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Nicholas A. Stobbe

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File # 205250

February 12, 2025

***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: Nieves Abad v. PPL Electric Utilities Corporation**  
**Docket No. C-2024-3047163**

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Dear Secretary Chiavetta:

Attached for filing is the Answer nunc pro tunc of PPL Electric Utilities Corporation to the Motion for Sanctions of Nieves Abad in the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Nicholas A. Stobbe

NAS/dmc  
Attachments

cc: The Honorable Alphonso Arnold III (*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**

Nieves Abad  
747 Delaware Street  
Forest City, PA 18421  
[Martjua3@aol.com](mailto:Martjua3@aol.com)

Date: February 12, 2025



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Nicholas A. Stobbe

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nieves Abad,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3047163
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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**ANSWER NUNC PRO TUNC OF PPL ELECTRIC UTILITIES CORPORATION TO  
THE MOTION FOR SANCTIONS OF NIEVES ABAD**

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**TO ADMINISTRATIVE LAW JUDGE ALPHONSO ARNOLD III:**

Pursuant to 52 Pa. Code § 5.371(b), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Answer *nunc pro tunc* to Nieves Abad’s (“Complainant”) January 30, 2025 Motion for Sanctions (“Sanctions Motion”). As explained herein, PPL Electric respectfully submits that Administrative Law Judge Alphonso Arnold III (the “ALJ”) should deny the Complainant’s latest Motion.

By way of background, PPL Electric was served with the Sanctions Motion on January 30, 2025. However, due to administrative oversight on the part of PPL Electric and its Counsel, the Company did not file an Answer to the Sanctions Motion within five (5) days as dictated by 52 Pa. Code § 5.371(b). Upon discovery of this oversight, PPL Electric counsel moved expeditiously to file a responsive pleading to the Complaint to address the issues raised in the Sanctions Motion. Thus, the Company herein requests leave to file this Answer *nunc pro tunc*. This Answer *nunc pro tunc* is being filed concurrently with a Motion to File an Answer to the Complainant’s Sanctions

Motion *nunc pro tunc*. The Complainant is not prejudiced by PPL Electric’s request for leave to file this Answer *nunc pro tunc*. The deadline for filing the Company’s Answer to the Complaint was January 4, 2025. However, no litigation schedule has been set in this proceeding, nor has an Evidentiary Hearing been scheduled. Thus, PPL Electric’s delay in answering the Sanctions Motion does not prejudice the Complainant, nor delay the proceeding, in any way.<sup>1</sup>

PPL Electric submits that the Sanctions Motion should be denied. The reasons for this are several.

First, the ALJ has already ruled on many of the issues identified in the Sanctions Motion, therefore, the Complainant’s requested relief in the Sanctions Motion is largely moot.

Second, the Sanctions Motion is another attempt by the Complainant to unreasonably harass, annoy, and cause expense to PPL Electric. Indeed, the Complainant has propounded more than 20-sets of discovery on the Company in the form of written depositions, interrogatories, and requests for production of documents throughout this proceeding. Many of these discovery sets are comprised of around – or more than – one-hundred (100) individual questions, and many have multiple subparts. PPL Electric has properly objected to most of these requests, and is continuing to work on the responses that remain outstanding. Given the sheer volume of requests propounded by the Complainant in this customer-complaint proceeding, PPL Electric submits that the Complainant is using the discovery process in bad faith.

