

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Julian Hormilla,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. F-2024-3046014
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**COMPLAINANT’S, JULIAN HORMILLA, FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS TO RESPONDENT,
PPL ELECTRIC UTILITIES CORPORATION**

Pursuant to 52 Pa. Code § 5.341, the Complainant in the above-captioned matter, Julian Hormilla ("Complainant"), hereby propounds the following First Set of Interrogatories and Request for Production of Documents to the Respondent in the above-captioned matter, PPL Electric Utilities Corporation ("Respondent"), to be answered by those officers, employees, agents, or contractors who have knowledge of the requested facts, and who are authorized to answer on behalf of Respondent. Each Interrogatory or Request is to be verified by the responding witness in accordance with 52 Pa. Code § 5.342(a)(6). **The Interrogatories and Requests are to be answered separately and fully in writing, under oath, WITHIN TWENTY (20) DAYS of service hereof, pursuant to 52 Pa. Code § 5.342(d).**

These Interrogatories and Request are continuing, and any information secured or discovered subsequent to the filing of your answers is to be supplied by supplemental answers.

INSTRUCTIONS

In answering each interrogatory or request for documents:

1. Each interrogatory or request for documents shall be restated before the answer is provided.

2. To the extent possible, each interrogatory or request for documents and each answer thereto shall be provided on a separate page from all other interrogatories and answers.
3. Each Interrogatory and part thereof, shall be answered separately, fully and completely, without reference to any answer of any other Interrogatory.
4. Unless otherwise indicated, the relevant time period referred to in these Interrogatories is from **June 1, 2020** through the date of your answer to these Interrogatories.
5. With respect to information or documents as to which you may claim privilege, attorney's work product or trial preparation materials, you are requested to identify each such document, in writing, on or before the date of the production set forth herein, together with the following information: the nature, date, subject matter and author of the document, as well as the identity of all persons to whom the document was directed, addressed or received, and the paragraphs of the discovery requests to which the document corresponds. For each such document, you are further required to state the basis for your claim of privilege, attorney's work product, or trial preparation materials
6. Identify each document and oral communication that forms the basis in whole or in part for each answer or that corroborates the answer or the substance thereof, stating separately each item required by Definitions # 8 and # 9 below.
7. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Label the written material with the number of the interrogatory to which it pertains.
8. If you know of any document, communication or information but cannot give the specific information or the full information called for by a particular interrogatory or request, so state and give the best information you have on the subject and identify every person you believe to have the required information.
9. If the answer to an Interrogatory or request for documents is not presently known to Respondent, so state and, in addition, respond to the interrogatory within ten (10) days after the date on which such answer becomes known to Respondent.
10. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun, and vice versa; the masculine form of a pronoun shall be considered to include also within its meaning the feminine and neuter forms of the pronoun, and vice versa; and the use of any tense of any verb shall be considered to include also within its meaning all other tenses of the verb. In each instance, the interrogatory or request shall be construed so as to require the most inclusive answer or production.
11. The conjunctions "and" and "or" shall be individually interpreted as meaning "and/or" and shall not be construed disjunctively so as to exclude any information otherwise within the scope of any specification in any interrogatory or request for documents.

DEFINITIONS

1. "Respondent" means the Respondent, PPL Electric Utilities Corporation, including but not limited to any divisions, departments, subsidiaries, affiliates, predecessors, present or former officers, directors, owners, supervisors, managers, employees, servants, workmen, representatives, attorneys, or agents of each entity and all other persons acting or purporting to act on behalf of each entity and all other persons acting or purporting to act on behalf of each such entity or person.
2. "You" or "Your" means the Respondent, PPL Electric Utilities Corporation, unless otherwise noted, including but not limited to any divisions, departments, subsidiaries, affiliates, predecessors, present or former officers, directors, owners, supervisors, managers, employees, servants, workmen, representatives, attorneys, or agents of each entity and all other persons acting or purporting to act on behalf of each entity and all other persons acting or purporting to act on behalf of each such entity or person.
3. The term "documents" means all writings of any kind including the originals of all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise (including without limitation), correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, inter-office and intra-office communications, offers, notations of any sort of conversations, telephone calls, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, telefax, invoices, worksheets, and all drafts, alterations, modifications, changes and amendments of any of the foregoing, graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, records, motion pictures) and electronic, mechanical or electric records or representations of any kind (including without limitation, tapes, cassettes, discs, recordings).
4. The term "all documents" means every document as above defined known to you and every such document that can be located or discovered by reasonably diligent efforts.
5. The phrase "within the scope of this application" refers to the authority as sought in the application to the Pennsylvania Public Utility Commission as shown in the Pennsylvania Code and/or Bulletin published in this proceeding.
6. The term "identify" or "identification," when used in reference to an individual person, means to state his full name, his present or last known address, his present or last known position and business affiliation, and his position or affiliation with any party herein at any relevant time.
7. The term "identify," when used in reference to a corporation, partnership, or other business entity, means to state its full name and address, and, in the case of a corporation, the state of incorporation and the address of its principal place of business.

