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December 12, 2022

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Jay Larry Moyer v. PPL Electric Utilities Corporation
Docket No. C-2022-3036908

Dear Secretary Chiavetta:

Attached for filing are the Preliminary Objections of PPL Electric Utilities Corporation to the Complaint of Jay Larry Moyer in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully,



Devin T. Ryan

DR/dmc
Attachments

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & REGULAR MAIL

Jay Larry Moyer
225 West Pastorius Street
Apartment 12
Philadelphia, PA 19144
E-mail:gtown73@hotmail.com

Date: December 12, 2022



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Jay Larry Moyer,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2022-3036908
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.101, YOU MAY FILE AN ANSWER TO THE ENCLOSED PRELIMINARY OBJECTIONS WITHIN TEN (10) DAYS OF THE DATE OF SERVICE HEREOF. YOUR ANSWER TO THE PRELIMINARY OBJECTIONS MUST BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL FOR PPL ELECTRIC UTILITIES CORPORATION.

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Date: December 12, 2022

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Jay Larry Moyer,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2022-3036908
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**PRELIMINARY OBJECTIONS OF
PPL ELECTRIC UTILITIES CORPORATION TO THE
SIXTH COMPLAINT OF JAY LARRY MOYER**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) and hereby files these Preliminary Objections, pursuant to the regulations of the Pennsylvania Public Utility Commission (“Commission”) at 52 Pa. Code § 5.101, and respectfully requests that the Commission dismiss the above-captioned Formal Complaint (“*Sixth Complaint*”) filed by Jay Larry Moyer (“Complainant”) in its entirety and with prejudice as against PPL Electric because it is legally insufficient and an abuse of administrative process. Further, the Sixth Complaint should be dismissed due to the pending of prior proceedings.

This is the *Sixth* *Complaint* that the Complainant has filed with the Commission against PPL Electric concerning the Company’s virtual meter aggregation program and billing

practices.¹ All of those Complaints were dismissed by the Commission and, for those decisions appealed by the Complainant, by Pennsylvania appellate courts.

Here, the *Sixth Complaint* is legally insufficient and an abuse of administrative process. The Complainant once again raises issues concerning the Company's virtual meter aggregation of his residential and solar accounts and PPL Electric's billing processes. Consistent with the Commission's *Fifth Complaint Order* entered December 8, 2022, which granted PPL Electric's Preliminary Objection and dismissed the Complainant's Fifth Complaint with prejudice because the Complaint was legally insufficient and an abuse of administrative process, the Commission should dismiss the *Sixth Complaint* on the same grounds.

Further, the appeal period for the *Fifth Complaint Order* has not expired as of the date of these Preliminary Objections. Moreover, the Complainant avers that his *Sixth Complaint* raises "concerns" that "parallel those presented in a petition filed by the Philadelphia Energy Authority on March 25, 2021" at Docket No. P-2021-3024841. (*Sixth Complaint*, Item #4, p. 1.) The Philadelphia Energy Authority's ("PEA") Petition remains pending as of the date of these Preliminary Objections. Therefore, the *Sixth Complaint* should be dismissed due to the pendency of prior proceedings.

¹ The First and Second Complaints were filed at Docket Nos. C-2011-2273645 and C-2014-2444864. Both the Commission and the Commonwealth Court denied the Complainant's claims made in the First and Second Complaints about PPL Electric's virtual meter aggregation program and billing processes, and the Pennsylvania Supreme Court denied the Complainant's Petition for Allowance of Appeal. See *Moyer v. PPL Elec. Utils. Corp.*, Docket Nos. C-2011-2273645, C-2014-2444864 (Order entered May 19, 2016), *affirmed*, *Moyer v. Pa. PUC*, 2017 Pa. Commw. Unpub. LEXIS 167 (Pa. Cmwlth. 2017), *allocatur denied*, *Moyer v. Pa. PUC*, 2017 Pa. LEXIS 2145 (Pa. 2017). Like the First and Second Complaints, the Commission dismissed the Complainant's Third Complaint, which raised issues concerning PPL Electric's virtual meter aggregation billing practices. See *Moyer v. PPL Elec. Utils. Corp.*, Docket No. C-2015-2511904 (Order entered Aug. 8, 2019). As with the First, Second, and Third Complaints, the Commission dismissed the Complainant's Fourth Complaint regarding the Company's virtual meter aggregation billing practices. See *Moyer v. PPL Elec. Utils. Corp.*, Docket No. C-2017-2629683 (Order entered Oct. 28, 2021). The Complainant did not appeal the Commission's October 28, 2021 Order dismissing his Fourth Complaint. Recently, the Commission entered its Opinion and Order in the Complainant's Fifth Complaint proceeding. See *Moyer v. PPL Elec. Utils. Corp.*, Docket No. C-2022-3031294 (Order entered Dec. 8, 2022) ("*Fifth Complaint Order*"). The Commission held that the Fifth Complaint was barred by *res judicata* and constituted an abuse of administrative process, as the Complainant attempted to re-litigate the same issues adjudicated in the prior proceedings. See *id.*, pp. 13-14.

