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April 15, 2021

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

RE: Allen Ulrich v. PPL Electric Utilities Corporation
Docket No: C-2021-3024839

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter are Preliminary Objections on behalf of PPL Electric Utilities Corporation.

Please note that this filing was eFiled with the Commission on the date indicated above.

Very truly yours,



KIMBERLY G. KRUPKA

KGK/tb

Enclosure

cc: Allen Ulrich (w/enc.)
Michelle L. Bartolomei (w/enc.) *via email only*
Shelbie Frederick Bayda (w/enc.) *via email only*
01587762.DOCX

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ALLEN ULRICH,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2021-3024839

NOTICE TO PLEAD

TO: Allen Ulrich
1661 Washington Avenue, 1st Floor
Northampton, PA 18067

Pursuant to 52 Pa. Code Section 5.101(d), you are hereby notified that you have ten (10) days from the date of service of the within Preliminary Objections in which to respond, and that if you fail to so respond within ten (10) days from the date of service, Respondent's Preliminary Objections may be granted without further notice.

GROSS MCGINLEY, LLP



BY:

KIMBERLY G. KRUPKA, ESQUIRE

ID No: 83071

Attorney for Respondent

PPL Electric Utilities Corporation

33 S. Seventh Street; P O Box 4060

Allentown PA 18105-4060

Ph. (610) 820-5450; Fax (610) 820-6006

Date: April 15, 2021

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ALLEN ULRICH,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2021-3024839

PRELIMINARY OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION

PPL Electric Utilities Corporation (hereinafter “PPL Electric”), by and through its counsel, hereby makes the following Preliminary Objections pursuant to Section 5.101(a)(5) Title 52 of the Pennsylvania Code, 52 Pa. Code §5.101(a)(5) and contemporaneously with the filing of these Preliminary Objections, PPL Electric has filed an Answer to the Complaint with New Matter which is incorporated herein by reference, as though set forth fully at length:

1. Complainant is Allen Ulrich (hereinafter “Complainant”).
2. Respondent is PPL Electric.
3. Complainant’s Complaint, in Paragraphs 4 and 5 when read together, make allegations that PPL Electric issued a refund check to his deceased partner in relation to electric service provided to 1661 Washington Avenue, 1st floor, Northampton, PA. As Complainant’s partner was deceased, Complainant alleges he could not cash the refund check and PPL Electric refused to change the name on the refund check to Complainant’s name.
4. Complainant was not a ratepayer of record for the property located at 1661 Washington Avenue, 1st floor, Northampton, PA 18067.
5. Complainant has never alleged or stated that he is either the Executor or Administrator of the Estate of Rebecca Jonney (the former ratepayer as identified by Complainant).

6. Complainant does not allege that Complainant made direct payment to PPL Electric on the account servicing 1661 Washington Avenue, 1st floor, Northampton, PA 18067.

7. Where Complainant is neither a ratepayer of record nor the person who issued the payment on the account, Complainant has no standing to bring a claim against PPL Electric for a refund on another ratepayer's account.

WHEREFORE, in view of the foregoing, PPL Electric respectfully requests that the Pennsylvania Public Utilities Commission grant PPL Electric's Preliminary Objections to dismiss the Complaint for lack of jurisdiction.

GROSS MCGINLEY, LLP

BY: 

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Ph. (610) 820-5450; Fax (610) 820-6006

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CERTIFICATE OF SERVICE

This is to certify that the PRELIMINARY OBJECTIONS on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record on behalf of Respondent by electronic mail and first class United States mail, postage on this the 15th day of April, 2021.

ALLEN ULRICH
1661 WASHINGTON AVENUE, 1ST FLOOR
NORTHAMPTON, PA 18067

GROSS MCGINLEY, LLP



BY: _____

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