8. The word "identify" when used in reference to a document means to:
 - (i) State the date, author, recipient, and type of document (e.g., invoice, delivery receipt, etc.) or some other means of distinguishing the document);
 - (ii) Set forth or attach to the answer a true copy of the document;
 - (iii) Identify each person who prepared the document;
 - (iv) Identify each person who participated in the preparation of the document;
 - (v) State the present location of the document; and
 - (vi) Identify each person having custody or control of the document.
9. The term "identify" when used in reference to an oral communication, means to:
 - (i) State the date, place or places, and parties to the oral communication or some other means of identifying the oral communication;
 - (ii) Set forth the substance of the oral communication;
 - (iii) State the medium through which the oral communication was made (e.g., in person or by telephone);
 - (iv) Identify each person who participated in the oral communication;
 - (v) Identify each person hearing the oral communication; to identify a document by definition # 8 above.
10. "Person" or "persons" means all individuals and entities, including, without limitation, individuals, representative persons, associations, companies, corporations, partnerships, limited partnerships, joint ventures, trusts, estates, public agencies, departments, divisions, bureaus and boards.
11. "Complaint" means the complaint filed by Julian Hormilla against PPL Electric Utilities Corporation in the above-captioned matter.

**FIRST SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS**

1. Identify the person or persons participating in the answering of these interrogatories. For each person list the person's official position or relationship with the Respondent, as well as the number of each interrogatory which the person participated in answering.
2. Identify any person or persons who are believed or known by Respondent to have any knowledge concerning any of the issues in this Complaint; and specify the subject matter about which these witnesses have knowledge.
3. Have you heard or do you know about any statement or remark made by or on behalf of any person or persons, other than Respondent, concerning any issue in this Complaint? If so, identify each person who made the statement or statements and each person who heard it; and state the date, time, place and substance of each statement.
4. Identify any and all documents in Respondent's possession that are related to the subject matter of this Complaint.
5. Identify each document and oral communication that Respondent has received by and from Complainant.
6. Identify each document and oral communication that Respondent has sent to Complainant.
7. Identify every person or persons known to you or your representatives who has knowledge about, or possession, custody or control of, any documents pertaining to any fact or issue in this Complaint; and describe as to each, what such person has, the name and address of the person who took or prepared it, and the date it was taken or prepared.
8. Identify each witness Respondent expects to call at the hearing on this Complaint and a summary of the subject matter of their expected testimony.

9. Provide copies of all exhibits to be presented by Respondent at the hearing on this Complaint.

10. Produce all documents that were:

- (a) referenced by you in responding to any interrogatory;
- (b) relied upon by you in responding to any interrogatory;
- (c) identified in any interrogatory response;
- (d) relevant to any interrogatory response;
- (e) relevant to this proceeding; or
- (f) that you contend support your responses to the interrogatories propounded herein.

11. State whether Respondent has been the subject of any complaint to the Pennsylvania Public Utility Commission, or to any other state or federal regulatory or governmental agency, which is similar in substance to this Complaint (i.e. related to allegations that Respondent failed to cancel any services or agreements after a request was made). If so, please describe:

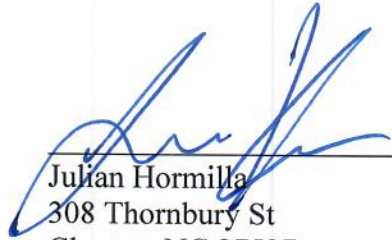
- (a) when the complaint occurred;
- (b) the identity of the complainant;
- (c) the nature of the complaint;
- (d) the final disposition of the complaint; and
- (e) produce copies of the complaint and any final order or settlement resolving the complaint.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a true and correct copy of the foregoing First Set of Interrogatories and Request for Production of Documents on this date of July 1, 2024 upon the person listed below via efile/EMAIL:

Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)
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Allentown, PA 18101
E-mail: kklock@pplweb.com
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