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August 25, 2021

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

**RE: Gomattie Harilal v. PPL Electric Utilities Corporation**  
**Docket No: C-2021-3027573**

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter are Preliminary Objections on behalf of PPL Electric Utilities Corporation.

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

Very truly yours,



KARA M. BECK

KB/tb

Enclosure

cc: Gomattie Harilal (w/enc.)  
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**

GOMATTIE HARILAL,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2021-3027573

**NOTICE TO PLEAD**

TO: Gomattie Harilal  
106 Waterway Lane  
Stroudsburg, PA 18360

Pursuant to 52 Pa. Code Section 5.101(d), you are hereby notified that you have ten (10) days from the date of service of the within Preliminary Objections in which to respond, and that if you fail to so respond within ten (10) days from the date of service, Respondent's Preliminary Objections may be granted without further notice.

GROSS MCGINLEY, LLP

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

  
KARA M. BECK, ESQUIRE  
Attorney ID # 324451  
Attorney for Respondent  
PPL Electric Utilities Corporation  
33 S. Seventh Street; P O Box 4060  
Allentown PA 18105-4060  
Ph. (610) 820-5450; Fax (610) 820-6006

Date: August 25, 2021

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GOMATTIE HARILAL,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2021-3027573

**PRELIMINARY OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION**

PPL Electric Utilities Corporation (hereinafter “PPL Electric”), by and through its counsel, hereby makes the following Preliminary Objections pursuant to Section 5.101(a)(2) Title 52 of the Pennsylvania Code, 52 Pa. Code §5.101(a)(5) and contemporaneously with the filing of these Preliminary Objections, PPL Electric has filed an Answer to the Complaint, which is incorporated herein by reference, as though set forth fully at length:

1. Complainant is Gomattie Harilal (hereinafter “Complainant”).
2. Respondent is PPL Electric.
3. Complainant’s Complaint, in Paragraphs 4 (additional handwritten pages that follow Page 4) and 5 when read together, make allegations that PPL Electric made incorrect charges to the Complainant’s account (58679-89058) and refuse to provide her with an explanation of the alleged incorrect charges. Further, Complainant alleges that she filed informal complaints, but they were dismissed because PPL is racist. Complainant further indicates that PPL and a “white conspiracy judge” are conspiring together and refusing to provide account information to the Complainant.
4. Complainant previously filed a Complaint in 2019 (C-2019-3009714) alleging incorrect charges on her PPL account (58679-89058). A hearing was held and the Honorable Benjamin J. Myers issued a Final Order dated December 9, 2019 ordering the following:

3. That Gomattie Harilal, and her husband Kumar Harilal, are precluded from filing any further complaints with the Pennsylvania Public Utility Commission, whether of informal or formal nature, regarding the arrearages on Account No. 58679-89058 for electric service rendered by PPL Electric Utilities Corporation,

until such time as the entire outstanding account has been paid in full.

5. That the Commission staff, including the Commissions Bureau, shall reject any formal or informal complaint that Gomattie Harilal or her husband Kumar Harilal, or any person acting on their behalf, may attempt to file with the Commission, pertaining to Account No. 58679-89058, until the entire outstanding balance has been paid in full.

8. That failure to pay the outstanding account balance for Account No. 58679-89058 shall be deemed grounds for termination of service in accordance with Chapter 56 and 64 of the Commission's rules of administrative practice and Procedure.

A true and correct copy of the Final Order dated December 4, 2019 as "**Exhibit A.**"

5. Complainant has failed to pay the balance on Account No. 58679-89058 since the issuance of the Final Order.

6. As of April 26, 2021, there remains an outstanding balance in the amount of \$10,884.38.

7. Pursuant to Section 5.101(a)(2) Title 52 of the Pennsylvania Code, Respondent preliminarily objects to Claimant's allegations regarding PPL and its employees/agents as racists and conspirers. Such allegations are purely scandalous, impertinent, and wildly unfounded. As such, said language should be stricken from the Complainant's Complaint.

