

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

600 SCRANTON LLC :  
 :  
v. :  
 :  
PPL ELECTRIC UTILITIES :  
CORPORATION : NO. C-2019-3014952

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RESPONSE TO “THIRD PARTY NOTIFICATION” ENTRY

Pursuant to 52 Pa. Code §§5.71, et seq., AKSD Discount Stores, LLC a/k/a P&R Discounts (“Petitioner”), by and through its attorneys, Cipriani & Werner, hereby files this Response to Third Party Notification in the above-captioned proceeding and in support thereof states as follows:

1. AKSD Discount Stores, LLC a/k/a P&R Discounts (“P&R Discounts”), restates and incorporates its original Intervention.
2. The termination of service directly affected P&R Discounts inasmuch power was completely terminated to their facility causing great and substantial damage. The damage of which could have been avoided by prompt notification of termination.
3. Included in the lease payments of P&R Discounts is payment for power service. The power service has been fully paid pursuant to the Lease Terms. 600 Scranton, LLC has not made the transmission of the payments to PP&L which they should be compelled to do, in full and timely manner.

WHEREFORE, Petitioner, AKSD Discount Stores, LLC a/k/a P&R Discounts, respectfully requests they be a part of this proceeding.

Respectfully submitted,

CIPRIANI & WERNER, P.C.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I served a true and correct copy of AKSD Discount Stores, LLC a/k/a P&R Discounts Response to Answer to “Third Party Notification” Entry upon counsel for the parties by email, on the 18<sup>th</sup> day of February, 2020, as follows:

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Respectfully submitted,

CIPRIANI & WERNER, P.C.

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