

**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

DOCKET No. C-2020-3019763

Lawrence Kingsley,
Complainant

v.

PPL Electric Utilities,
Respondent

PARTIES' JOINT MOTION FOR CONTINUANCE

1. On May 5, 2021—one day before the telephonic hearing—each party served the other with submissions which could affect the trajectory of this case, but the court's April 6, 2021 notice requires documents or exhibits to be served five days before this hearing.
2. Before any hearing, each party would like an opportunity to reply to the other side about these new submissions.
3. Accordingly, for judicial economy and their own convenience, both parties request a continuance of the May 6 hearing for thirty days or for whatever period the court finds convenient.

Dated: May 5, 2021

Respectfully submitted,
The undersigned parties:

/S/

Lawrence Kingsley
2161 West Ridge Drive
Lancaster, PA 17601
646-543-2226

/S/

Kimberly G. Krupka, Esq.
Gross McGinley, LLP
33 S Seventh Street
PO Box 4060
Allentown, PA 18105-4060
(610) 871-1325

Certificate of Service

I hereby certify that on May 4, 2021 I emailed a true copy of the
within papers to PPL's counsel:

Kimberly G. Krupka, Esq.
Gross McGinley, LLP
33 S Seventh Street, PO Box 4060
Allentown, PA 18105-4060

Respectfully submitted,

/S/

Lawrence Kingsley
2161 West Ridge Drive
Lancaster, PA 17601
646-543-2226

EXHIBITS

Docket Number	C-2020-3019763
Case Description	Lawrence Kingsley v. PPL Electric Utilities
Transmission Date	5/5/2021, 8:39:02 AM
Filed On	5/5/2021, 8:39:02 AM
eFiling Confirmation Number	2114729

Uploaded File List

File Name	Document Type	Upload Date
Renewed Motion to Strike--Filed.pdf	Motion	5/5/2021 8:37:55 AM
Motion to Compel Discovery and New Motion for Sanctions--Filed.pdf	Motion	5/5/2021 8:38:20 AM

OMITTED:

Reasonable advance warning of vegetation management would not prevent PPL from conducting necessary maintenance, but only give property owners an opportunity to oppose excessive or unnecessary work. PPL's contractors have no loyalty to the property owner and go out of their way to keep PPL happy for PPL is an extremely valuable customer for them. Routinely, they therefore tend toward excess, which must be questioned before the harm is inflicted.

[Before PPL irreparably and again damages private property, PUC should mandate a verifiable form of notice for intended vegetation management, granting the complainant adequate time to marshal expert opinion and to seek a hearing about the scope of work intended by PPL.]

1. The rest of the report may be misleading as well and PPL's refusal to disclose it suggests an attempt to conceal distortion and backstabbing.

Judge Rainey's order was dated June 10, 2020.

[“For too long PPL's Boston owners have acted as overlords trying to colonize Pennsylvania and overrule local interests. PPL's ability to invade private property without warning and to demolish, jeopardize, or diminish assets like shade trees and shrubbery or to poison wells with herbicides is dangerously totalitarian. The tariff purporting to give PPL this right is far too broad and is unconstitutional under Article I of Pennsylvania's Constitution.]

filing misleading data, and disclosing unwarranted, personal information about the complainant (re: unattested exhibits),

Lawrence Kingsley

From: Kimberly Krupka <KKrupka@grossmcginley.com>
Sent: Wednesday, May 5, 2021 4:54 PM
To: Lawrence Kingsley
Subject: Agreement to Motion for Continuance

I am in agreement with your filing of the Motion for Continuance.



Kimberly G. Krupka / Partner
Gross McGinley, LLP
Office: 610.871.1325 (direct) / Fax: 610.820.6006
33 S Seventh Street, PO Box 4060
Allentown, PA 18105-4060
[Download vCard](#)
grossmcginley.com



NOTICE: This message, and any attached file, is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the individual reading this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this message is strictly prohibited. Nothing in this e-mail message should be construed as a legal opinion. If you have received this message in error, please notify me immediately by replying to this e-mail and delete all copies of the original message. Thank you.

IRS CIRCULAR 230 DISCLOSURE: Pursuant to Treasury Regulations, any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used or relied upon by you or any other person, for the purpose of (i) avoiding penalties under the Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any tax advice addressed herein.