

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Andrew Perrong	:	
	:	
v.	:	Docket # C-2020-3019899
	:	
Frontier Utilities Northeast, LLC	:	

**ANSWER TO RESPONDENT FRONTIER UTILITIES NORTHEAST, LLC’S  
MOTION FOR RULING ON PRELIMINARY OBJECTIONS**

Complainant ANDREW PERRONG hereby replies to the Motion for Ruling on Preliminary Objections of FRONTIER UTILITIES NORTHEAST, LLC (hereinafter “Respondent”) as follows:

1. Complainant DENIES paragraphs 1 through 9 of Respondent’s motion.
2. Complainant DENIES that Respondent is entitled to any relief.
3. Complainant avers that the relief sought by Respondent is moot since Complainant filed a response to Respondent’s Preliminary Objections.
4. Because Respondent’s motion is moot, it should be DENIED AS MOOT.
5. Notwithstanding the foregoing, Complainant reserves his rights, if any, to file an Amended Complaint in the future as the proceedings progress, consistent with the provisions of 52 Pa. Code § 5.91.

## CONCLUSION

Complainant prays that the Commission DENY AS MOOT Respondent's motion, since Complainant has responded to Respondent's Preliminary Objections.

Dated: **August 9, 2020**

\_\_\_\_\_  
/s/

Andrew Perrong  
*Complainant Pro-Se*  
1657 The Fairway #131  
Jenkintown, PA 19046  
Phone: 215-791-6957  
Facsimile: 888-329-0305  
andyperrong@gmail.com

## CERTIFICATE OF SERVICE

Pursuant to 52 Pa. Code § 1.54, I hereby certify that I served a copy of the foregoing via

E-Mail and First Class Mail, to:

Deanne O'Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8th Floor  
Harrisburg, PA 17101  
dodell@eckertseamans.com

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
2nd Floor, L-M West  
400 North Street  
Harrisburg, PA 17120  
bobbwillia@pa.gov

I also certify that I e-filed the foregoing with the Commission via their web portal.

Dated: **August 9, 2020**

\_\_\_\_\_  
/s/

Andrew Perrong  
*Complainant Pro-Se*  
1657 The Fairway #131  
Jenkintown, PA 19046  
Phone: 215-791-6957  
Facsimile: 888-329-0305  
andyperrong@gmail.com