
Alice A. Wade

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File #: 208946

January 24, 2025

VIA EMAIL

Honorable Gail Chiodo
Administrative Law Judge
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: **Dawn Crawford v. PPL Electric Utilities Corporation**
Docket No: C-2024-3051621

Your Honor:

Please let this letter serve as objections to the exhibits of Dawn Crawford (“Complainant”) served upon PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) on January 14, 2025. The hearing in the above referenced Complaint took place on Friday, January 10, 2025. During the hearing Counsel for PPL Electric (“Counsel”) discovered that the Complainant filed additional documentary information at the docket on November 14, 2024, but Counsel was not served these documents.¹ After reviewing the Daily Actions report for the docket, it appears these documents were removed from the public docket on November 20, 2024. Judge Chiodo emailed Counsel and the Complainant this additional information on January 14, 2025, and gave PPL Electric a deadline of Friday, January 24, 2025 to object.

PPL Electric objects to the proposed exhibits of the Complainant as follows:

¹ The Complainant did send a number of documents to Counsel in the days before the hearing beginning on January 8, 2025, some of which were included in the Proposed Exhibits filed at the docket, however, at the time of the hearing, Counsel did not know whether there was overlap between the Proposed Exhibits and what was provided via email from the Complainant.

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(1) SPCA surrender/release form document dated 7/3/2024 & (4) Thomas Edison Electric, dated 8/1/2024, “page 1 of 6”

PPL Electric objects to the exhibits marked 1 and 4 for lack of foundation. It does not appear that either of these documents were created by the Complainant. The Complainant did not call the witnesses who prepared these documents. Thus, there is no assurance of their authenticity. As such, PPL Electric objects to their admission into evidence.

(2) Orkin “bed bug inspection report” dated 8/12/2024

PPL Electric objects to this exhibit for lack of foundation. This exhibit appears to be a photograph of a bed bug inspection report with an Orkin logo in the top left corner. The text on the photograph, however, appears to have been added to the report after the photograph was taken. In the comments section of the report it lists the amount the customer paid twice, and then goes on to say, “Electricity has been shut off for about 2 weeks. Unknown why. No reason. Please reinstate ASAP.” That an employee for an extermination company would opine on the electric service strains credulity. The Complainant did not call as a witness the inspector who prepared this report. The document itself contains no information about who prepared it. There is, therefore, no assurance of its authenticity. PPL Electric, therefore, objects to its admission into evidence.

(3) Pages 7-8 (homeowners policy with American Modern logo for policy period 09/20/2024 – 09/20/2025)

PPL Electric objects to this exhibit on the basis of relevance. Whether the Complainant has an insurance policy at the service address is not relevant to whether service should not have been terminated or should be restored.

For the reasons stated above, PPL Electric objects to the admission of the Complainant’s proposed exhibits.

Respectfully submitted,



Alice A. Wade
Associate

AAW
Attachments

cc: Rosemary Chiavetta, Secretary
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 E-MAIL AND FIRST CLASS MAIL

Dawn Renee Crawford
549 Chestnut Street
Kulpmont, PA 17834
dawnrenee666@aol.com

Dated: January 24, 2024



Alice A. Wade