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June 10, 2021

The Hon. Dennis J. Buckley
Public Utility Commission
400 North Street
Keystone Bldg.
Harrisburg, PA 17120

Re: Amended Complaint

Your Honor:

Thank you for your email, which I received only last night. I appreciate your input. In consonance with your order, I am refileing my documents that first were submitted on May 26. I assume that I should email you fresh copies even though this material already should be familiar—please let me know if I am mistaken in this respect.

I do not know what has been reported to you, but the following facts are worth consideration.

On June 2 I learned that PUC rejected my Amended Complaint because someone wrongly thought, despite my cover letter, that I was trying to file a new complaint. I was told: “Please file the Amended Complaint as a Formal Complaint.”

In my June 2 letter to PUC I explained that the Amended Complaint could not foster a new complaint since Your Honor ordered it as part of our ongoing case. I thought that once the Secretary’s Bureau understood its obvious mistakes, it would correct them—*e.g.*, by adding to the record my May 26 submissions, which were perfectly OK.

Wanting to expedite this matter and uncertain how much attention my June 2 letter would receive, I telephoned the Secretary’s Bureau on June 3-4 and kept you and PPL apprised of the situation.

Only on June 7 was I able to reach anyone at PUC about this matter. I was still

hoping that PUC would reverse its decision about my May 26 submissions. However, as I related, Mr. Audley Brown at PUC told me to refile these documents as a single .pdf.

I could not do so for the reasons which I explained to him and listed in my June 7-8 letters to PUC. I wanted to refile these documents as I had on May 26, as separate files, not as a single unsorted, amorphous mass. On June 8 I wrote Ms. Shirley Spunaugle who had left me a voicemail message on June 7:

Mr. Brown's alternative—a single .pdf combining the Amended Complaint, three motions, a memorandum, affidavit, reply to the other side, cover letter, and certificates of service from contradictory periods—would create a jumble that will make me look like a fool for proceeding in this fashion. (The reply to PPL is now moot, but needed for completeness of the record.) I do not think that PUC should ask me to harm my case by looking witless and inexperienced in terms of normal pleading practice. Even if PUC is comfortable with a bizarre mélange of pleadings within a single document, I have to think about presenting a solid record if the other side appeals the final judgment in this case.

Ms. Spunaugle's June 8 instructions agree that the May 26 documents can be refiled as individual documents, not as a single file. My resubmission thus will be in this form.

The accusation that I have not cooperated with PUC staff is unjust. My June 7-8 letters speak for themselves, and my new submission will accord with Ms. Spunaugle's appended instructions. There nonetheless is a continuing problem inasmuch as she states: "Please submit your Amended Complaint under New Case – Formal Complaint." In filing an Amended Complaint, I have no intention of initiating a new case, and PUC should not force this result. Yet under your threat to dismiss the case unless the Amended Complaint is filed by noon today, I have no choice except to follow the Commission's instructions, and you already have told me to do so. Please note that the logical error, presenting an Amended Complaint as a new case, is not mine.

I believe that I am blameless, and someone at the Secretary's Bureau may be

seeking to deflect blame about the May 26 errors by inculcating me.

There is, however, plenty of fault in this case, and I hope that at some point Your Honor will consider PPL, not just me. PPL completely has ignored my Interrogatories, provided only an incomplete production of documents, failed to serve on me a copy of its report to Judge Rainey (which may have tarnished me behind my back); filed prejudicial exhibits without foundation, attestation, or any demonstrated purpose; retained at least \$2,000 of monthly payments that should be refunded to the estate which I manage; adopted a hard-knuckle approach to Pennsylvania towns which PPL has sued; incurred fines for pollution of the Susquehanna River; lost at least two court cases which have parallels to the instant case; inspired page after page of Better Business Bureau complaints, violated commitments to PUC about notifying residents of intended vegetation management; and precipitated this case though PPL's excesses, arrogance, and stubbornness.

Thank you for your attention and courtesy.

Sincerely yours,

/S/

Lawrence Kingsley

EXHIBIT

Lawrence Kingsley

From: Spunaugle, Shirley A <sspunaugle@pa.gov>
Sent: Wednesday, June 9, 2021 10:05 AM
To: Lawrence Kingsley
Subject: RE: [External] RE: Amended complaint filing with PUC

Mr. Kingsley,

In order to move your case along, we are making this one time exception to allow you to file the Amended Complaint separately from the other documents. Please submit your Amended Complaint under New Case – Formal Complaint. Ensure to place a Cover Letter on the amendment listing your docket number and you are filing per the Commission Order.

For the Motions and Reply, we will allow you to file these as individual attachments in one eFiling separate from the Amended Complaint as follows under Existing Case - Motion. Each Motion must have a Cover Letter explaining the filing followed by the Motion itself, any supporting information such as the Affidavit, any Exhibits to the Motion (such as previously filed documents referenced in the Motion), etc., followed by the Certificate of Service which are to be combined as 1 pdf document. The Reply must explain what you are replying to and can be a separate attachment. If the Memorandum is a free standing document it can also be filed as a separate attachment. Each is to be uploaded under the appropriate document type, meaning the Motions must be filed under Motion. If any documents do not have a specific document type for it, submit it under Letter.

I reiterate that your initial filing on May 26th was not acceptable as filed and it was not “wrongly rejected”. DO NOT submit your Motions and other supporting documents as initially filed separately as Cover Letter, Motion, Certificate of Service, Letter, etc. or it will be rejected. Your documents must be filed under the corresponding document type that matches your submittal as one document. Again, a Motion filing consists of a Cover Letter, the actual Motion, any supporting documentation to the Motion, followed by the Certificate of Service and submitted as one pdf document. Such filings with the Commission are not to be broken down into individual components.

Thank you,

Shirley Spunaugle
Division Manager – Secretary’s Bureau
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120
sspunaugle@pa.gov
www.puc.pa.gov

From: Lawrence Kingsley <file@research-1.com>
Sent: Tuesday, June 8, 2021 9:30 PM
To: Spunaugle, Shirley A <sspunaugle@pa.gov>
Subject: [External] RE: Amended complaint filing with PUC

***ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.*

Thank you. Please note: this question of filing an Amended Complaint in Case No. C-2020-3019763 arises only because PUC, despite my two cover letters, mistook my Amended Complaint that was ordered for a new complaint. That is, I filed the Amended Complaint pursuant to the court's May 6 order, and I now am only trying to get back to where I was on May 26 when my seven documents, plus cover letter, wrongly were rejected. Accordingly, please, would it suffice for me to file a single submission of the seven document and cover letter in question, whereby they all would have the same confirmation number, but would be listed separately—exactly as they originally were filed on May 26? Mr. Brown's alternative—a single .pdf combining the Amended Complaint, three motions, a memorandum, affidavit, reply to the other side, cover letter, and certificates of service from contradictory periods—would create a jumble that will make me look like a fool for proceeding in this fashion. (The reply to PPL is now moot, but needed for completeness of the record.) I do not think that PUC should ask me to harm my case by looking witless and inexperienced in terms of normal pleading practice. Even if PUC is comfortable with a bizarre mélange of pleadings within a single document, I have to think about presenting a solid record if the other side appeals the final judgment in this case. Thank you for your attention and courtesy.
Lawrence Kingsley
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