Third, much of the Sanctions Motion is procedurally and substantively irrelevant. Indeed, the Complainant seeks to shoehorn factual disputes and legal arguments related to those factual

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<sup>1</sup> The Commission has recognized and accepted a utility’s Answer *nunc pro tunc* where it did not affect the substantive rights of the Complainant, as is the case here. *See Roberts v. PECO Energy Co.*, 2020 PA. PUC LEXIS 361, Docket No. F-2018-3001072 (Order Entered Jan. 16, 2020); *See also Cobaugh v. Columbia Gas of Pa., Inc.* 2011 Pa. PUC LEXIS 282, Docket No. C-2009-2146579 (Initial Decision issued Oct. 21, 2011) *adopted without further Commission action* (Final Order entered Dec. 12, 2011); *See also* 52 Pa. Code § 1.2(c) (“the Commission or presiding officer at any stage of an action or proceeding may waive a requirement of this subpart when necessary or appropriate, if the waiver does not adversely affect a substantive right of a party.”)

disputes into the Sanctions Motion. These are not properly addressed through levying sanctions on either party, rather, addressed through testimony and legal argumentation following the evidentiary hearing. To the extent that the Complainant disagrees with answers or facts presented by PPL Electric, he is at liberty to make arguments or representations to the contrary at the appropriate time through testimony. To award sanctions related to a factual dispute, however, is inappropriate and does not meet the standards elucidated in 52 Pa. Code § 5.371.

PPL Electric responds to each of the separately-numbered paragraphs of the Complaint as follows:

**ANSWER NUNC PRO TUNC**

1. Paragraph 1 of the Sanctions Motion relates to an issue already ruled upon in this proceeding, *i.e.*, the provision of discovery answers by Mr. John Rosato. *See* Order Granting in Part and Denying in Part Complainant’s Motion to Compel (Order issued January 8, 2025) (“*January 8, 2025 Order*”). Thus, the Complainant’s arguments related to the same are moot and should be denied, and are not grounds for sanctions against PPL Electric. The Complainant does not contend that PPL Electric has not complied with the *January 8, 2025 Order* as to these requests.

2. Paragraph 2 of the Sanctions Motion relates to an issue already ruled upon in this proceeding, *i.e.*, the provision of discovery answers by Mr. Tim Roberts. *See January 8, 2025 Order*. Thus, the Complainant’s arguments related to the same are moot and should be denied, and are not grounds for sanctions against PPL Electric. The Complainant does not contend that PPL Electric has not complied with the *January 8, 2025 Order* as to these requests.

3. Paragraph 3 of the Sanctions Motion relates to an issue already ruled upon in this proceeding, *i.e.*, the provision of discovery answers by Mr. Bill Farber. *See January 8, 2025 Order*. Thus, the arguments related to the same are moot and should be denied, and are not grounds

for sanctions against PPL Electric. The Complainant does not contend that PPL Electric has not complied with the *January 8, 2025 Order* as to these requests.

4. PPL Electric is continuing to work on providing its answers to the referenced interrogatories. However, due to the thousands of discovery requests already responded and/or objected to in this proceeding, and the number of Motions filed by the Complainant, the Company's resources for answering these requests is limited. The Company intends to provide responses to these requests as soon as practicable and will serve the same upon the Complainant. Moreover, the delay in these responses has not prejudiced the Complainant. Indeed, there is no litigation schedule established in this proceeding as of the date of this Answer *nunc pro tunc*, and the Complainant does not provide any evidence that he's been placed at an "unfair disadvantage."

5. This purported grounds for sanctions is moot. The referenced responses have been provided to the Complainant, nor are/were these responses subject to a Motion to Compel, thus, should not be considered here.

6. This purported grounds for sanctions is moot. The referenced responses have been provided to the Complainant, nor are/were these responses subject to a Motion to Compel, thus, should not be considered here.

