

Kimberly G. Krupka

33 S. Seventh Street, P.O. Box 4060
Allentown, PA 18105
Direct Dial Number 610/871-1325
kkrupka@grossmcginley.com

ATTORNEYS

PAUL A. MCGINLEY
HOWARD S. STEVENS
J. JACKSON EATON, III
ANNE K. MANLEY
VICTOR F. CAVACINI
THOMAS E. REILLY, JR.
STUART T. SHMOOKLER
JOHN F. GROSS
LOREN L. SPEZIALE*†
ALLEN I. TULLAR
KIMBERLY G. KRUPKA
SAMUEL E. COHEN‡
ADRIAN K. COUSENS‡
R. NICHOLAS NANOVIC*~
SARAH HART CHARETTE*
KELLIE L. RAHL-HEFFNER
PHILIP D. LAUER
JASON A. ULRICH
JENNIFER L. WEED †•
MICHAEL J. BLUM* •
JAMES M. LAVELLE‡
JESSICA L. HARLOW
CONSTANCE K. NELSON
NICHOLAS SANDERCOCK
ROBERT M. CAMPBELL
SAFA ASHRAFI*
JACOB D. OLDAKER
BENJAMIN J. LEWIS
YEKATERINA BACENET*
RACHAEL E. SHAW
MICHAEL S. HORVATH, II
SARA A. MOYER

MALCOLM J. GROSS, Ret.
DONALD LaBARRE, Jr., Ret.
CHARLES J. FONZONE, Ret.
MICHAEL A. HENRY, Ret.

Of Counsel:
PATRICK J. REILLY ~
MARIANNE S. LAVELLE

‡Also admitted in CO
†Also admitted in DC
~Also admitted in FL
•Also admitted in MA
^Also admitted in MD
*Also admitted in NJ
•Also admitted in NM
*Also admitted in NY
^Also admitted in TX

Allentown Office:
33 S. Seventh Street
P.O. Box 4060
Allentown, PA 18105
Phone: 610/820-5450
Fax: 610/820-6006

Easton Office:
101 Larry Holmes Drive, Suite 202
Easton, PA 18042
Phone: 610/258-1506
Fax: 610/258-0701

Lehighon Office
415 Mahoning Street
Lehighon, PA 18235
Phone: 610/377-0500

May 26, 2022

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 for Pre-Hearing Conference.

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*
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 FOR PRE-HEARING CONFERENCE**

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 for Pre-Hearing Conference, and in support thereof avers as follows:

1. Admitted that Complainant filed a Complaint on or about December 13, 2019.
2. Admitted that Respondent filed an Answer on or about January 2, 2020.
3. Admitted that a Notice of Hearing was issued on January 9, 2020 for a hearing to be held on February 20, 2020.
4. Admitted that on or about May 9, 2022, an Order was issued for a Hearing to be held on June 23, 2022. The Order is a writing which speaks for itself and all other inferences denied.
5. Admitted that Complainant seeks a Pre-hearing conference.

a. Denied that all discovery has not be provided. As alleged by Complainant, PPL Electric has confirmed the rate schedule of the prior owner and all available information, the latest of which was provided on February 11, 2022.

b. Denied. By way of further response, Respondent has offered to produce Brian Stafford for deposition.

c. The allegations of this paragraph pertain to an allegation against someone other than Respondent, and therefore, no response is required. Nonetheless, Respondent avers that Judge Buckley has not shown any degree of unfairness in the proceedings, and should remain assigned to this matter.

5 (sic). Denied. Upon receipt of this Motion, counsel has checked all voicemail messages and received none from counsel for Complainant. Moreover, on the date after Complainant filed this Motion, counsel for Respondent e-mailed counsel for Complainant indicating no voicemails and inviting a call, which was never thereafter placed. (A true a correct copy of the e-mail is attached hereto as Exhibit 1).

WHEREFORE, as Respondent does not object to a conference call, Respondent files this response to correct some allegations contained in Complainant's Motion.

GROSS MCGINLEY, LLP



BY: _____

KIMBERLY G. KRUPKA, ESQUIRE
ID No: 83071
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: May 26, 2022

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

600 SCRANTON, LLC,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2019-3014952


CERTIFICATE OF SERVICE

This is to certify that the Answer of Respondent, PPL Electric Utilities Corporation, to Complainant's Motion for Pre-Hearing Conference was provided to the following on behalf of Respondent by email and/or first class United States mail, postage on this the 26th day of May, 2022.

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

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

GROSS MCGINLEY, LLP

BY: 

KIMBERLY G. KRUPKA, ESQUIRE

ID No: 83071

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

EXHIBIT “1”

Kimberly Krupka

From: Kimberly Krupka
Sent: Wednesday, May 18, 2022 11:32 AM
To: 'Thomas Jones'
Subject: RE: 600 Scranton, LLC v. PPL Electric

Attorney Jones,

I have checked my voicemail but do not see any calls from you. I apologize if I have missed a voicemail but my call log is not showing one. Can you let me know a good number to call you at.

Kimberly G. Krupka

Attorney at Law

GROSS MCGINLEY, LLP
DIRECT (610) 871-1325

From: Thomas Jones <tjoneslaw@gmail.com>
Sent: Tuesday, May 17, 2022 4:53 PM
To: Kimberly Krupka <KKrupka@grossmcginley.com>
Subject: 600 Scranton, LLC v. PPL Electric

CAUTION: External Email

Motion for Pre-Hearing Conference attached.
Thank you.