

Diane Riccardo  
250 East Water Street  
Coaldale, PA 18218  
[dlriccardo@gmail.com](mailto:dlriccardo@gmail.com)

April 11, 2023

***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: Diane Riccardo v. PPL Electric Utilities Corporation**  
**Docket No. C-2023-3039108**

Dear Secretary Chiavetta:

Attached please find Complainant Diane Riccardo's Response to the Answer of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies are being provided per the Certificate of Service.

Respectfully submitted,



Diane L Riccardo

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has 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 EMAIL AND FIRST-CLASS MAIL**

Megan E. Rulli  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[mrulli@postschell.com](mailto:mrulli@postschell.com)

717-731-1970 Main  
717-612-6012 Direct  
717-731-1985 Direct Fax

Date: April 11, 2023

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Diane Riccardo,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2023-3039108
	:	
PPL Electric Utilities Corporation	:	
	:	
Respondent	:	

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**COMPLAINANT’S RESPONSE TO ANSWER OF  
PPL ELECTRIC UTILITIES CORPORATION TO  
THE COMPLAINT OF DIANE RICCARDO**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

Complainant Diane Riccardo files this Complainant’s Response to Answer to the Complaint of Diane Riccardo (“Complainant”) that PPL Electric Utilities Corporation filed pursuant to Section 5.61 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.61. Complainant responds to each of the separately-numbered paragraphs of Respondent’s Answer as follows:

**COMPLAINANT’S RESPONSE**

1. No Response is necessary to that which was Admitted by the Company.
2. Company’s Name is not in dispute. Respondent agrees the Company’s full name is PPL Electric Utilities Corporation.
3. No Response is necessary to that which was Admitted by the Company.
4. No Response is necessary to that which was Admitted by the Company.

However, Complainant categorically states Respondent’s denial to this paragraph is deceptively

inaccurate as will be shown below and by attached Exhibits (Exhibit 1, Exhibit 2, Exhibit 3, and Exhibit 4.) The dates below and the Exhibits clearly show Complainant initiated the contact with the Company, and not that the Company initiated contact at the outset of the matter. The Company was far from diligent and respectful of Complainants concerns. By way of further Response, Complainant wishes to show the following chronology of events that transpired on the following dates:

- a. February 20, 2023, as indicated on Exhibit 1, Complainant called the Company, waited some time on the line with no one picking up, and after some time waiting, Complainant requested an automated system callback. Complainant received the callback from a representative while on that call, Complainant was disconnected. Complainant called the Company again, waited some time and then requested a callback from a billing department representative. Complainant never received the callback from the billing department. Complainant waited almost one (1) month before calling the Company again, to give the Company a chance to call her back.
- b. March 16, 2023, as indicated on Exhibit 2, Complainant called the Company, waited some time on the line with no one picking up, and after some time waiting, Complainant requested an automated system callback. Complainant received a call back from the automated system and again requested a callback from the billing department. Complainant never received a callback from any person from the Company.
- c. March 20, 2023, as indicated on Exhibit 3, Complainant called the Company, waited some time on the line with no one picking up, and after some time waiting, Complainant requested an automated system callback. Complainant received the automated system callback and requested to speak with a supervisor. Complainant did not receive a call from anyone else from the

Company that day. Complainant filed both an informal and formal complaints with the Pennsylvania Public Utilities Commission (PA PUC).

- d. March 21, 2023, as indicated on Exhibit 4, one month and a day from when Complainant first called the Company, and ONLY after Complainant filed both informal and formal complaints with the PA PUC, Complainant received a call from the billing department stating that the Company started the billing process and issuing bills for the 2<sup>nd</sup> Floor of Complainant's residence at 250 E Water St., Coaldale, PA 18218. The billing department mentioned that Complainant would be able to utilize a payment agreement to pay what the Company was back-billing Complainant for.
- e. March 23, 2023, also as indicated on Exhibit 4, Complainant received a call from the Company informing her that a formal payment agreement could not be setup because Complainant filed a formal complaint with the PA PUC.