7. This is a procedurally concern that PPL Electric can remedy and is working to remedy. 52 Pa. Code § 1.1 *et seq.* governs the rules of administrative practice and procedure before the Commission. 52 Pa. Code § 1.2(a) states that the Commission's procedural rules in Title 52 shall be "liberally construed to secure the just, speedy, and inexpensive determination of every action or proceeding to which it is applicable." Further, the Commission's regulations state that the "Commission or presiding officer at any stage of an action or proceeding may disregard an error or defect of procedures which does not affect the substantive rights of the parties." *Id.*

Additionally, 52 Pa. Code § 1.2(c) states that the “Commission or presiding officer at any stage of an action or proceeding may waive a requirement of this subpart when necessary or appropriate, if the waiver does not adversely affect a substantive right of a party.”<sup>2</sup> Here, the failure to provide verifications with the specified responses does not adversely affect any substantive right of the Complainant. Again, PPL Electric is working to provide the requisite verifications to the Complainant, and the Complainant has not been prejudiced or delayed in any way as a result of their non-inclusion as evidence has not been accepted nor offered in this proceeding, and there is no evidentiary hearing scheduled.

8. This is a procedurally concern that PPL Electric can remedy and is working to remedy. 52 Pa. Code § 1.1 *et seq.* governs the rules of administrative practice and procedure before the Commission. 52 Pa. Code § 1.2(a) states that the Commission’s procedural rules in Title 52 shall be “liberally construed to secure the just, speedy, and inexpensive determination of every action or proceeding to which it is applicable.” Further, the Commission’s regulations state that the “Commission or presiding officer at any stage of an action or proceeding may disregard an error or defect of procedures which does not affect the substantive rights of the parties.” *Id.* Additionally, 52 Pa. Code § 1.2(c) states that the “Commission or presiding officer at any stage of an action or proceeding may waive a requirement of this subpart when necessary or appropriate, if the waiver does not adversely affect a substantive right of a party.”<sup>3</sup> Here, the failure to provide verifications with the specified responses does not adversely affect any substantive right of the Complainant. Again, PPL Electric is working to provide the requisite verifications to the Complainant, and the Complainant has not been prejudiced or delayed in any way as a result of

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<sup>2</sup> See *Info. Connections v. Pa. Pub. Util. Comm'n*, 630 A.2d 498, 501 (Pa. Cmwlth. 1993).

<sup>3</sup> See *Info. Connections v. Pa. Pub. Util. Comm'n*, 630 A.2d 498, 501 (Pa. Cmwlth. 1993).

their non-inclusion as evidence has not been accepted nor offered in this proceeding, and there is no evidentiary hearing scheduled.

9. This is a procedurally concern that PPL Electric can remedy and is working to remedy. 52 Pa. Code § 1.1 *et seq.* governs the rules of administrative practice and procedure before the Commission. 52 Pa. Code § 1.2(a) states that the Commission’s procedural rules in Title 52 shall be “liberally construed to secure the just, speedy, and inexpensive determination of every action or proceeding to which it is applicable.” Further, the Commission’s regulations state that the “Commission or presiding officer at any stage of an action or proceeding may disregard an error or defect of procedures which does not affect the substantive rights of the parties.” *Id.* Additionally, 52 Pa. Code § 1.2(c) states that the “Commission or presiding officer at any stage of an action or proceeding may waive a requirement of this subpart when necessary or appropriate, if the waiver does not adversely affect a substantive right of a party.”<sup>4</sup> Here, the failure to provide verifications with the specified responses does not adversely affect any substantive right of the Complainant. Again, PPL Electric is working to provide the requisite verifications to the Complainant, and the Complainant has not been prejudiced or delayed in any way as a result of their non-inclusion as evidence has not been accepted nor offered in this proceeding, and there is no evidentiary hearing scheduled.

10. This is a procedurally concern that PPL Electric can remedy and is working to remedy. 52 Pa. Code § 1.1 *et seq.* governs the rules of administrative practice and procedure before the Commission. 52 Pa. Code § 1.2(a) states that the Commission’s procedural rules in Title 52 shall be “liberally construed to secure the just, speedy, and inexpensive determination of every action or proceeding to which it is applicable.” Further, the Commission’s regulations state that

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<sup>4</sup> See *Info. Connections v. Pa. Pub. Util. Comm'n*, 630 A.2d 498, 501 (Pa. Cmwlth. 1993).

