.

For these reasons, the Complainant's request to continue the September 10, 2019 hearing should be denied.

Respectfully submitted,



Devin Ryan

DTR/dc
Enclosure

cc: Rosemary Chiavetta, Secretary
Eva Maki
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 EMAIL & FIRST CLASS MAIL

Dana Brennan
16 Oslo Way
Newfoundland, PA 18445
jndbrennan@gmail.com

Date: September 4, 2019

A handwritten signature in black ink, appearing to read 'D. Ryan', written over a horizontal line.

Devin T. Ryan