In support thereof, PPL Electric states as follows:

I. BACKGROUND

1. PPL Electric is a “public utility” and an “electric distribution company” as those terms are defined under the Public Utility Code, 66 Pa. C.S. §§ 102 and 2803, subject to the regulatory jurisdiction of the Commission.

2. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

3. On November 22, 2022, PPL Electric was served with the above-captioned Formal Complaint (“*Sixth Complaint*”), which challenges the Company’s virtual meter aggregation program and billing practices and the Complainant’s bills that were produced pursuant thereto. (*Sixth Complaint* ¶ 4; *Sixth Complaint*, Item #4.)

4. Previously, on November 15, 2011, the Complainant filed a Formal Complaint against the Company (“*First Complaint*”) at Docket No. C-2011-2273645 regarding the Company’s virtual meter aggregation billing for electric service to his home in Philadelphia, Pennsylvania, and his solar panels connected to the Company’s distribution system at a location in Klingerstown, Pennsylvania.

5. On November 5, 2014, the Complainant filed another Formal Complaint against PPL Electric, raising concerns over the accuracy and content of PPL Electric’s virtual meter aggregation billing processes for the Complainant’s accounts (“*Second Complaint*”) at Docket No. 2014-2444864.

6. The *First Complaint* and *Second Complaint* were consolidated on January 14, 2015.

7. Both the Commission and the Commonwealth Court denied the Complainant's claims made in the *First* and *Second Complaints* about PPL Electric's virtual meter aggregation program and billing processes, and the Pennsylvania Supreme Court denied the Complainant's Petition for Allowance of Appeal. *See Moyer v. PPL Elec. Utils. Corp.*, Docket Nos. C-2011-2273645, C-2014-2444864 (Order entered May 19, 2016), *affirmed, Moyer I*, 2017 Pa. Commw. Unpub. LEXIS 167 (Pa. Cmwlth. 2017), *allocatur denied, Moyer v. Pa. PUC*, 2017 Pa. LEXIS 2145 (Pa. 2017).

8. On October 29, 2015, the Complainant filed a Third Complaint against PPL Electric, disputing the Company's virtual meter aggregation program and billing practices at Docket No. C-2015-2511904 ("*Third Complaint*").

9. The Commission dismissed the *Third Complaint* on the merits. *See Moyer v. PPL Elec. Utils. Corp.*, Docket No. C-2015-2511904 (Order entered Aug. 8, 2019).

10. On September 29, 2017, the Complainant filed a Fourth Complaint against PPL Electric Docket No. C-2017-2629683 alleging, among other things, that the Company's virtual meter aggregation program and billing practices failed to properly credit his accounts and that the Company should provide him with certain information on a monthly basis at ("*Fourth Complaint*").

11. The Commission dismissed the *Fourth Complaint* on the merits. *See Moyer v. PPL Elec. Utils. Corp.*, Docket No. C-2017-2629683 (Order entered Oct. 28, 2021).

12. Also, the Complainant filed a civil complaint against PPL Electric in the Schuylkill County Court of Common Pleas in January 2019.

13. The civil action raised the same or related issues concerning PPL Electric’s virtual meter aggregation program and billing practices that were adjudicated by the Commission and Pennsylvania appellate courts.

14. On March 8, 2019, PPL Electric timely filed a Motion to Dismiss the civil complaint pursuant to Rule 233.1 of the Pennsylvania Rules of Civil Procedure, given that the complaint raised the same or related issues that were previously adjudicated by the Commission and Pennsylvania appellate courts.

