

**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

DOCKET No. C-2020-3019763

Lawrence Kingsley,
Complainant

v.

PPL Electric Utilities,
Respondent

**COMPLAINANT'S MOTION FOR CONTINUANCE,
DATED JUNE 24, 2021**

1. The complainant moves for continuance of the July 20, 2021 hearing.
2. As reason thereof, he states that, to prepare for this hearing, he needs discovery which PPL is still withholding from him.
3. Therefore, the next hearing should not be held until ten days after PPL surrenders the withheld discovery, or there should be no dispositive ruling about this case at the next hearing.

4. The complainant's Motion to Compel Discovery and Motion for Sanctions is one of the pending motions refiled on June 10, 2021.
5. In support of this motion the complainant appends the accompanying Affidavit.

Requested Relief

6. The complainant asks for a decision on all his pending motions before any dispositive hearing.

Dated: Lancaster, PA
June 24, 2021

Respectfully submitted,

/S/

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

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Lawrence Kingsley,
Complainant

v.

PPL Electric Utilities,
Respondent

**AFFIDAVIT IN SUPPORT OF MOTION FOR CONTINUANCE
DATED JUNE 22, 2021**

I, Lawrence Kingsley, complainant in the above-entitled action, being duly sworn, state as follows.

Procedural Background

I first propounded my Interrogatories to PPL on March 25, 2020. On May 6, 2021 the court denied my Motion to Compel Discovery and Motion for Sanctions on procedural grounds (failure to email Judge Buckley a copy of what had been efiled with the Commission). To this extent that I easily rectified this deficiency and was asking for reconsideration, I then refiled this motion on June 10, 2021.

Argument

As stated in the motion, PPL has not made the slightest effort to answer my Interrogatories, and PPL's production of documents was incomplete.

PPL intentionally withheld this information before my Amended Complaint was due. My Amended Complaint therefore should have been strengthened by the withheld information.

This information will illuminate such areas as PPL's scope and methods of vegetation management; PPL's non-public filings about vegetation management; lack of training by PPL's contractors who perform vegetation management; instructions or guidelines, if any, given to these contractors and specific information of how these instructions or guidelines were conveyed, if they were; other complaints against PPL regarding vegetation management and how these complaints were resolved, when they were, and when they were not, issues that were never resolved; documents on which PPL intends to rely at any hearing; PPL's lack of a right of way on my property; correspondence, phone calls, and email messages which PPL initiated or received from me during February 1, 2015 to the present; audio recordings or verbatim transcripts of phone calls with me (as opposed to purported summaries of these calls); PPL's unlawful billing practices at my address and the amount of overcharges; lack of justification for retaining the security deposit of the estate account which I manage at my address; and the lack of mediation in the parties' prior case (a subject of confusion in the current case).

Inasmuch as PPL's vegetation management, improper billing, and poor customer relations are pillars of my complaint, I should be able to flesh out these

issues with aid of discovery before any hearing about them.

The missing information should help to simplify and expedite the next hearing and therefore is in the interest of judicial economy.

Meanwhile, flagrant disregard of discovery obligations by PPL is not only indefensible, but tantamount to “thumbing its nose” at PUC procedures and, by implication, the court.

Here is yet another indication of PPL’s arrogant disregard of the rule of law and why I cannot trust PPL to honor its commitments.

Dated: Lancaster, PA
June 27, 2021

Respectfully submitted,

/S/

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

Certificate of Service

I hereby certify that on June 27, 2021 I emailed a true copy of the forgoing Motion 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/

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