8. Further, based on the December 9, 2019 Order, Complainant is prohibited from filing the instant Complaint and said filing was docketed in error. As such, pursuant to Section 5.101(a)(5) Title 52 of the Pennsylvania Code, Complainant lacks standing to bring a claim against PPL Electric for any disputes made in connection with Account No. 58679-89058.

**[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]**

WHEREFORE, in view of the foregoing, PPL Electric respectfully requests that the Pennsylvania Public Utilities Commission grant PPL Electric's Preliminary Objections to dismiss the Complaint for lack of standing.

GROSS MCGINLEY, LLP

BY:   
\_\_\_\_\_  
KARA M. BECK, ESQUIRE  
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Attorney for Respondent  
PPL Electric Utilities Corporation  
33 S. Seventh Street; P O Box 4060  
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Ph. (610) 820-5450; Fax (610) 820-6006

Date: August 25, 2021

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

GOMATTIE HARILAL,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2021-3027573

**CERTIFICATE OF SERVICE**

This is to certify that the PRELIMINARY OBJECTIONS on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record on behalf of Respondent by First Class United States mail, on this the 25<sup>th</sup> day of August, 2021.

GOMATTIE HARILAL  
106 WATERWAY LANE  
STROUDSBURG, PA 18360

GROSS MCGINLEY, LLP

BY:



KARA M. BECK, ESQUIRE  
ID No: 324451  
Attorney for Respondent  
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Fax: (610) 820-6006

# **EXHIBIT “A”**

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17105-3265**

Gomattie Harilal

v.

PPL Electric Utilities Corporation

:  
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:  
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C-2019-3009714

**FINAL ORDER**

In accordance with the provisions of Section 332(h) of the Public Utility Code, 66 Pa. C.S. §332(h), the decision of Administrative Law Judge Benjamin J. Myers dated October 10, 2019, has become final without further Commission action;

THEREFORE,

IT IS ORDERED:

1. That the motion of PPL Electric Utilities Corporation to dismiss the complaint for failure to prosecute is granted.
2. That the complaint of Gomattie Harilal against PPL Electric Utilities Corporation at Docket No. C-2019-3009714 is dismissed with prejudice.
3. That Gomattie Harilal, and her husband Kumar Harilal, are precluded from filing any further complaints with the Pennsylvania Public Utility Commission, whether of an informal or formal nature, regarding the arrearages on Account No. 58679-89058 for electric service rendered by PPL Electric Utilities Corporation, until such time as the entire outstanding account balance has been paid in full.

4. That the filing of any complaint pertaining to the arrearages which are the subject of this proceeding shall be dismissed without further proceedings.

5. That Commission staff, including the Commission's Bureau of Consumer Services and the Secretary's Bureau, shall reject any formal or informal complaint that Gomattie Harilal or her husband Kumar Harilal, or any person acting on their behalf, may attempt to file with the Commission, pertaining to Account No. 58679-89058, until the entire outstanding account balance has been paid in full.

6. That the filing of any other pleadings in this case concerning the same subject matter shall not be deemed a stay on the implementation of this order.

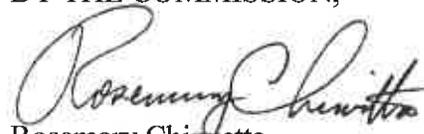
7. That PPL Electric Utilities Corporation shall file a notice with the Commission, with a copy to all parties to this proceeding, at Docket No. C-2019-3009714, within seven (7) days of the date that outstanding balance for Account No. 58679-89058 has been paid in full.

8. That the failure to pay the outstanding account balance for Account No. 58679-89058 shall be deemed grounds for termination of service in accordance with Chapters 56 and 64 of the Commission's rules of administrative practice and procedure.

9. That a copy of this decision shall be served to the Commission's Bureau of Consumer Services and the Secretary's Bureau.

10. That the case at Docket No. C-2019-3009714 shall be marked closed.

BY THE COMMISSION,



Rosemary Chiavetta  
Secretary

(SEAL)

ORDER ENTERED: December 4, 2019