By way of further response, Complainant takes no issue with the Company's response indicating the Company had trouble with its meter data management system ("MDMS") as stated in the Company's Answer to Complainant's Formal Complaint to the PA PUC.

5. Based on all of the aforementioned statements, as well as the following paragraphs, Complainant takes issue with the statement that the Company stated Complainant should be denied relief and strongly feels she is entitled to the relief she requested.
6. No Response is necessary to Respondent's Answer to Paragraph 6 of Complainant's Complaint.
7. Admitted in part and denied in part. What is denied is the statements about the Company being responsive. By way of further Response, while the Company had contact with the Complainant about the overall billing issues, it took over a month's time and the filing of both formal and informal Complaints by Complainant before someone from the Company took the Complainants requests seriously enough to

explain to her what had been transpiring. By way of further response, and based on all of the responses herein, prior to the filing of formal and informal complaint, PPL Electric had not been responsive to all contacts and communications from the Complainant, and had not treated the Complainant in any respectful manner.

8. No Response from Complainant is necessary.
9. No Response from Complainant is necessary.
10. No Response from Complainant is necessary.

WHEREFORE, Complainant Diane Riccardo respectfully requests that her Complaint be granted in its entirety and respectfully requests that she be given some discount on what is to be back-billed because of the wanton disregard and extremely poor customer service presented to her by the Company.

Respectfully submitted,

Diane Riccardo

Diane Riccardo

Date: April 11, 2023



All

# Select items



February 20

## EXHIBIT 1

 **Bernadette Maliko**  4:44 PM

 **(207) 309-9096**  3:16 PM  
Maine

 **Voicemail**  2:18 PM

 **(218) 607-0852**  2:17 PM  
Minnesota

 **(445) 207-5574**   1:47 PM  
Philadelphia

 **PPL** **automated callback to Complainant**  12:38 PM

 **PPL (2)** **outgoing call from Complainant**  12:33 PM

 **PPL** **automated callback to Complainant**  12:30 PM

 **PPL** **outgoing call from Complainant**  12:11 PM



EXHIBIT 2

# Phone



PPL (2) 12:17 PM

PPL 12:00 PM

## March 17

Voicemail 11:42 AM

## March 16

PPL automated callback to Complainant 12:45 PM

PPL outgoing call from Complainant 12:39 PM

## March 15

Caresite Pharmacy 4:14 PM

Rite Aid - Luzerne 11:42 AM

## March 14

+1 712-317-1389 3:51 PM   
Iowa

Keypad

Recents

Contacts



EXHIBIT 3

# Phone



+1 614-758-2317 ✓

Ohio



8:43 AM

## March 20



Voicemail



5:00 PM



+1 850-498-7264

Florida



4:48 PM



+1 800-222-5377 ✓



3:44 PM



Jon Riccardo



2:06 PM



PPL (2) automated callback to Complainant



12:17 PM



PPL outgoing call from Complainant



12:00 PM

## March 17



Voicemail



11:42 AM

Keypad

Recents

Contacts



EXHIBIT 4

# Phone



Jon Riccardo



12:53 PM

## March 23



(570) 829-8111

Wilkes-Barre, PA

3:56 PM



CVS Kingston

3:51 PM



PPL (7) incoming call to Complainant

2:35 PM

## March 21



PPL incoming call to Complainant



3:22 PM



(800) 934-6489 (3)

11:43 AM



(855) 728-0515



11:31 AM



+1 614-758-2317 ✓

Ohio



8:43 AM

## March 20

Keypad

Recents

Contacts



## VERIFICATION

I, DIANE RICCARDO being the Complainant in Complainant's Response to Answer to PPL Electric Utilities Corporation to the Complaint of Diane Riccardo do 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 to be able to prove the same at a hearing held in this matter, whether before the PA PUC or before a Court of reasonable jurisdiction. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

APRIL 11, 2023

  
\_\_\_\_\_  
Diane Riccardo