

John Kline
5611 Stradford drive
Harrisburg, PA 17112

October 29, 2020

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: John Kline v. PPL Electric Utilities Corporation
Docket No. C-2017-2621072**

Dear Secretary Chiavetta:

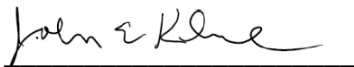
Enclosed please find the Kline (the “Complainant”) objection to PPL Electric Utilities (“PPL” or the “Company”) Motion to Stay the Proceeding in the above-referenced proceeding.

In PPL’s Motion to Stay they requested that the Commission: (a) require any Answers to the enclosed Motion be filed within two (2) calendar days

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Date: October 29, 2020

A handwritten signature in cursive script that reads "John Kline". The signature is written in black ink and is positioned above a horizontal line.

John Kline

Enclosures

cc: Office of Special Assistants

Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a Participant).

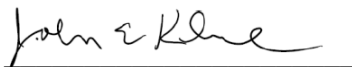
VIA E-MAIL

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Attorneys for PPL Electric Utilities Corporation

Date: October 29, 2020



John Kline

cc: Office of Special Assistants

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

John Kline,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2017-2621072
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

OJECTIONS TO THE MOTION TO STAY THE PROCEEDING

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

John Kline (the “Complainant”) hereby files this Objection to the Motion to Stay the Proceeding pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) regulations at 52 Pa. Code §§ 1.15(a)(1) and 5.103. The Complainant objects to PPL’s request to expedite a response of two calendar days to facilitate a ruling since it is not enough time to properly answer all objections. 52 Pa. Code § 5.103 (c) clearly states, *Response to motions*, a party has 20 days from the date of service within which to answer or object to a motion unless the period of time is otherwise fixed by the Commission or the presiding officer.

Since the Petition for Reconsideration in C-2017-2621072 has already been granted by the Commission, **OPINION AND ORDER ADOPTED:** October 29, 2020, an expedited ruling on the motion to stay is no longer reasonable or appropriate and the Commission must deny the

motion in whole or allow the Complainant the proper amount of time to respond. Although the two (2) calendar period is not sufficient for the Complainant to supply a proper cohesive response, due to professional and personal commitments, I will outline some objections, in brief:

- I. It was never my intent to persuade the Commission to stay all smart meter dispute cases while awaiting a decision by the Supreme Court on Povacz. My use of the term “process” was meant to describe the act of the duration of time until the Commission made their decision to appeal and the actual filing of the appeal and not to be confused with the duration of the appeal itself until ruling. In addition, the complainant never suggested that a stay should happen while the Commission issues its final orders on remand. As of this moment none of these details or plans are known by either me or PPL.
- II. While I agree that there may be “substantial uncertainty” that exists in as far as the ability of the Commission to adjudicate disputes such as mine due to possible administrative changes that may have to take place prior to or during adjudication, I do not agree that it would be necessary for Pennsylvania EDCs to modify and revise their existing smart meter deployment plans and tariffs since the Commission has it within their power to grant reasonable accommodations based on the Povacz Commonwealth Court decision.
- III. It would be improper and a burden on this Complainant to have to wait a potential indefinite period of time before there can be any type of accommodation that answers any of the concerns brought up in the petition for reconsideration. How is this balancing the needs of all parties involved?

IV. Complainant averse with PPL's assessment that the process will be prompt and efficient.


On the contrary I assert that operating on suppositions as stated in paragraphs 18-22,25-26 is insufficient reasoning to request a stay.

CONCLUSION

WHEREFORE, John Kline respectfully requests that the Pennsylvania Public Utility Commission denies this motion in whole or at minimum, deny the expedited response request, to allow for a proper response from the Complainant.

Respectfully submitted,

Date: October 29, 2020

A handwritten signature in cursive script, appearing to read "John Kline", is written above a horizontal line.

John Kline