

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Andrew Perrong

:

v.

:

Docket # C-2021-3024359

:

Alpha Gas & Electric LLC

:

:

NOTICE TO PLEAD

TO: ALPHA GAS & ELECTRIC LLC

c/o: Karen O. Moury, Esquire

Eckert Seamans Cherin & Mellott, LLC

213 Market Street, 8th Floor

Harrisburg, PA 17101

Pursuant to 52 Pa. Code § 5.343(f), you are hereby notified that any objections to the enclosed Deposition Notice must be filed within ten days of service thereof upon you. Moreover, pursuant to 52 Pa. Code § 5.343(e), you must file within ten days of service a designation of one or more officers, directors or managing agents, or other persons who consent to testify on its behalf, and may set forth, for the persons designated, the matters on which he will testify.

All pleadings must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to Complainant, Andrew Perrong, and where applicable, the Administrative Law Judge presiding over the proceeding.

File with:*

Hon. Charece Z. Collins, Administrative Law
Judge & Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105
charcollin@pa.gov

With a copy to:

Andrew Perrong
1657 The Fairway #131
Jenkintown, PA 19046
andyperrong@gmail.com

*Due to the COVID-19 pandemic, the Pennsylvania Public Utility Commission is encouraging individuals to eFile documents. Information regarding eFiling with the Commission is available at <https://www.puc.pa.gov/efiling/default.aspx>.

Dated: **May 12, 2021**

/s/

Andrew Perrong, *Complainant Pro-Se*

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Andrew Perrong	:	
	:	
v.	:	Docket # C-2021-3024359
	:	
Alpha Gas & Electric LLC	:	

DEPOSITION NOTICE

Pursuant to the procedures set forth in 52 Pa. Code §§ 5.343, 5.344 and 5.346, **PLEASE TAKE NOTICE** that Complainant ANDREW PERRONG will take the deposition of Respondent **ALPHA GAS & ELECTRIC LLC**, commencing at **10:00 AM**, on **June 2, 2021**, at **Magna Legal Services, 1635 Market Street, 8th Floor Philadelphia, PA 19103**. The deposition will be taken upon oral examination before a duly authorized notary public or other officer authorized or person commissioned to administer oaths at deposition and will be recorded by stenographic means. **The deposition will be conducted virtually via video recording because of the COVID-19 Pandemic.** The deposition shall and will continue from time to time until completed, not to exceed on record examination time of eight hours.

Pursuant to 52 Pa. Code § 5.343(c), the purpose of the deposition is to inquire about matters, in preparation for the Initial Telephonic Hearing and possible Motion for Summary Judgment in this matter, related to: the Complainant, the allegations in the Formal Complaint, Respondent’s investigations to the allegations therein, Respondent’s marketing practices, policies, and procedures, Respondent’s use of third-party vendors to conduct marketing, Respondent’s use of third-party overseas call centers, and Respondent’s efforts to comply with the Utility Code with respect to its marketing efforts, particularly with respect to telemarketing.

Pursuant to 52 Pa. Code § 5.343(d), please bring with you for production at the deposition documents related to: the Complainant, the allegations in the Formal Complaint, Respondent's investigations to the allegations therein, Respondent's marketing practices, policies, and procedures, Respondent's use of third-party vendors to conduct marketing, Respondent's use of third-party overseas call centers, and Respondent's efforts to comply with the Utility Code with respect to its marketing efforts, particularly with respect to telemarketing.

Pursuant to 52 Pa. Code § 5.343(e), this notice is directed to Respondent Alpha Gas & Electric LLC. Accordingly, you shall file, within ten days of service, a designation of one or more officers, directors or managing agents, or other persons who consent to testify on its behalf. You may set forth, for the persons designated, the matters on which he will testify.

Dated: **May 12, 2021**

_____/s/_____

Andrew Perrong
Complainant Pro-Se
1657 The Fairway #131
Jenkintown, PA 19046
Phone: 215-791-6957
Facsimile: 888-329-0305
andyperrong@gmail.com

Pursuant to 52 Pa. Code § 5.344(a), this is an application for an order to take a deposition, notice of which is being served upon the Presiding Officer.

[Proposed] Order

Application granted.

So Ordered this _____ day of _____, 2021.

Hon. Charece Z. Collins
Administrative Law Judge

CERTIFICATE OF SERVICE

Pursuant to 52 Pa. Code § 1.54, I hereby certify that I served a copy of the foregoing via

E-Mail and First Class Mail, to:

Karen O. Moury, Esquire
Eckert Seamans Cherin &
Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
kmoury@eckertseamans.com

Rosemary Chiavetta,
Secretary
Pennsylvania Public Utility
Commission
PO Box 3265
Harrisburg, PA 17105

Hon. Charece Z. Collins
Administrative Law Judge
Pennsylvania Public Utility
Commission
PO Box 3265
Harrisburg, PA 17105
charcollin@pa.gov

I also certify that I e-filed the foregoing with the Commission via their web portal.

Dated: **May 12, 2021**

/s/

Andrew Perrong
Complainant Pro-Se
1657 The Fairway #131
Jenkintown, PA 19046
Phone: 215-791-6957
Facsimile: 888-329-0305
andyperrong@gmail.com