
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad
(Pro-Se)

Complainant

VS

PPL Electric Utilities Corporation

C-2024-3047163

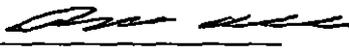
Respondent

RE: Nieves Avad V, PPL Electric Utilities Corporation
Docket No. C-2024-3047163

To Whom This May Concern,

Attached for answer is Objection To PPL's Motion For Leave served Upon Respondent by Nieves Abad in the Above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Alphonso Arnold III
Administrative Law Judge
400 North St
Harrisburg, PA 17120
Pennsylvania Public Utility Commission
Email-Alphoarno@pa.gov


Nieves Abad
747 Delaware St
Forest City, PA 18421
Email- Martjua3@aol.com
Phone - 631-575-2348
Dated- February 18, 2025

Rosemary Chiavetta
400 North Street, 2nd Floor North
P.O BOX 3265
Harrisburg, PA 17105-3265

Peter J Kramer Esquire
Post & Schell
Three Logan Square
1717 Arch Street

DATE OF DEPOSIT

FEB 18 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad
(Pro-Se)

Complainant

vs.

PPL Electric Utilities Corporation
Respondent

AFFIDAVIT

Docket No. C-2024-3047163

AFFIDAVIT

I, Nieves Abad, verify that I am the Complainant in the Complaint, and that the facts contained in the foregoing Objection To PPL's Motion For Leave are true and correct to the best of my knowledge, information and belief, and that this verification is subject to the penalties of 18 Pa. C.S A 4904 relative to unsworn falsification to authorities.

CC:

Alphonso Arnold III
Administrative Law Judge
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
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Rosemary Chiavetta
Secretary of The Commission
Commonwealth Keystone Building
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad

(Pro-Se)

Complainant,

VS

PPL Electric Utilities Corporation

C-2024-3047163

Respondent,

OBJECTION TO PPL's MOTION FOR LEAVE

TO THE PENNSYLVANIA PUBLIC UTILITY COMPANY:

Nieves Abad,(hereon in Complainant), hereby files this Objection To Motion For Leave and paragraphs 1-11 within this motion, filed by PPL Electric Utility Company (hereon in PPL) and respectfully asks Administrative Law Judge Alphonso Arnold III (hereon in ALJ) and the Public Utility Commission (hereon in PUC) to except the Complainants objections as follows;

1. On January 30 2025, Complainant filed for sanctions against PPL with the PUC regarding several matters.On this day PPL was served also with a notice to plead. (See Appendix 1 Notice to Plead). On this notice to plead it clearly states PPL has five days to respond to the sanctions brief. On February 5, 2025, the Complainant did not receive a response from PPL. On February 12, 2025, PPL filed for A Motion For Leave to file answers to Complainant's Motion For Sanctions Nunc Pro Tunc. Additionally PPL also filed on this date

answers Nunc Pro Tunc of PPL to the Motion for Sanctions of Nieves Abad. PPL does not refute the fact that these briefs were being submitted untimely. (See PPL's brief for motion to leave to file answer to complainants motion for sanctions nunc pro tunc paragraph numbers 1,2,&3.)

Pa Title 52 Chapter § 1.15. Extensions of time and continuances.

(a) Extensions of time shall be governed by the following:

(1) Except as otherwise provided by statute, whenever under this title or by order of the Commission, or notice given thereunder, an act is required or allowed to be done at or within a specified time, the time fixed or the period of time prescribed may, by the Commission, the presiding officer or other authorized person, for good cause be extended upon motion made before expiration of the period originally prescribed or as previously extended. Upon motion made after the expiration of the specified period, the act may be permitted to be done where reasonable grounds are shown for the failure to act.

(2) Requests for the extension of time in which to file briefs shall be filed at least 5 days before the time fixed for filing the briefs unless the presiding officer, for good cause shown, allows a shorter time.

On January 30 2025, the Complainant notified PPL Attorneys Peter Kramer, Nicholas Strobbe and Devin Ryan by email of The Motion for Sanctions, and the notice to plead. PPL was also served by certified mail through its attorney Peter Kramer If an extension was needed by PPL, they did not use the appropriate course of action as stated above. On February 12, 2025, PPL is now asking for an extension, after the period of time to answer for these sanctions were past due. PPL did not file this request timely in accordance with Pa Title 52 Chapter 1 Section 1.15B.

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"(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."

PPL is now time barred from responding to the motion to sanctions. PPL's motion for leave to file an answer to the complainants motion for sanctions nunc pro tunc and PPL's answer's nunc pro tunc are moot being that they are time barred. The only available option for PPL was to request an extension under section 1.15 which has also expired.

Pa Title 52 Chapter 5 § 5.502. Filing and service of briefs.

(g) *Late-filed briefs.* Briefs not filed and served on or before the dates fixed therefore will not be accepted, except by special permission of the Commission or the presiding officer as permitted under § 1.15 (referring to extensions of time and continuances).

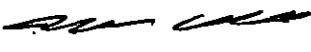
Conclusion

Granting PPL special permission for leave under these circumstances will further discriminate against the Complainant. PPL is a billion dollar corporation with unlimited resources. PPL has several in-house attorneys working on this matter along with a dozen employees from several different departments within PPL. Post & Schell is PPL's attorneys who have several attorneys and several paralegal's actively working to defend PPL. The Complainant is a pro-se applicant

who has been held by the same standards of timeliness as this large entity. PPL and Post & Schell have dozens of years experience of handling cases in front of the PUC. This is another one of PPL's tactics to delay this matter. This is not the first brief where PPL is late. There has been several late briefs with some being overdue by several months. These sanctions are for late briefs amongst other bad faith discovery tactics. Excusing PPL's actions will only encourage PPL's behaviors. PPL mentions on several occasions through their brief that there is no litigation schedule set. This is because PPL has successfully delayed this discovery process by not submitting timely briefs. PPL has extended the discovery period for over six months.

Wherefore, The Complainant, Nieves Abad, requests ALJ to deny PPL's Motion For Leave To File An Answer For Sanctions Nunc Pro Tunc, time bar PPL's Answer Nunc Pro Tunc To The Motion For Sanctions Of Nieves Abad, and/or grant to the Complainant such other relief as is just and reasonable under these circumstances.

Alphonso Arnold III
Administrative Law Judge
400 North St
Harrisburg, PA 17120
Pennsylvania Public Utility Commission
Email-Alphaarno@pa.gov



Nieves Abad
747 Delaware St
Forest City , PA 18421
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Dated- February 18 , 2025

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SECRETARY'S BUREAU**

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Complainant

VS

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C-2024-3047163

Respondent

Notice To Plead

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 Pa. CODE 5.101, YOU MAY FILE AN ANSWER TO THE ENCLOSED MOTION FOR SANCTIONS WITHIN FIVE (5) DAYS OF THE DATE OF SERVICE HEREOF. MUST BE FILED WITH THE SECRETARY ON PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O BOX 3265, HARRISBURG, PA 17120-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED NIEVES ABAD (PRO-SE).

CC:

Alphonso Arnold III
Administrative Law Judge
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Email- alphonarno@pa.gov

Rosemary Chiavetta
Secretary of The Commission
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Email- Maritua3@aol.com
Phone - 631-575-2348
Dated- January 30, 2025

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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

Appendix 1

Nieves Abad
747 Delaware St
Forest City PA 18421



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Secretary of The Commi
400 NORTH ST 2nd
P.O BOX 3265
Harrisburg PA 1710

RECEIVED

FEB 26 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



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2/26/2025 9:59:50 AM

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Agency: PUC

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CMPC