

**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 COMPEL  
RESPONDENT, PPL ELECTRIC CO. RESPONSE TO COMPLAINANT'S  
MOTION FOR PRODUCTION OF DOCUMENTS**

AND NOW, Pursuant to 52 Pa. Code §§ 5.342 and 5.321(c), comes 600 Scranton LLC, ("Complainant" or "600 Scranton, LLC") by and through its attorney, Thomas J. Jones, Jr., Esq., and hereby respectfully requests that the Pennsylvania Public Utility Commission (the "Commission") compel PPL Electric Co. ("PPL") to fully respond to and file a complete response to Complainant's Motion for Production of Documents.

1. PPL has submitted Objections to the Motion to Produce 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 prehearing conference conducted by ALJ Buckley on July 22, 2021, Respondent's counsel finally agreed to provide the tariff rate charged Sugarmans Plaza Ltd.

3. The reason Complainant was seeking 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.

4. Discovery so far has revealed that an employee of the prior owner, Ben Lorenzetti, while the company was still in bankruptcy court and without authority of Complainant, requested electric service to be provided Complainant at the highest rate possible to be charged, to wit LP4-RTP.

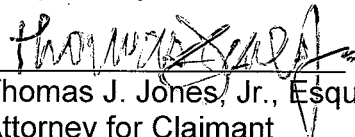
5. Respondent has repeatedly denied providing the requested information over a 2-year period, first demanding Complainant obtain and submit a release signed by the prior owner, Chaim Laufer. Three (3) times over the course of the 2 years, Complainant has submitted the required release with no result. 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.

6. At the July 22, 2021, prehearing conference, respondent's counsel finally agreed to provide the electric rate charged the prior owner. By email message from respondent's counsel, she finally 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.

7. The prior owner was in full operation for business and all tenants consuming the same amount of electricity service up to and including July 7, 2017. In order to make a full and complete comparison of the difference of the 2 rates and the overcharge by PPL, it is essential to examine the prior owner's electric bill of June 2017 which has not been provided and that would show the transmission and distribution charges as well as KW and kWH usage.

WHEREFORE it is respectfully moved that the Respondent, PPL Electric Utilities, be ordered to produce the billing invoice of the prior owner, Sugarman's Plaza Ltd., for the month of June 2017.

Respectfully submitted,

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

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600 SCRANTON, LLC

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CERTIFICATE OF SERVICE

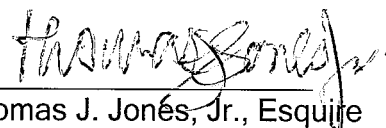
I, Thomas J. Jones, Jr., Esquire, hereby certify that I have served the foregoing Complainant's Motion to Compel Respondent's Response to Complainant's Motion for Production of Documents, upon the individuals electronically at the addresses set forth below.

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

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August 25, 2021

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



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