

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

600 SCRANTON LLC

V.

**PPL ELECTRIC UTILITIES CORPORATION
C-2019-3014952**

COMPLAINANT'S MOTION FOR CONTINUANCE OF FEBRUARY 9, 2021 HEARING

AND NOW, comes the Complainant, 600 Scranton LLC, by and through its Counsel, Thomas J. Jones Jr. Esquire, of Thomas J. Jones, Jr. P.C. moving for the Continuance of the Hearing scheduled before Administrative Law Judge, Dennis Buckley, on February 9, 2021 pursuant to 52 Pa. Code § 1.15 and setting forth the following in support thereof:

1. On December 13, 2019, Complainant filed a Formal Complaint against Respondent, PPL Electric Utilities Corporation (hereinafter PPL or Respondent).

2. On January 2, 2020, Attorney Kimberly G. Krupka on behalf of Respondent, PPL filed an Answer to the Complaint.

3. A Hearing on the Formal Complaint is scheduled for February 9, 2021 before ALJ Dennis Buckley.

4. On November 5, 2020 Complainant served upon Counsel for Respondent, Complainant's First Set of Interrogatories and Motion for Production of Documents.

5. On January 8, 2021, Respondent served upon Complainant an Answer and Objections to the 1st Set of Interrogatories and Motion for Production of Documents.

6. On January 25, 2021, Complainant's Counsel, phoned Counsel for Respondent to discuss informal resolution of Discovery issues and concurrence in a mutual request for a Continuance of the Hearing scheduled February 9, 2021. Respondent's Counsel stated she did not have authorization at that time to agree to the Continuance and would reply later after communication with Respondent.

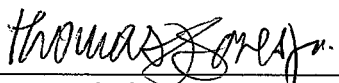
7. As of this date, February 1, 2021, Complainant's Counsel has received no Reply from Respondent regarding the Request for Continuance, and, mindful of the limitation on Applications for Continuance of Hearings, 52 Pa. Code § 1.15 and ALJ Buckley Pre-Hearing Order, Complainant requests a sixty (60) day Continuance of the Hearing scheduled for February 9, 2021 in order to complete Discovery inclusive of the Deposition of PPL Commercial Account Manager, Brian Stafford.

8. That given the nature of Respondent's answers, response and objections to Complainant's formal discovery, Complainant is now required to pursue further action in which to properly develop its case for a hearing.

9. Failure to receive a continuance of the aforementioned hearing of February 9, 2021 will prevent Complainant from being adequately prepared for a hearing, all to its great detriment and prejudice.

WHEREFORE it is respectfully requested the Complainant's Application for Continuance of Hearing Scheduled February 9, 2021 be granted, then scheduled for Hearing sixty (60) days thereafter to permit the conclusion of Pre-Hearing Discovery.

THOMAS J. JONES, JR., PC

By: 
Thomas J. Jones, Jr., Esquire
Counsel for Complainant,
600 Scranton LLC


CERTIFICATE OF SERVICE

I, THOMAS J. JONES Jr., hereby certify that I have served the foregoing Claimant's Motion for Continuance of February 9, 2021 Hearing on the individual at the address set forth below via electronic service.

Kimberly G. Krupka, Esq.
GROSS McGINLEY LLP
33 South 7th Street PO Box 4060
Allentown, PA 18105-4060
KKrupka@grossmcginley.com

THOMAS J. JONES, JR., PC

Date: February 1, 2021


By: _____
Thomas J. Jones Jr., Esquire
Counsel for Complainant,
600 Scranton LLC