15. On April 3, 2019, the trial court granted PPL Electric’s Motion and, consequently, “barred” the Complainant “from pursuing additional *pro se* litigation against Defendant PPL Electric Utilities Corporation or any related defendant, raising claims that are the same or related to the claims raised in this action, without leave of court.”

16. On appeal, the Commonwealth Court affirmed the trial court’s April 3, 2019 Order.²

17. On March 8, 2022, PPL Electric was served with a Formal Complaint (“*Fifth Complaint*”) at Docket No. C-2022-3031294, in which the Complainant, once again, challenged the Company’s virtual meter aggregation program and billing practices and the Complainant’s bills that were produced pursuant thereto. (*Fifth Complaint* ¶ 4; *Fifth Complaint*, Item #4.)

18. On December 8, 2022, the Commission entered an Opinion and Order dismissing the *Fifth Complaint* with prejudice because it was barred by *res judicata* and constituted an abuse of administrative process, by attempting to re-litigate the same issues previously decided against the Complainant. See *Moyer v. PPL Elec. Utils. Corp.*, Docket No. C-2022-3031294 (Order entered Dec. 8, 2022).

² See *Moyer v. PPL Elec. Utils. Corp.*, 2020 Pa. Commw. Unpub. LEXIS 514 (Pa. Cmwlth. 2020) (“*Moyer II*”).

19. PPL Electric herein files these Preliminary Objections to the *Sixth Complaint*. For the reasons explained below, PPL Electric respectfully requests that the Commission summarily dismiss the *Sixth Complaint* as legally insufficient because it is barred by *res judicata* and is an abuse of administrative process. Further, the Company requests that the Commission dismiss the *Sixth Complaint* due to the pendency of prior proceedings, namely the *Fifth Complaint* proceeding and the PEA Petition proceeding.

II. STANDARD OF REVIEW

20. Pursuant to the Commission's regulations, preliminary objections in response to a pleading may be filed on several grounds, including:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

52 Pa. Code § 5.101(a) (emphasis added).

21. In ruling on preliminary objections, the Presiding Officer must accept as true all well-pled allegations of material facts as well as all inferences reasonably deducible therefrom. *Stilp v. Cmwlth.*, 910 A.2d 775, 781 (Pa. Cmwlth. 2006) (citing *Dep't of Gen. Servs. v. Bd. of Claims*, 881 A.2d 14 (Pa. Cmwlth. 2005)). However, the Presiding Officer need not accept as true conclusions of law, unwarranted inferences from facts, argumentative allegations, or

expressions of opinion. *Stanton-Negley Drug Co. v. Dep't of Pub. Welfare*, 927 A.2d 671, 673 (Pa. Cmwlth. 2007). Notwithstanding, any doubt must be resolved in favor of the non-moving party. *Stilp*, at 781.

22. In addition, the Presiding Officer must determine whether, based on the factual pleadings, if recovery is possible. *See Rok v. Flaherty*, 527 A.2d 211, 214 (Pa. Cmwlth. 1987). Indeed, for preliminary objections to be sustained, it must appear with certainty that the law will permit no recovery. *See Stilp*, at 781; *Milliner v. Enck*, 709 A.2d 417, 418 (Pa. Super. 1998).

III. PRELIMINARY OBJECTIONS

A. **PRELIMINARY OBJECTION NO. 1 – THE SIXTH COMPLAINT IS LEGALLY INSUFFICIENT AND SHOULD BE DISMISSED WITH PREJUDICE BECAUSE IT IS BARRED BY *RES JUDICATA* AND CONSTITUTES AN ABUSE OF ADMINISTRATIVE PROCESS**

23. PPL Electric incorporates by reference Paragraphs 1 through 22 as if fully set forth herein.

24. The *Sixth Complaint* should be dismissed as legally insufficient because it is barred by *res judicata* and constitutes an abuse of administrative process.³

25. *Res judicata* “prohibits parties involved in a prior litigation from subsequently asserting claims in a later action that were raised, or could have been raised, in the previous adjudication.” *Hillgartner v. Port Auth.*, 936 A.2d 131, 141(Pa. Cmwlth. 2007) (quoting *Montella v. Berkheimer Assocs.*, 690 A.2d 802 (Pa. Cmwlth. 1997)).

