

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LAWRENCE KINGSLEY,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2020-3019763

**Respondent's Answer to Complainant's Motion to Compel Interrogatory
Response and Request it be Accepted Nunc Pro Tunc**

TO: ROSEMARY CHIAVETTA:

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

1. Admitted that Complainant so moves. Admitted that Complainant is entitled to responses relative to his account, and as are permitted by the laws and rules relating to the privacy of third parties. By way of further response, the documents which are responsive and would provide the Answers to Complainant's Interrogatories have been previously provided. Nonetheless, PPL Electric requests 10 days to provide written responses to Complainant's Interrogatories and agrees to immediately provide, via e-mail, a copy of PPL Electric's Security Deposits and Credit Policy which was requested within the Interrogatories and represent the only documents not yet provided.

2. Admitted in part, denied in part. Admitted that said interrogatories related to billings, but not solely to the billings of Complainant. By way of further response, Respondent has provided to Complainant copies of all billings/payments and Contact History on the accounts of Complainant and the Estate of Linda Schoener.

3. Admitted.

4. Admitted in part, denied in part. While PPL Electric has not provided responses to the said interrogatories, PPL Electric has previously provided all responsive documents.

5. The Interrogatories are writings which speak for themselves. All other inferences are denied. By of further response, PPL Electric has previously provided these Exhibits which include the Account Activity Statements, History of Customer Contacts and BCS Informal Case Views for the accounts of Complainant and Estate of Linda Schoener.

6. Admitted in part, denied in part. Admitted that Complainant is entitled to his own billings records to the extent the same are retained by PPL Electric. Denied Complainant is entitled to billings records of third parties. Moreover, PPL Electric agrees to provide a written copy of the policy on Security Deposits and Credit Policy, which is publicly available at [https://www.pplelectric.com/my-account/start-stop-move-service/credit-](https://www.pplelectric.com/my-account/start-stop-move-service/credit-policy#:~:text=Credit%20Policy%20for%20Existing%20Customers,in%20the%20previous%2012%20months)

policy#:~:text=Credit%20Policy%20for%20Existing%20Customers,in%20the%20previous%2012%20months

7. The allegation of this paragraph is a conclusion of law to which no response is required.

8. The allegation of this paragraph is a conclusion of law to which no response is required.

9. Denied. PPL Electric agrees that Complainant is entitled to all his own billings records and the same have been supplied. Denied that Respondent is entitled to any third party records.

10. Denied. PPL Electric agrees that Complainant is entitled to all his own billings records and the same have been supplied. Denied that Respondent is entitled to any third party records.

11. Admitted that Complainant is entitled to all his billings records and the same will be provided. All other allegations and inferences are denied.

12. Admitted that Complainant is entitled to all his billings records and the same will be provided. All other allegations and inferences are denied.

13. Admitted that Complainant has attached an Affidavit which is a writing which speaks for itself. All other allegations are denied.

WHEREFORE, in light of the foregoing, PPL Electric Utilities Corporation respectfully requests that the Commission deny the Motion to Compel Interrogatories.

GROSS MCGINLEY, LLP



BY: _____

KIMBERLY G. KRUPKA, ESQUIRE

ID No: 83071

Attorney for Respondent

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Date: January 13, 2022

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CERTIFICATE OF SERVICE

This is to certify that the foregoing ANSWER on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record on behalf of Respondent by first class United States mail, postage on this the 13th day of January, 2022.

LAWRENCE KINGSLEY
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GROSS MCGINLEY, LLP



BY: _____

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Date: January 13, 2022