

---

Megan E. Rulli

mrulli@postschell.com  
717-612-6012 Direct  
717-731-1985 Direct Fax  
File #: 207587

August 21, 2024

***VIA ELECTRONIC FILING***

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

**Re: William Kowalski v. PPL Electric Utilities Corporation**  
**Docket No. C-2024-3049830 and C-2024-3050487**

Dear Secretary Chiavetta:

Attached for filing please find the Unopposed Motion to Consolidate Complaint Proceedings on behalf of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/kl  
Attachment

cc: Certificate of Service

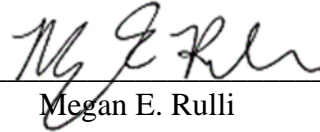
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the filing 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**

William Kowalski, Jr.  
24 Wilcox Drive  
Wilkes-Barre, PA 18705  
[alesandcigars@gmail.com](mailto:alesandcigars@gmail.com)

Date: August 21, 2024



---

Megan E. Rulli

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

William Kowalski Jr.,	:	
	:	
v.	:	Docket No. C-2024-3049830
	:	
PPL Electric Utilities Corporation	:	
William Kowalski Jr.,	:	
	:	
v.	:	Docket No. C-2024-3050487
	:	
PPL Electric Utilities Corporation	:	

---

**NOTICE TO PLEAD**

---

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), ANSWERS TO MOTIONS ARE DUE WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE, UNLESS THE PERIOD OF TIME IS OTHERWISE FIXED BY THE COMMISSION OR THE PRESIDING OFFICER. YOUR ANSWER SHOULD 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.

Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
827 Hausman Road  
Allentown, PA 18104  
Phone: 610-774-2599  
Fax: 610-774-4102  
E-mail: [kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

  
\_\_\_\_\_  
Devin T. Ryan (ID # 316602)  
Post & Schell, P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219  
Phone: 717-612-6052  
Fax: 717-731-1985  
E-mail: [dryan@postschell.com](mailto:dryan@postschell.com)

Megan E. Rulli (ID # 331981)  
Post & Schell, P.C.  
17 North Second St., 12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-612-6012  
E-mail: [mrulli@postschell.com](mailto:mrulli@postschell.com)

Dated: August 21, 2024

Counsel for PPL Electric Utilities Corporation

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

William Kowalski Jr.,	:	
	:	
v.	:	Docket No. C-2024-3049830
	:	
PPL Electric Utilities Corporation	:	

William Kowalski Jr.,	:	
	:	
v.	:	Docket No. C-2024-3050487
	:	
PPL Electric Utilities Corporation	:	

---

**UNOPPOSED MOTION TO CONSOLIDATE OF  
PPL ELECTRIC UTILITIES CORPORATION**

---

**TO PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby moves to consolidate the above-captioned matters pursuant to 52 Pa. Code § 5.81. The Company requests that the proceedings be consolidated for purposes of discovery, hearings, and adjudication because they raise identical issues of fact and law.

As explained herein, these proceedings involve two complaints filed by William Kowalski, Jr. (“Complainant”): against PPL Electric. The respective Formal Complaints filed at Docket Nos. C-2024-3049830 (“First Complaint”) and C-2024-3050487 (“Second Complaint”) involve electric service to the same account and address, and raise issues including difficulty paying under the same existing payment agreement and a desire for a new payment agreement. Therefore, in the interests of administrative efficiency and judicial economy, the Company believes that these

matters should be consolidated. In addition, the Complainant has indicated that he does not oppose the Company's request for consolidation of the proceedings.

In support of this Motion, the Company states as follows:

**I. BACKGROUND**

1. PPL Electric furnishes electric distribution, transmission, and default supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. PPL Electric is a "public utility," an "electric distribution company," and a "default service provider" as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803.

2. PPL Electric was electronically served the above-captioned Formal Complaints on July 1, 2024, and August 1, 2024. The issues raised in the Formal Complaints include concerns about the Complainant's ability to pay pursuant to an existing payment agreement, job loss, and a desire to establish a new payment plan.

**II. MOTION TO CONSOLIDATE**

3. The Company herein respectfully requests that the First and Second Complaints be consolidated for the purposes of discovery, litigation, and disposition because they raise common issues of law and fact.

4. Both Complaints concern electric service at the same service address to the same electric service account. (First Complaint ¶ 1; Second Complaint ¶ 1.)

5. In both Complaints, the Complainant expresses concern about a payment agreement he made with PPL Electric. (First Complaint ¶ 4; Second Complaint ¶ 4).

6. In the First Complaint, the Complainant requests an extension to avoid termination of service. (First Complaint ¶ 5).

7. In the Second Complaint, the Complainant requests a new payment agreement due to his alleged loss of employment. (Second Complaint ¶ 5).

8. As relief, both Complaints request the Commission instate a new payment agreement for same electric service account. (First Complaint ¶ 5; Second Complaint ¶ 5). Depending on the cases' outcomes, the Commission theoretically could grant relief in the two cases that conflicts or is inconsistent.

9. If these cases were to proceed independently and not be consolidated, there would be substantial overlapping issue of law and fact in the cases.

10. Therefore, it would be a misuse of administrative and judicial resources to litigate these matters separately when they raise common issues of fact and law and involve the same Complainant.

11. Thus, the consolidation of these proceedings will promote the efficient use of the time and resources of the parties and the Commission.

12. Further, the Complainant has indicated that he does not object to the consolidation of the above-captioned proceedings.

13. For these reasons, the Company respectfully requests that these proceedings be consolidated for purposes of discovery, litigation, and disposition.

**III. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission enter an order consolidating the Formal Complaint proceedings at Docket Nos. C-2024-3049830 and C-2024-3050487 for purposes of discovery, litigation, and disposition.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
827 Hausman Road  
Allentown, PA 18104  
Phone: 610-774-2599  
Fax: 610-774-4102  
E-mail: [kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

---

Devin T. Ryan (ID # 316602)  
Post & Schell, P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219  
Phone: 717-612-6052  
Fax: 717-731-1985  
E-mail: [dryan@postschell.com](mailto:dryan@postschell.com)

Megan E. Rulli (ID # 331981)  
Post & Schell, P.C.  
17 North Second St., 12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-612-6012  
Fax: 717-731-1985  
E-mail: [mrulli@postschell.com](mailto:mrulli@postschell.com)

Dated: August 21, 2024

Attorneys for PPL Electric Utilities Corporation