³ To the extent that the presiding officer and Commission believe that *res judicata* claims should be addressed in motions for judgment on the pleadings, PPL Electric respectfully requests that the presiding officer and Commission treat these Preliminary Objections as such, given the frivolous nature of the Sixth Complaint, the Complainant’s repeated filing of the same Complaints, and the Commission’s dismissal based on *res judicata* grounds at the preliminary objections stage in the *Fifth Complaint* proceeding. *See Fifth Complaint Order*, pp. 13-14.

26. *Res judicata* also “shields parties from the burden of re-litigating claims with the same parties, or parties in privity with the original litigant, and serves to protect the courts from inefficiency and confusion that re-litigation fosters.” *Id.* (emphasis added) (citation omitted).

27. For the doctrine of *res judicata* to apply, a party must demonstrate: (1) identity of issues, (2) identity of causes of action, (3) identity of persons and parties to the action, and (4) identity of the quality or capacity of the parties suing or being sued. *Day v. Volkswagenwerk Aktiengesellschaft*, 464 A.2d 1313, 1316-17 (Pa. Super. 1983).

28. The instant Complaint is barred by *res judicata* because in the *First, Second, Third, Fourth, and Fifth Complaints* and the instant Complaint: (1) the issues are about PPL Electric’s virtual meter aggregation program and billing practices as well as the same electric accounts of the Complainant; (2) the cause of action is a formal complaint involving PPL Electric’s virtual meter aggregation billing practices; (3) the parties in the prior action and the instant proceeding are the same (*i.e.*, Jay Larry Moyer and PPL Electric); and (4) the complainant and respondent in the *First, Second, Third, Fourth, and Fifth Complaints* and instant Complaint are the same and, therefore, have identical quality or capacity.

29. In addition, the *Sixth Complaint* constitutes an abuse of administrative process, due to the Complainant’s repeated filing of Complaints about the same issues.

30. As noted previously, the Complainant previously filed five Formal Complaints against PPL Electric concerning the Company’s virtual meter aggregation program and billing practices.

31. All of those Complaints were dismissed by the Commission and, for those decisions that the Complainant appealed, by Pennsylvania appellate courts.

32. As such, PPL Electric's virtual meter aggregation program and billing practices were extensively litigated with the Complainant before the Commission and appellate courts. *See* note 1, *supra*.

33. In all of those proceedings, the Complainant's allegations were rejected, and his Complaints were dismissed.

34. Most recently, the Commission entered its *Fifth Complaint Order* on December 8, 2022, in which the Commission granted PPL Electric's Preliminary Objection and dismissed the *Fifth Complaint* with prejudice because it was legally insufficient. *See Fifth Complaint Order*, pp. 13-14.

35. The Commission held that the *Fifth Complaint* was barred by *res judicata* and, due to the Complainant's repeated attempts to re-litigate the issues decided against him, an abuse of administrative process. *See id.*

36. Specifically, the Commission held the following:

Based upon our review, we conclude that the ALJ's thorough review of the prior four proceedings established conclusively that the facts and issues raised in the prior four proceedings were identical to the present Complaint. We agree with the ALJ's conclusion that the elements necessary for the application of *res judicata* are satisfied in the present case. As previously noted, the doctrine of *res judicata* will preclude an action where the former and latter suits possess the following common elements: (1) identity of issues; (2) identity in the cause of action; (3) identity of persons and parties to the action; and (4) identity of the capacity of the parties suing or being sued. *Daley v. A.W. Chesterton, Inc.*, 37 A.3d 1175 (Pa. 2012) (quoting *In the Matter of Iulo*, 766 A.2d 335, 337 (Pa. 2001)).

Here the record of the present and prior four proceedings satisfy all four elements for application of *res judicata*: (1) identity of issues, *i.e.*, the terms of Complainant's net metering with PPL; (2) identity in the cause of action, *i.e.*, Complainant seeks more favorable terms under PPL's net metering program; (3) and (4) identities of parties and capacity of the parties, *i.e.*, Complainant and PPL as participants in net metering.

Therefore, we find that the ALJ properly applied *res judicata* in the circumstances to bar the present Complaint.

We further find that the ALJ properly found that the present Complaint, in view of the prior four identical proceedings before the Commission, constitutes the fifth identical complaint brought by the Complainant, all of which have been reviewed, denied and dismissed. On that basis, the ALJ properly concluded the present Complaint constitutes an abuse of process, and should be dismissed with prejudice.

