

**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

DOCKET No. C-2020-3019763

Lawrence Kingsley,
Complainant

v.

PPL Electric Utilities,
Respondent

OPPOSITION TO PPL'S REPETITIOUS SUBMISSIONS

1. For the third time PPL has submitted the same or nearly the same set of exhibits.
2. These exhibits unnecessarily clutter the record since they already were efiled on 11/16/20 and on 4/21/21.
3. Once again, PPL has provided no framework for these exhibits, which thereby are irrelevant to any issue now before the court except for a single page which PPL already should have produced pursuant discovery.¹

¹ PPL ascribes its responsibility for notifying property owners of intended tree work to the contractor, who routinely avoids this expense. See p. 64 of PPL's third set of exhibits, submitted on July 13, 2021. See also p. 51 of PPL's previous set of exhibits.

4. Once again, PPL exhibits are one-sided, taken out of context, and largely a distraction from the root issues of this case.
5. These exhibits are not even filed correctly since they not only are unexplained, but unattested and undocumented. At best these exhibits should be redacted in terms of private information inappropriate for disclosure. Then the exhibits should be marked for identification, examined one by one during opposition procedure, and added to the record only by leave of the court. PPL is attempting an end run around normal evidentiary procedures.
6. PPL attempted another end run around the complainant's Renewed Motion to Strike these exhibits. The complainant incorporates that motion by reference since the same objections set forth therein apply to PPL's third, vexatious submission of the same material.
7. Although the court has now denied this Renewed Motion to Strike, the complainant believes that he should reassert his prior objections for the record and that they are worth reconsideration.
8. PPL's reliance on underhand methods, seen at every stage of this litigation, shows why PPL cannot be trusted to keep its commitments and why this Formal Complaint, as opposed to agreement which the parties reached in the complainant's Informal Complaint, is necessary.

Dated: Lancaster, PA
July 14, 2021

Respectfully submitted,

/S/

Lawrence Kingsley
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Certificate of Service

I hereby certify that on July 14, 2021 I emailed a true copy of the forgoing Motion to PPL's counsel:

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Respectfully submitted,

/S/

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