

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**NOTICE TO PLEAD**

**TO: FRONTIER UTILITIES NORTHEAST, LLC**

c/o: Deanne M. O'Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8th Floor  
Harrisburg, PA 17101

You are hereby notified that any response or objection to the enclosed subpoena application shall be filed with the Pennsylvania Public Utility Commission with a copy served to Complainant, Andrew R. Perrong, and the Administrative Law Judge presiding over the proceeding within ten (10) days of service hereof:

File with:\*  
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

With a copy to:  
Hon. Elizabeth Barnes  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 19105-3265

\*Due to the COVID-19 pandemic, the Pennsylvania Public Utility Commission is encouraging individuals to eFile documents. Information regarding eFiling with the Commission is available at <https://www.puc.pa.gov/efiling/default.aspx>.

Dated: **October 9, 2020**

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

Andrew Perrong  
*Complainant Pro-Se*

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**APPLICATION FOR A SUBPOENA TO DATA EXCHANGE, INC D/B/A TPV.COM**

Complainant ANDREW PERRONG hereby requests that the Commission issue a subpoena to Data Exchange, Inc d/b/a TPV.com:

1. Through this subpoena, the Plaintiff is seeking:
  - (i) recording(s) of any calls associated with TPV ID 419148521;
  - (ii) all documents related to TPV ID 419148521, including all records showing when the TPV occurred, the length of the TPV, and any other internal records related to the TPV; and
  - (iii) all documents sufficient to identify the source of the TPV ID 419148521, including the identity of Vendor Number 36 or agent ID NGETQS5006 "Jordan Smith".
  
2. The information is relevant because Respondent states in their Motion for Summary Judgment, and is expected to argue at the hearing, that the TPV process was unsuccessful and did not occur as Plaintiff has alleged in his complaint and supplemental narrative.
  
3. The information is also relevant because Respondent states in in their Motion for Summary Judgment, and is expected to argue at the hearing, that the vendor who submitted the TPV was not authorized to do so.

4. The evidence sought is therefore probative as to the material facts surrounding the illegal calls Plaintiff received from or on behalf of the Respondent, including whether or not the person who called Complainant was an agent of the Respondent, as defined in 52 Pa. Code 111.3(b).

### **CONCLUSION**

Complainant prays that the Commission issue a subpoena to Data Exchange, Inc d/b/a TPV.com compelling the limited production of the documents outlined in Paragraph 1, *supra*.

Dated: **October 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

Hon. Elizabeth Barnes  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 19105-3265

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

Dated: **October 9, 2020**

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

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*Complainant Pro-Se*  
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