

September 10, 2020

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Secretary Rosemary Chiavetta & Honorable Judge Steven Haas
Pennsylvania Public Utilities Commission
400 North Street 2ndFloor West
Harrisburg, PA 17120

RE: Dorca Mejia v. PPL Electric Utilities Corporation
Docket no: F-2020-3019000

Subject:

Reply Briefing Order:

As a response to this briefing, I consider that my case is different because it is in regard to an apartment that was already inspected by PPL. I brought forth evidence in court, during the hearing on June 23, 2020 that I have complied with the law of Act 54 1993 in 2014 and did not complain about my responsibility as the owner. My defense is against the report PPL has on record that shows Mr. Harris found a receptacle working when it was not. That report has been recorded as foreign load when, in my property, the foreign load was already fixed. That is why I am disputing the charges for \$ 8, 287.87.

In this response I would like to take this opportunity to clarify the confusion I had when I opened my informal complaint with PUC: For instance, I could not understand why PPL Electric Utilities was trying to make me responsible again for the foreign wiring, Act 54 for Apt #1, the same Apartment had the foreign load. That is why I requested for PUC to ask PPL to release my records. PPL responded to PUC that they had no information regarding past investigations on my property before this new claim in 2018. Luckily, I had kept the old paperwork from the investigation conducted by PPL in 2014 and submitted it as evidence for this case.

The evidence I showed in the hearing:

I showed evidence that in 2014, PPL Electric utilities inspected my property 37 Broad street apt 1#, #2 and #3. The issue found was for a foreign load for Apt #1, which was fixed. In the second investigation in 2018 Anthony Harris reported to PPL there was a receptacle working connected to Apt # 1, the same Apt #1 PPL reported the foreign load in 2014. But PPL Instead of verifying the record from my previous case and verifying if the information was correct or not, PPL recorded what Mr. Harris reported. I showed that Gelson Colon made the correction of “wire removed” from Apt #1 but did not write the description of a receptacle because Gelson did not find any receptacle working as Mr. Harris reported.

PPL Brief:

“Mr. Harris was clear – the outlet was available for use by the tenant, should the tenant have so desired. There was no covering or capping of the outlet on the date of the inspection”.

My Response:

That is a good point that you brought up. If the outlet was available to be seen in the kitchen in Apt #3 why didn't the investigator of PPL never report that in 2014. PPL made me responsible for the foreign load in Apt #1 and the letter did not mention any outlet. That is part of the job of an investigator to report everything that is wrong in a property when it is investigated. As you said in the brief: “There was no covering or capping of the outlet on the date of the inspection”. That means for me that there is nothing to hide in my property. Honore Pierre testified in the hearing that the receptacle was not working, and he had to use others in the Apt #3.

PPL Brief:

“The testimony at the hearing was clear. PPL Electric received a report of suspected foreign writing and Customer Contact Representative Anthony Harris

performed a timely inspection, accompanied at all relevant times by Complaint's property manager, Gelson Colon. The rented apartment owned by Complainant contained an outlet that when inspected registered a load. Even Complaint did not dispute that the load registered on the testifying device”.

My Response:

The only report that PPL recorded in my case was from Mr. Harris. PPL did not even pay attention to what Gelson Colon described in the Form of Act 54 1993. He wrote “Removed wire” from Apt # 1. Gelson explained in the hearing on June 23 that there was not any receptacle from Apt #3 that registered usage to Apt #1. He explained that the wires connected to the receptacle were dead and disconnected from all power sources. That is clear enough to understand that my property did not have any new foreign load as reported to me by PPL in 2018. Also, Honore Pierre confirmed it, he noticed that the receptacle was not working right when he moved in. PPL brief said that: I “did not dispute that the load registered on the testifying device”. My response: What load can be in a device that has no power or is disconnected from all power sources? Gelson testified and explained it in the court.

My point of view for my case against PPL Electric Utilities:

The investigation made by PPL for my property 37 Broad Street Apt #1, #2 and #3 has been defective and PPL quickly blamed me, the owner of the property for their mistakes. I noticed that PPL did not show that they have any obligation or any rule to follow when investigating a property. PPL neither investigated my property correctly nor verified if the report provided by Anthony Harris matched Gelson’s report of description of correction was made in the property. That is a defective investigation and to be honest, I am a victim of the defective system PPL has. Another good example is the case of Honore Pierre, the tenant who opened the complaint. PPL Increased Honore Pierre electricity without any reasonable explanation. Honore had to move because he could not pay his bill that used to be ranged from \$ 50-60, but then increased to about \$ 200.00 by PPL. Proof for this is, Anthony Harris did not find anything wrong in Apt# 3 where Honore lived from December 2016 to August 2018.

In Conclusion:

I am kindly asking Pennsylvania Public Utility Commission that check all evidence in my case. I should not be responsible for the charges of 8,237.87. If PPL made the mistake of two defective investigations and made wrong reports in my property, that should not be my responsibility as the owner. PPL should own up to their own mistakes and if PPL cannot put the bill back to the tenant of Andrene Tutko for any reason, then PPL should be responsible for the amount. I, Dorca Mejia, respect the Law of Act 54 1993, which I fully complied when PPL made me responsible in 2014.

CERTIFICATE OF SERVICE

Docket Number: Docket no: F-2020-3019000

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 5.14 (*relating to service by party*).

The Certificate of Service is a notification to the parties to the case of the Exception or Brief, etc. that you are submitting for filing.

(List names and addresses of parties and the way each was served such as; USPS, Email, Fax, Mail Service.

*Honorable Steven K. Haas
Kimberly A. Klock
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Dated this September day of 10th, 2020.

Dorca Mejía
(Signature)