the “Commission or presiding officer at any stage of an action or proceeding may disregard an error or defect of procedures which does not affect the substantive rights of the parties.” *Id.* Additionally, 52 Pa. Code § 1.2(c) states that the “Commission or presiding officer at any stage of an action or proceeding may waive a requirement of this subpart when necessary or appropriate, if the waiver does not adversely affect a substantive right of a party.”<sup>5</sup> Here, the failure to provide verifications with the specified responses does not adversely affect any substantive right of the Complainant. Again, PPL Electric is working to provide the requisite verifications to the Complainant, and the Complainant has not been prejudiced or delayed in any way as a result of their non-inclusion as evidence has not been accepted nor offered in this proceeding, and there is no evidentiary hearing scheduled.

11. This is a procedurally concern that PPL Electric **has** remedied. 52 Pa. Code § 1.1 *et seq.* governs the rules of administrative practice and procedure before the Commission. 52 Pa. Code § 1.2(a) states that the Commission’s procedural rules in Title 52 shall be “liberally construed to secure the just, speedy, and inexpensive determination of every action or proceeding to which it is applicable.” Further, the Commission’s regulations state that the “Commission or presiding officer at any stage of an action or proceeding may disregard an error or defect of procedures which does not affect the substantive rights of the parties.” *Id.* Additionally, 52 Pa. Code § 1.2(c) states that the “Commission or presiding officer at any stage of an action or proceeding may waive a requirement of this subpart when necessary or appropriate, if the waiver does not adversely affect a substantive right of a party.”<sup>6</sup> As the Complainant correctly notes, the requisite verification has since been provided to the Complainant, thus, this issue is moot.

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<sup>5</sup> See *Info. Connections v. Pa. Pub. Util. Comm'n*, 630 A.2d 498, 501 (Pa. Cmwlth. 1993).

<sup>6</sup> See *Info. Connections v. Pa. Pub. Util. Comm'n*, 630 A.2d 498, 501 (Pa. Cmwlth. 1993).

12. This is a procedurally concern that PPL Electric can remedy and is working to remedy. 52 Pa. Code § 1.1 *et seq.* governs the rules of administrative practice and procedure before the Commission. 52 Pa. Code § 1.2(a) states that the Commission’s procedural rules in Title 52 shall be “liberally construed to secure the just, speedy, and inexpensive determination of every action or proceeding to which it is applicable.” Further, the Commission’s regulations state that the “Commission or presiding officer at any stage of an action or proceeding may disregard an error or defect of procedures which does not affect the substantive rights of the parties.” *Id.* Additionally, 52 Pa. Code § 1.2(c) states that the “Commission or presiding officer at any stage of an action or proceeding may waive a requirement of this subpart when necessary or appropriate, if the waiver does not adversely affect a substantive right of a party.”<sup>7</sup> Here, the failure to provide verifications with the specified responses does not adversely affect any substantive right of the Complainant. Again, PPL Electric is working to provide the requisite verifications to the Complainant, and the Complainant has not been prejudiced or delayed in any way as a result of their non-inclusion as evidence has not been accepted nor offered in this proceeding, and there is no evidentiary hearing scheduled.

13. This is a procedurally concern that PPL Electric can remedy and is working to remedy. 52 Pa. Code § 1.1 *et seq.* governs the rules of administrative practice and procedure before the Commission. 52 Pa. Code § 1.2(a) states that the Commission’s procedural rules in Title 52 shall be “liberally construed to secure the just, speedy, and inexpensive determination of every action or proceeding to which it is applicable.” Further, the Commission’s regulations state that the “Commission or presiding officer at any stage of an action or proceeding may disregard an error or defect of procedures which does not affect the substantive rights of the parties.” *Id.*

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<sup>7</sup> See *Info. Connections v. Pa. Pub. Util. Comm'n*, 630 A.2d 498, 501 (Pa. Cmwlth. 1993).

