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File #: 202795

October 23, 2024

***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: Yvonne Wright-Nnadi v. PPL Electric Utilities Corporation**  
**Docket No. F-2024-3050106**

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Dear Secretary Chiavetta:

Attached for filing please find a Motion for Continuance 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/dmc  
Attachment

cc: The Honorable Marta Guhl (*via email; w/attachments*)  
Certificate of Service

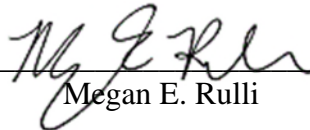
**CERTIFICATE OF SERVICE**

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**

Yvonne Wright-Nnadi  
603 Maplewood Court  
Saylorsburg, PA 18353  
Yfw1988@gmail.com

Date: October 23, 2024

  
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Megan E. Rulli

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Yvonne Wright-Nnadi,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. F-2024-3050106
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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**UNOPPOSED MOTION FOR CONTINUANCE AND  
TRANSFER TO MEDIATION UNIT OF  
PPL ELECTRIC UTILITIES CORPORATION**

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TO ADMINISTRATIVE LAW JUDGE MARTA GUHL:

PPL Electric Utilities Corporation (“PPL Electric” or “Company”) hereby files this Unopposed Motion for a Continuance pursuant to Section 5.103 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.103, and requests that the evidentiary hearing scheduled for October 29, 2024, in the above-captioned Complaint proceeding be continued and that the matter be transferred to the Commission’s mediation unit to be scheduled for a formal mediation session.

Good cause exists to grant a continuance and schedule this matter for a formal mediation session because it would allow the parties to: (1) review Ms. Wright-Nnadi’s billing questions with a neutral third-party present; (2) discuss the meter testing process and allow time for the Complainant’s meter to be tested; and (3) resolve all or some of the issues raised in the Complaint in a non-adversarial setting. In addition, Yvonne Wright-Nnadi (“Complainant”) has indicated

that she does not oppose the Company's request for a continuance and consents to mediation in this matter.

In support of the Unopposed Motion for Continuance and Transfer to the Mediation Unit, PPL Electric avers as follows:

**I. BACKGROUND**

1. PPL Electric furnishes electric service 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. PPL Electric is a "public utility" and an "electric distribution company" as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803.

2. On July 16, 2024, the Company was served with the above-captioned Complaint via Secretarial Letter from the Commission.

3. In the Complaint, the Complainant alleges that her electric service bills contain incorrect charges due to errors in billing. The Complaint also contains a request for a payment agreement and alleges that the Complainant has received a termination notice from the Company.

4. On August 5, 2024, PPL Electric filed an Answer to the Complaint, admitting in part and denying in part the factual basis of the Complainant's allegations.

5. On August 14 2024, the Commission issued an Initial Call-In Telephonic Hearing Notice, scheduling an evidentiary hearing for 10:00 AM on October 29, 2024, before Administrative Law Judge Marta Guhl (the "ALJ").

6. On September 10, 2024, the ALJ issued a Prehearing Order confirming the date and time of the evidentiary hearing.

7. The evidentiary hearing for this matter is scheduled for 10:00 AM on October 29, 2024.

## **II. REQUEST FOR CONTINUANCE**

8. PPL Electric respectfully requests a continuance of the evidentiary hearing and for this matter to be transferred to the Commission's mediation unit because it would allow the parties to: (1) review Ms. Wright-Nnadi's billing questions with a neutral third-party present; (2) discuss the meter testing process and allow time for the Complainant's meter to be tested; and (3) resolve all or some of the issues raised in the Complaint in a non-adversarial setting.

9. Section 1.15(b) of the Commission's regulations states:

(b) Except as otherwise provided by statute, requests for continuance of hearings or for extension of time in which to perform an act required or allowed to be done at or within a specified time by this title or by order of the Commission or the presiding officer, shall be by motion in writing, timely filed with the Commission, stating the facts on which the application rests, except that during the course of a proceeding, the requests may be made by oral motion in the hearing before the Commission or the presiding officer. Only for good cause shown will requests for continuance be considered. The requests for a continuance should be filed at least 5 days prior to the hearing date.

52 Pa. Code § 1.15(b).

10. In addition, the Prehearing Order issued on September 10, 2024, provides the following:

You may request a continuance of the hearing if you have a good reason. Continuances will be granted only for good cause. To request a continuance, you must submit a written request to me and every other party (a "motion") at least five (5) days before the hearing. Your motion should be served pursuant to paragraph 5 below. Your motion should include:

- (1) The case name, case number, and hearing date;
- (2) The reason you are requesting a continuance; and
- (3) State whether the other party(s) agrees to the request. If you do not know whether the other party(ies) agrees to the request, state that you do not know.

Prehearing Order, p. 2 (September 10, 2024).

11. Good cause exists to grant a continuance in this matter because the parties require additional time to continue settlement discussions through the Commission's formal mediation process.

12. The issues raised in the Complaint, *inter alia*, concern allegations that the Complainant's electric service bills contain incorrect charges due to billing errors on the account.

13. After initial settlement discussions with the Complainant, the parties agreed that reviewing the account's billing history with a neutral third party, *i.e.*, a mediator, would allow parties to review and answer the Complainant's billing questions and help resolve some or all of the issues raised in the Complaint in a non-adversarial setting.

14. A continuance of the scheduled evidentiary hearing would afford the parties the opportunity to continue these settlement discussions.

15. In addition, PPL Electric seeks to perform a test of the Complainant's meter to ensure that it is registering the Complainant's electric usage accurately.

16. To this end, on September 11, 2024, the Company visited the Complainant's service address to remove and replace the meter for testing. However, the Complainant indicated at that time that she did not want her meter tested and the Company representative agreed to wait to test the meter until she provided consent.

17. While the Company maintains that the meter at the Complainant's service address is its property that can be removed and tested without consent, the Company seeks to ensure the Complainant understands the meter testing process and purpose prior to the removal of the meter for testing.

18. Granting the requested continuance will provide the Company with the time to further discuss the meter testing process and ensure the meter has been tested prior to any

evidentiary hearing held in this matter, so that the Company can defend itself against any claims that the alleged billing errors were due to the meter's inaccuracy.

19. Finally, the Company notes that this is the first continuance requested in this matter.

20. Thus, good cause exists to continue the hearing given both parties' desire to pursue resolution of the issues raised in the Complaint through mediation.

21. PPL Electric can represent that the Complainant does not oppose the Company's request for a continuance and has consented to mediation in this matter.

22. For these reasons, PPL Electric respectfully requests a continuance of the hearing and for this matter to be transferred to the Commission's mediation unit to be scheduled for a formal mediation session.

**CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that a continuance of the hearing be granted in the above-captioned proceeding.

Respectfully submitted,

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Date: October 23, 2024

Attorneys for PPL Electric Utilities Corporation