

Lawrence and Debra Esposito  
4239 High Rd., Cresco, PA 18326

September 4, 2019  
*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: Lawrence And Debra Esposito v. PPL Electric Utilities Corporation  
Docket No. C-2019-3007334**

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Dear Secretary Chiavetta:

Enclosed for filing is the response by Lawrence and Debra Esposito to Motion by PPL Electric Utilities Corporation to Dismiss the Formal Complaint in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully,



Lawrence Esposito

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 E-MAIL AND FIRST-CLASS MAIL**

Devin Ryan  
Post and Schell  
17 North Second Street 12th Floor  
Harrisburg, PA 17101-1601  
[dryan@postschell.com](mailto:dryan@postschell.com)



Date: September 4, 2019

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Lawrence Esposito

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Lawrence and Debra Esposito,  
Complainants,

v.

PPL Electric Utilities Corporation,  
Respondent.

Docket No. C-2019-3007334

**PETITION TO HONORABLE ELIZABETH BARNES TO DENY THE MOTION TO  
DISMISS BY PPL ELECTRIC UTILITIES CORPORATION**

**TO HONORABLE ELIZABETH BARNES**

1. We have the right to a hearing. Regardless of the circumstances we continue to have a right to a hearing.
2. There are other sanctions Your Honor may impose short of dismissing our complaint. We request that our hearing be allowed to progress. Alternate sanctions short of dismissal are within the power of the Administrative Law Judge.
3. We have graciously extended to PPL Electric Utilities Corporation a change of date and time for the hearing to suit the availability of their experts. We would hope to be extended similar grace regarding the Motion to Dismiss.

**CONCLUSION**

We request of the Honorable Elizabeth Barnes that no sanctions be imposed. However, if sanctions are to be imposed, we request that they fall short of the final sanction of dismissal of our complaint and that the Motion to Dismiss be denied so that the hearing will take place as scheduled on the new date.

**Respectfully Submitted:**



**Lawrence Esposito**

**4239 High Rd.**

**Cresco, PA 18326**

**917-767-9962**