Additionally, 52 Pa. Code § 1.2(c) states that the “Commission or presiding officer at any stage of an action or proceeding may waive a requirement of this subpart when necessary or appropriate, if the waiver does not adversely affect a substantive right of a party.”<sup>8</sup> Here, the failure to provide verifications with the specified responses does not adversely affect any substantive right of the Complainant. Again, PPL Electric is working to provide the requisite verifications to the Complainant, and the Complainant has not been prejudiced or delayed in any way as a result of their non-inclusion as evidence has not been accepted nor offered in this proceeding, and there is no evidentiary hearing scheduled.

14. This is a procedurally concern that PPL Electric can remedy and is working to remedy. 52 Pa. Code § 1.1 *et seq.* governs the rules of administrative practice and procedure before the Commission. 52 Pa. Code § 1.2(a) states that the Commission’s procedural rules in Title 52 shall be “liberally construed to secure the just, speedy, and inexpensive determination of every action or proceeding to which it is applicable.” Further, the Commission’s regulations state that the “Commission or presiding officer at any stage of an action or proceeding may disregard an error or defect of procedures which does not affect the substantive rights of the parties.” *Id.* Additionally, 52 Pa. Code § 1.2(c) states that the “Commission or presiding officer at any stage of an action or proceeding may waive a requirement of this subpart when necessary or appropriate, if the waiver does not adversely affect a substantive right of a party.”<sup>9</sup> Here, the failure to provide verifications with the specified responses does not adversely affect any substantive right of the Complainant. Again, PPL Electric is working to provide the requisite verifications to the Complainant, and the Complainant has not been prejudiced or delayed in any way as a result of

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<sup>8</sup> See *Info. Connections v. Pa. Pub. Util. Comm'n*, 630 A.2d 498, 501 (Pa. Cmwlth. 1993).

<sup>9</sup> See *Info. Connections v. Pa. Pub. Util. Comm'n*, 630 A.2d 498, 501 (Pa. Cmwlth. 1993).

their non-inclusion as evidence has not been accepted nor offered in this proceeding, and there is no evidentiary hearing scheduled.

15. This is a procedurally concern that PPL Electric can remedy and is working to remedy. 52 Pa. Code § 1.1 *et seq.* governs the rules of administrative practice and procedure before the Commission. 52 Pa. Code § 1.2(a) states that the Commission’s procedural rules in Title 52 shall be “liberally construed to secure the just, speedy, and inexpensive determination of every action or proceeding to which it is applicable.” Further, the Commission’s regulations state that the “Commission or presiding officer at any stage of an action or proceeding may disregard an error or defect of procedures which does not affect the substantive rights of the parties.” *Id.* Additionally, 52 Pa. Code § 1.2(c) states that the “Commission or presiding officer at any stage of an action or proceeding may waive a requirement of this subpart when necessary or appropriate, if the waiver does not adversely affect a substantive right of a party.”<sup>10</sup> Here, the failure to provide verifications with the specified responses does not adversely affect any substantive right of the Complainant. Again, PPL Electric is working to provide the requisite verifications to the Complainant, and the Complainant has not been prejudiced or delayed in any way as a result of their non-inclusion as evidence has not been accepted nor offered in this proceeding, and there is no evidentiary hearing scheduled.

16. The Complainant’s argument that PPL Electric’s Counsel is “financially interested in this action” is an incorrect reading of 52 Pa. Code § 5.346(b). That provision of the Commission’s regulations provides that:

No deposition may be taken before a person who is a relative, employe or attorney of any of the parties, who is a relative or employe of the attorney, or who is financially interested in the action.

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<sup>10</sup> See *Info. Connections v. Pa. Pub. Util. Comm'n*, 630 A.2d 498, 501 (Pa. Cmwlth. 1993).

If the Complainant's reading of this provision were accepted, it would effectively result in Counsel for PPL Electric not being able to review PPL Electric's responses to written depositions, nor the written depositions themselves as served by the Complainant upon PPL Electric's counsel. This reading is untenable and should be rejected.

