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Friday, February 23, 2024

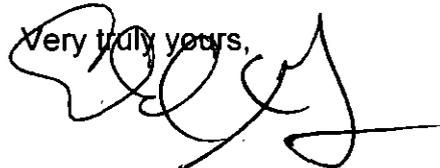
Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**Re: Kulpmont Borough vs PPL Electric Utilities Corporation  
Docket No. C-2024-3045421  
Our File No. 4161-2023-12**

Dear Secretary:

Enclosed please find an original and nine copies of Complainant's Response to Respondent's New Matter, regarding the above captioned matter.

Feel free to contact me with any questions.

Very truly yours,  


Edward C. Greco

ECG:jms

Enclosure

cc: Administrative Law Judges' Office/PUC  
Post & Schell, P.C.  
Office of Special Assistants  
Client

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

BOROUGH OF KULPMONT,  
Complainant

\* COMPLAINT DOCKET  
\*  
\* No. C-2024-3045421  
\*

vs

PPL ELECTRIC UTILITIES CORPORATION,  
Respondent

\*  
\*  
\*  
\*

**COMPLAINANT'S RESPONSE TO RESPONDENT'S NEW MATTER**

Complainant, BOROUGH OF KULPMONT, files this Response to Respondent's New Matter and avers as follows:

1. Denied. No response required.
2. Denied. This paragraph contains conclusion of law to which no response is required.
3. Admitted.
4. Denied. This paragraph contains conclusion of law to which no response is required.
5. Denied. This paragraph contains conclusion of law to which no response is required.
6. Admitted in part, denied in part. It is admitted that the complaint was filed on or about December 13, 2023. By way of further answer, it is denied that it was served on PPL Electric as such information is not ascertainable and therefore must be denied.

7. Admitted.
8. Denied. This paragraph contains conclusion of law to which no response is required.
9. Denied. This paragraph contains conclusion of law to which no response is required.
10. Denied. This paragraph contains conclusion of law to which no response is required.
11. Denied. This paragraph contains conclusion of law to which no response is required.
12. Denied. This paragraph contains conclusion of law to which no response is required.
13. Denied. This paragraph contains conclusion of law to which no response is required.
14. Denied. This paragraph contains conclusion of law to which no response is required.
15. Denied. After reasonable investigation, Plaintiff cannot verify the truth of the averment and therefore denies the same.

16. Denied. This paragraph contains conclusion of law to which no response is required.

WHEREFORE, Complainant asks the relief requested in their complaint.

Respectfully Submitted:



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Edward C. Greco  
Attorney for Complainant  
I. D. # 53011  
660 Chestnut Street  
Kulpmont, PA 17834  
(570) 373-3655

Date:

2/23/24

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

BOROUGH OF KULPMONT,  
Complainant

\* COMPLAINT DOCKET  
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VS

PPL ELECTRIC UTILITIES CORPORATION,  
Respondent

\*  
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**CERTIFICATE OF SERVICE**

I, Edward C. Greco, Esquire, attorney for the Complainant, hereby certify that true and correct copies of Complainant's Response to Respondent's New Matter was served via email and/or First-Class mail (unless otherwise noted below) upon the following persons, in accordance with the requirements of 52 Pa. Codé § 1.54 (relating to service by a participant).

The Honorable Conrad A. Johnson  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Piatt Place  
301 5<sup>th</sup> Avenue - Suite 220  
Pittsburgh, PA 15222  
(Hard copy)

Devin T. Ryan, Esquire, via email to:  
Peter J. Kramer, Esquire  
Nicholas A. Stobbe, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
E-mail: [dryan@postschell.com](mailto:dryan@postschell.com)  
[pkramer@postschell.com](mailto:pkramer@postschell.com)  
[nstobbe@postschell.com](mailto:nstobbe@postschell.com)  
(Hard copy and email)

Kimberly A. Klock, Esquire  
Michael J. Shafer, Esquire  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
E-Mail: [kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mshafer@pplweb.com](mailto:mshafer@pplweb.com)

Commissioner's Office  
Special Assistants  
(OSA) [ra-OSA@pa.gov](mailto:ra-OSA@pa.gov)  
(Email only)

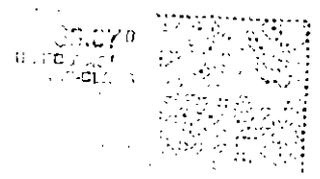
Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
(Overnight mail)

Date:

2/23/24  




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ID #53011  
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Commission  
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