

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

600 SCRANTON LLC	:	
	:	
v.	:	C-2019-3014952
	:	
PPL ELECTRIC UTILITIES CORP.	:	

**600 SCRANTON LLC ANSWER TO PETITION TO INTERVENE FILED
BY AKSD DISCOUNT STORES LLC, a/k/a P&R DISCOUNTS**

AND NOW comes 600 Scranton LLC, having filed a Formal Complaint before the Pa. PUC against PPL Electric Utilities Corp., Respondent, in Answer to the Petition to Intervene filed by AKSD Discount Stores, LLC a/k/a P&R Discounts (Petitioner) demanding the Petition to Intervene be denied and setting forth the following in support thereof:

ANSWER

1. Admitted in part, Denied in part. It is Admitted that 600 Scranton LLC (Complainant) filed a Formal Complaint against PPL Electric Utilities Corporation (Respondent) on December 13, 2019 assigned Docket No. C-2019-3014952. It is Denied the Formal Complaint concerned “the interruption of service to Complainant’s property located at or known as Route 6 Scranton/Carbondale Highway Eynon, Pennsylvania (The Property)”. Nowhere, not once, did the filed Formal Complaint state anything concerning interruption of service to Complainant’s Property.

2. Admitted in part, Denied in part. It is admitted that Petitioner is a Tenant of Complainant’s Property occupying a leased premise of approximately 110,000 square feet in dimension area of the over one million square foot building on the Property. It is denied that Petitioner’s claim for alleged Damages caused by a power outage is material or relevant to the Billing issues set forth in the Formal Complaint or that the PUC has jurisdiction to consider or award any claim for such damages.

3. Admitted.

4. Admitted.

5. Admitted in part and denied in part. It is admitted that 52 Pa. Code § 5.72 (a) sets forth three avenues for a Party to be Eligible to intervene in a Formal Complaint Proceeding before the Commission. It is admitted that 52 Pa. Code § 5.72 (a) (1) and 52 Pa. Code § 5.72 (a) (3) do not provide a basis for Petitioner's Intervention. It is denied Petitioner's is Eligible to intervene in this Formal Complaint as claimed by Petitioner pursuant to 52 Pa. Code § 5.72 (a) (2) which states intervention is allowed "where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and, as to which the person may be bound by the action of the Commission in the preceding." (Emphasis added) There is absolutely no possible way Petitioner has an interest in a Complaint involving Billing issues between Complainant and Respondent exclusively and there is no possibility at all, the Administrative Law Judge in this Case will take any action or make any Ruling binding on the Petitioner.

6. Denied. It is denied Petitioner has any cognizable or recognized Interest whatsoever in a Billing dispute between Complainant and PPL before the PUC.

7. Denied. It is denied Petitioner has any cognizable or recognized Interest whatsoever in Notice of termination or suspension of Electric Service at the Property not an issue in the present Case limited to a Billing dispute between the Complainant and Respondent.

WHEREFORE Complainant, 600 Scranton LLC, respectfully requests the Commission to deny the Petition to Intervene filed by AKSD Discount Stores, LLC d/b/a/ P&R Discount.

Respectfully submitted,

Thomas J Jones Jr.

Thomas J. Jones Jr., Esq.
410 Spruce St. Suite 301
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I served a true and correct copy of the Complainant's Answer to Petition to Intervene filed by AKSD Discount Stores LLC d/b/a P&R Discounts that was filed electronically with the Commission upon Administrative Law Judge Dennis J. Buckley, Petitioner and Counsel of Record for PPL in the following manner:

Hon. Dennis J. Buckley
Administrative Law Judge
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Dated: February 13, 2020


David L. Kurtz