As the ALJ properly noted, the Commission has previously found that the abuse of process is the basis for dismissal of a matter with prejudice. *See* I.D. at 18, citing, *Grossman v. Bell Tel. Co. of Pa.*, 67 Pa. PUC 714, 717 (1988). The Commission has recognized that the public interest is prejudiced by the wasteful use of the agency's and the respondent's time and resources in addressing a complaint. *See Jefferson v. UGI Utilities, Inc.*, Docket No. Z-00269892 (Order entered December 26, 1995), *see also, e.g., Charles Nichols III v. Bell-Atlantic-Pennsylvania*, Docket No. C-00956667 (Order entered August 4, 1995).

The facts of the present case reflect an egregious example of the Complainant's use of the administrative process to repeatedly raise the same issues which have been previously decided against him. This proceeding demonstrates that both the agency and the utility, PPL, have expended substantial resources to address claims which have been previously reviewed and decided. Accordingly, in these extreme circumstances, in view of the substantial wasteful use of the Commission's and the respondent's time, energy and resources, we conclude that dismissal with prejudice is appropriate.

Fifth Complaint Order, pp. 13-14 (emphasis added).

37. Here, the Complainant once again raises issues concerning the Company's virtual meter aggregation of his residential and solar accounts and PPL Electric's billing processes. (*See Sixth Complaint* ¶¶ 4-5; *Sixth Complaint*, Item #4; *Sixth Complaint*, Item #5.)

38. Therefore, consistent with the Commission's recent determination in the *Fifth Complaint Order*, the Complainant's *Sixth Complaint* constitutes an abuse of administrative process and should be dismissed with prejudice.

39. Thus, the Complainant's *Sixth Complaint* is legally insufficient and should be summarily dismissed with prejudice pursuant to 52 Pa. Code § 5.101(a)(4).

B. PRELIMINARY OBJECTION NO. 2 – THE *SIXTH COMPLAINT* SHOULD BE DISMISSED DUE TO THE PENDENCY OF PRIOR PROCEEDINGS

40. PPL Electric incorporates by reference Paragraphs 1 through 39 as if fully set forth herein.

41. The Commission should dismiss the *Sixth Complaint* because it raises issues that are already the subject of pending proceedings.

42. As noted previously, the Commission recently entered its *Fifth Complaint Order*, granting the Company's Preliminary Objection and dismissing the Complainant's *Fifth Complaint* with prejudice because it was legally insufficient and an abuse of administrative process. *See Fifth Complaint Order*, pp. 13-14.

43. The appeal period for the *Fifth Complaint Order* has not expired yet, as of the date of these Preliminary Objections.

44. Thus, the issues raised in the *Fifth Complaint*, which the Complainant re-raises in the *Sixth Complaint*, remain pending in another proceeding.

45. In addition, on March 25, 2021, PEA filed a Petition to Amend Section 75.13(d) and (e) of the Commission's regulations, concerning the compensation for excess generation produced by customer-generators. *See Petition of the Phila. Energy Auth. to Amend Section 75.13(d) and (e) of the Commission's Rules*, Docket No. P-2021-3024841 (Petition filed Mar. 25, 2021).

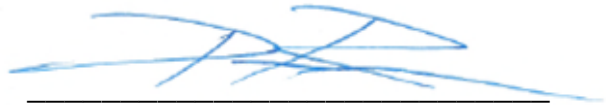
46. According to the Complainant, the "concerns" raised in his *Sixth Complaint* "parallel those presented" in the PEA Petition. (*Sixth Complaint*, Item #4, p. 1.)

47. Therefore, the *Sixth Complaint* should be dismissed due to the pendency of prior proceedings pursuant to 52 Pa. Code § 5.101(a)(6).

IV. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the above-captioned **Sixth** Formal Complaint filed by Jay Larry Moyer at Docket No. C-2022-3036908 be dismissed in its entirety pursuant 52 Pa. Code § 5.101(a)(4) and (6).

Respectfully submitted,



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Date: December 12, 2022

Attorneys for PPL Electric Utilities Corporation

VERIFICATION

I, CHERYL T. OEHLER, being a Project Manager at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 12/09/2022

Cheryl Oehler
Cheryl Oehler (Dec 9, 2022 14:45 EST)

Cheryl T. Oehler