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July 15, 202

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

RE: Lawrence Kingsley v. PPL Electric Utilities Corporation
Docket No: C-2020-3019763

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter is the Answer of PPL Electric Utilities Corporation to Complainant's Motion to Amend Exceptions.

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*
Lawrence Kingsley (w/enc.) *via email and First Class Mail*
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

LAWRENCE KINGSLEY,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2020-3019763

**ANSWER OF RESPONDENT, PPL ELECTRIC UTILITIES CORPORATION, TO
COMPLAINANT'S MOTION TO AMEND EXCEPTIONS**

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 Amend Exceptions, and in support thereof, avers as follows:

1. Admitted that Complainant so moves. Denied that Complainant has set forth a sufficient basis for Complainant's request. As such, Respondent request that the instant Motion be denied.

2. Admitted in part, denied in part. Admitted that Complainant's Exceptions were timely filed. Denied that Complainant was "rushed" to submit this filing. By way of further response, Complainant was given the same amount of time as any party wishing to file Exceptions under the applicable rules. The fact that Complainant had unidentified "other work" is not a unique or compelling circumstance that should entitle Complainant to additional time.

3. Respondent is without sufficient to form a belief as to what Complainant has determined in this matter. By way of further response, Complainant was given the same amount of time as any party wishing to file Exceptions under the applicable rules. The fact that Complainant


has unidentified “other work” is not a unique or compelling circumstance that should entitle Complainant to additional time.

4. Denied. Respondent denies that the Complainant’s proposed Amended Exceptions will facilitate a significantly different analysis and understanding of Complainant’s position. By way of further response, Respondent contends that preparing and providing enhanced responses to the Amended Exceptions will expend unnecessary amounts of Respondent’s time and money, and needlessly delay the final disposition of this matter.

5. Denied. Respondent denies that it will not be prejudiced if Complainant is permitted to file Amended Exceptions. By way of further response, Respondent contends that preparing and providing enhanced responses to the Amended Exceptions will expend unnecessary amounts of Respondent’s time and money, and needlessly delay the final disposition of this matter.

WHEREFORE, in light of the foregoing, PPL Electric Utilities Corporation respectfully requests that Complainant’s Motion to Amend Exceptions.

GROSS MCGINLEY, LLP

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Date: July 15, 2022

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LAWRENCE KINGSLEY,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. C-2020-3019763

CERTIFICATE OF SERVICE

This is to certify that the *Answer of Respondent, PPL Electric Utilities Corporation, to Complainant's Motion to Amend Exceptions* was mailed to counsel/complainant of record on behalf of Respondent by electronic mail and first class United States mail, postage on this the 15th day of July, 2022.

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GROSS MCGINLEY, LLP



BY: _____

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