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November 5, 2020

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Andrew Perrong v. Frontier Utilities Northeast LLC  
Docket No. C-2020-3019899

Dear Secretary Chiavetta:

Enclosed for electronic filing please find a Joint Motion to Approve Stipulation and Remove from the Public Record Exhibits A and C Attached to Complainant's Memorandum of Law in Opposition to Frontier Utilities Northeast LLC's Motion for Summary Judgment in the above matter. Copies to be served in accordance with the Certificate of Service.

Sincerely,

A handwritten signature in blue ink that reads "Deanne M. O'Dell".

Deanne M. O'Dell, Esq.

DMO/lww

Enclosure

cc: Hon. Elizabeth Barnes w/enc.  
Cert. of Service w/enc.

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the Joint Motion to Approve Stipulation and Remove from the Public Record Exhibits A and C Attached to Complainant's Memorandum of Law in Opposition to Frontier Utilities Northeast LLC's Motion for Summary Judgment upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

### **Via Email Only**

Andrew Perrong  
1657 The Fairway, Suite 131  
Jenkintown, PA 19046  
[andyperrong@gmail.com](mailto:andyperrong@gmail.com)

Hon. Elizabeth Barnes  
Administrative Law Judge  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[ebarnes@pa.gov](mailto:ebarnes@pa.gov)



Date: November 5, 2020

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Deanne M. O'Dell, Esquire  
Attorneys for  
Frontier Utilities Northeast LLC

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANDREW PERRONG,	:	
Complainant	:	
	:	Docket No. C-2020-3019899
v.	:	
	:	
FRONTIER UTILITIES NORTHEAST LLC,	:	
Respondent	:	

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**JOINT MOTION TO APPROVE STIPULATION AND REMOVE FROM THE PUBLIC  
RECORD EXHIBITS A AND C ATTACHED TO COMPLAINANT’S MEMORANDUM  
OF LAW IN OPPOSITION TO FRONTIER UTILITIES NORTHEAST LLC’S MOTION  
FOR SUMMARY JUDGMENT**

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Frontier Utilities Northeast LLC (“Frontier”) and Andrew Perrong (“Complainant”) (collectively, “Joint Petitioners”) respectfully request the attached proposed form of order be entered in this proceeding directing the Secretary of the Commission to remove from the public record Exhibits A and C attached to Complainant’s Memorandum Of Law In Opposition To Frontier Utilities Northeast LLC’s Motion For Summary Judgment (“Memorandum”) filed on October 26, 2020.

In support of this motion, Joint Petitioners represent as follows:

**Procedural Background**

1. Frontier is licensed as an electric generation supplier by the Commission to provide electric generation supply services to residential and small commercial (25 kW and under demand) customers in the electric distribution company service territories within the Commonwealth, including (but not limited to) that of PECO Energy Company.
2. On May 25, 2020, Complainant filed a Formal Complaint against Frontier and an Amended Formal Complaint was filed on June 26, 2020.

3. On October 6, 2020, Frontier filed a Motion for Summary Judgment and on October 26, 2020, Complainant filed an Answer to Frontier's Motion for Summary Judgment and his Memorandum.
4. On October 28, the Commission denied Frontier's Motion for Summary Judgment. In her opinion, the Administrative Law Judge made no reference to Exhibits A or C.
5. On November 2, 2020, Frontier filed a Motion to Strike Exhibits A and C attached to Complainant's Memorandum.
6. The Joint Petitioners subsequently agreed on a framework to resolve the Amended Formal Complaint. In light of this, the parties have agreed to stipulate to the removal of Exhibits A and C of the Memorandum from the public docket by the Commission's Secretary.
7. To effectuate this agreement, Joint Petitioner's respectfully request the entry of the attached proposed form of order.
8. Approval of this Motion is in the public interest because it resolves Frontier's Motion and is the result of an agreement between the parties.

WHEREFORE, for all the foregoing reasons, Joint Petitioners respectfully request that Your Honor grant this Motion and issue the attached form of order.

[Signature Block Follows]

Respectfully submitted,



Deanne M. O'Dell, Esq.  
(PA Atty I.D. 80614)

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Counsel for Frontier Utilities Northeast LLC

Dated: November 4, 2020



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*Complainant Pro-Se*

## **Attachment A**

### **Text of Proposed Order**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANDREW PERRONG, :  
Complainant :  
 : Docket No. C-2020-3019899  
v. :  
 :  
FRONTIER UTILITIES NORTHEAST LLC, :  
Respondent :

**ORDER DIRECTING SECRETARY TO REMOVE EXHIBITS A AND C FROM  
COMPLAINANT’S MEMORANDUM OF LAW IN OPPOSITION TO FRONTIER  
UTILITIES NORTHEAST LLC’S MOTION FOR SUMMARY JUDGMENT**

Upon consideration of the Motion to Approve Stipulation that was filed by Frontier Utilities Northeast LLC (“Frontier”) and Complainant Andrew Perrong (“Complainant”):

The Motion is GRANTED.

IT IS HEREBY ORDERED:

1. Exhibits A and C to attached to Complainant’s Memorandum Of Law In Opposition To Frontier Utilities Northeast LLC’s Motion For Summary Judgment are hereby struck from the public record in this proceeding.
2. The Secretary of the Commission shall remove from the public record Exhibits A and C attached to Complainant’s Memorandum Of Law In Opposition To Frontier Utilities Northeast LLC’s Motion For Summary Judgment filed on October 26, 2020.
3. Frontier Utilities Northeast LLC’s Motion To Strike Exhibits A and C Attached To Complainant’s Memorandum Of Law In Opposition To Frontier Utilities Northeast LLC’s Motion For Summary Judgment filed on November 2, 2020 is moot.

Dated:

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Elizabeth H. Barnes  
Administrative Law Judge