

**BEFORE THE PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

<b>600 SCRANTON LLC,</b>	:	
<b>Complainant</b>	:	
	:	
<b>v.</b>	:	<b>C-2019-3014952</b>
	:	
<b>PPL ELECTRIC CO.,</b>	:	<b>JUDGE DENNIS J. BUCKLEY</b>
	:	
<b>Respondent</b>	:	

**COMPLAINANT, 600 SCRANTON LLC'S, MOTION TO WITHDRAW MOTION TO  
TO COMPEL RESPONDENT, PPL ELECTRIC UTILITIES CORPORATION TO  
PRODUCE ITS BILLING STATEMENTS OF SUGARMAN'S PLAZA, LTD  
FOR YEARS 2016 AND 2017 DOCKETED JULY 17, 2021**

AND NOW, Pursuant to 52 Pa. Code §§ 5.342 and 5.321(c), 600 Scranton LLC, ("Complainant" or "600 Scranton, LLC") by and through its attorney, Thomas J. Jones, Jr., Esq., hereby respectfully requests that the Pennsylvania Public Utility Commission (the "Commission") Grant the Motion to Withdraw the Complainant's Motion to Compel filed July 17, 2021 and sets forth the following in support thereof:

1. PPL has submitted Objections to the Motion to Produce filed July 17, 2021, propounded upon it by 600 Scranton, LLC; specifically, PPL objected to the provision of the billing invoices for the prior owner Sugarmans Plaza LTD for 2017.

2. At the July 22, 2021, prehearing conference, Respondent's counsel finally agreed to provide the electric rate charged the prior owner. By email message to counsel for Complainant dated July 23, 2021, from Respondent's counsel, she revealed the prior rate charged the prior owner was LP4. This is important information for Complainant's case to establish the much higher cost of electric service provided to 600 Scranton, LLC pursuant to the unauthorized requested electric service under the LP4-RTP Rate charged to Complainant.

3. Respondent's counsel did not reveal where or from whom this important information was obtained.

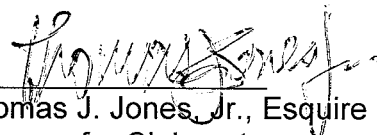
4. Respondent has repeatedly denied providing the requested information over a 2-year period, first demanding Complainant obtain and submit a release signed by the prior owner, Chaim Laufer. Three times over the course of the 2 years, Complainant has submitted the required release with no result. Additionally, Respondent's counsel has stated Respondent does not maintain the billing statements for the period prior to July 2017 and cannot provide the requested information.

5. The reason Complainant wanted the billing invoice was to discover the electric rate charged the prior owner in bankruptcy for the month of June 2017, the month before Complainant assumed possession of the property. This would disclose the transmission and distribution charges as well as KW and kWH usage.

6. Now that Respondent's counsel has finally revealed the rate tariff LP4, for the prior property owner, Complainant moves to withdraw the Motion to Compel filed July 17, 2021, and has filed a more direct and specific Motion to Compel of even date with the within Motion to Withdraw the Motion to Compel filed July 17, 2021.

WHEREFORE it is respectfully moved the Complainant's Motion to Withdraw the Motion to Compel filed July 17, 2021 be granted, and the said Motion be permitted Withdrawn.

Respectfully submitted,

  
\_\_\_\_\_  
Thomas J. Jones, Jr., Esquire  
Attorney for Claimant  
600 Scranton, LLC

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

600 SCRANTON, LLC	:	
Complainant	:	
v.	:	C-2019-3014952
PPL ELECTRIC UTILITIES CORPORATION	:	
Respondent	:	

CERTIFICATE OF SERVICE


I, Thomas J. Jones, Jr., Esquire, hereby certify that I have served the foregoing Complainant's Motion to Withdraw Motion to Compel, upon the individuals electronically at the addresses set forth below.

Honorable Dennis Buckley  
Administrative Law Judge  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[debuckley@pa.gov](mailto:debuckley@pa.gov)

Kimberly G. Krupka, Esq.  
GROSS MCGINLEY LLP  
33 S. Seventh Street,  
Allentown, PA 18105  
[kkrupka@grossmcginley.com](mailto:kkrupka@grossmcginley.com)

August 25, 2021

Thomas J. Jones, Jr., P.C.

  
Thomas J. Jones, Jr., Esquire  
Attorney for Complainant  
600 Scranton, LLC