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August 5, 2021

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**RE: 600 Scranton, LLC v. PPL Electric Utilities Corporation**  
**Docket No: C-2019-3014952**

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is the Answer of Respondent, PPL Electric Utilities Corporation, to Complainant's Motion to Compel.

Please note that this filing was eFiled with the Commission on the date indicated above.

Very truly yours,

KIMBERLY G. KRUPKA

KGK/tb

Enclosure

cc: Administrative Law Judge Dennis J. Buckley (w/enc.) *via email only*  
Thomas J. Jones, Jr., Esquire (w/enc.) *via email and First Class mail*  
Michelle L. Bartolomei (w/enc.) *via email only*  
Shelbie Frederick Bayda (w/enc.) *via email only*

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

600 SCRANTON, LLC,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2019-3014952

**ANSWER OF RESPONDENT, PPL ELECTRIC UTILITIES CORPORATION, TO  
COMPLAINANT'S MOTION TO COMPEL**

TO: ROSEMARY CHIAVETTA:

AND NOW COMES the Respondent, PPL Electric Utilities Corporation ("PPL Electric"), by and through its counsel, Gross McGinley, LLP, and files the following Answer to Complainant's Motion to Compel, and in support thereof avers as follows:

1. Section A of Complainant's Motion to Compel appears to seek copies of the prior ratepayer's billing statements for a five year period. PPL Electric has already provided all billing history it has retained with regard to the prior ratepayer. In addition, Respondent, PPL Electric, has confirmed the tariff rate for the prior ratepayer. Accordingly, all discovery has been fully addressed.

2. Under specific objections and answers on Page 4 of Complainant's Motion, Complainant appears to request any and all notes and correspondence of Brian Stafford with regard to the account. Since the filing of this Motion by Complainant, Respondent has provided calendar details and task information relative to actions and communications by Mr. Stafford. No further responsive documents exist.

3. On Page 5, Section C of Complainant's Motion to Compel, it appears that Complainant seeks phone communications between PPL representatives and other representatives of Complainant. All correspondence with PPL employees was documented within the customer contacts which have already been produced. No further documentation exists.

4. On Page 5, Section D, it appears that Complainant is seeking correspondence, notes, records, memos, and other written documents relevant to the communication between Mr. Stafford and Mr. Polatchek. The only information retained by PPL Electric is that which is contained in the calendar notations and tasks of Mr. Stafford, which have been produced to Complainant.

WHEREFORE, where all documents have been provided, Respondent, PPL Electric, respectfully requests that the Motion be denied.

GROSS MCGINLEY, LLP



BY: \_\_\_\_\_

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Date: August 5, 2021

BEFORE THE  
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vs.

PPL ELECTRIC UTILITIES CORPORATION,

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COMPLAINT DOCKET

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**CERTIFICATE OF SERVICE**

This is to certify that the Answer of Respondent, PPL Electric Utilities Corporation, to Complainant's Motion to Compel was provided to the following on behalf of Respondent by email and/or first class United States mail, postage on this the 5<sup>th</sup> day of August, 2021.

Administrative Law Judge Dennis J. Buckley  
Commonwealth Of Pennsylvania  
Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor West  
Harrisburg, PA 17120

600 Scranton LLC  
c/o Thomas J. Jones, Jr., Esquire  
410 Spruce Street, Suite 301  
Scranton, PA 18503

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