17. This argument is irrelevant and the Complainant's referenced exhibits indicate the same. Indeed, throughout this process, the Complainant has asked the same question – or hundreds of questions – of multiple PPL Electric witnesses. There is no mystery as to why the answers to the same questions are quite similar. Because the answers reflect that witness's understanding of what the question is seeking.

18. This is purely a factual dispute and legal argument that is not properly addressed in a Sanctions Motion.

19. These concerns and arguments are moot. Indeed, as the Complainant recognizes, PPL Electric answered the referenced questions in "acceptable form." Moreover, the relative delay in answering of this discovery does not prejudice the Complainant in any way as there is no procedural schedule adopted in this proceeding, nor has there been an Evidentiary Hearing set.

20. These concerns and arguments are moot. Indeed, as the Complainant recognizes, PPL Electric answered the referenced questions in "acceptable form." Moreover, the relative delay in answering of this discovery does not prejudice the Complainant in any way as there is no procedural schedule adopted in this proceeding, nor has there been an Evidentiary Hearing set.

21. The concerns in Paragraph 21 of the Sanctions Motion are irrelevant. To the extent that the Complainant is unsatisfied with responses provided in discovery, the Complainant is free to make formal follow-up requests of the Company, or file a Motion to Compel. Moreover, the

Complainant is free to cross-examine any witnesses that PPL Electric ultimately presents at a future Evidentiary Hearing in this matter, as is appropriate for these factual disputes.

22. The allegations in Paragraph 22 primarily relate to information that PPL Electric has either: (1) already provided as available; or (2) information not available or not in the possession of PPL Electric. Indeed, throughout this proceeding, the Complainant has made various requests of PPL Electric and its employees to provide documents and information that PPL Electric cannot provide. This is particularly true of information sought by the Complainant related to subcontractors that may or may not have any knowledge regarding the subject of the Complaint. To the extent that the Complainant seeks information from these non-parties, there are mechanisms available to allow him to do so without PPL Electric acting as the conduit for the same.

23. PPL Electric denies that it has withheld evidence from the Complainant. Indeed, throughout this proceeding, the Complainant has made various requests of PPL Electric and its employees to provide documents and information that PPL Electric cannot provide. This is particularly true of information sought by the Complainant related to subcontractors that may or may not have any knowledge regarding the subject of the Complaint. To the extent that the Complainant seeks information from these non-parties, there are mechanisms available to allow him to do so without PPL Electric acting as the conduit for the same.

24. Paragraph 24 of the Sanctions Motion contain a series of factual allegations levied by the Complainant that are not properly addressed through a Sanctions Motion. Moreover, the Complainant acknowledges that PPL Electric has provided answers to the referenced discovery requests.

25. Paragraph 25 of the Sanctions Motion contain a series of factual allegations levied by the Complainant that are not properly addressed through a Sanctions Motion. Moreover, the

Complainant acknowledges that PPL Electric has provided answers to the referenced discovery requests. To the extent that the Complainant disagrees with the answers provided, he is free to present evidence to the contrary at the Evidentiary Hearing and/or through pre-served testimony.

26. The allegations in Paragraph 26 primarily relate to information that PPL Electric has either: (1) already provided as available; or (2) information not available or not in the possession of PPL Electric. Indeed, throughout this proceeding, the Complainant has made various requests of PPL Electric and its employees to provide documents and information that PPL Electric cannot provide. This is particularly true of information sought by the Complainant related to subcontractors that may or may not have any knowledge regarding the subject of the Complaint. To the extent that the Complainant seeks information from these non-parties, there are mechanisms available to allow him to do so without PPL Electric acting as the conduit for the same.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Motion for Sanctions of Nieves Abad be denied in its entirety.

Respectfully submitted,



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Dated: February 12, 2025

Attorneys for PPL Electric Utilities Corporation