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File #: 211745

April 8, 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: Danielle Brooks v. PPL Electric Utilities Corporation
Docket No. C-2024-3049977**

**Danielle Brooks v. PPL Electric Utilities Corporation
Docket No. C-2025-3053878**

Dear Secretary Chiavetta:

Attached for filing in the above-referenced proceedings is the Motion to Consolidate of PPL Electric Utilities Corporation. Copies are being provided per the Certificate of Service.

Respectfully submitted,


Megan E. Rulli

MER/dmc
Attachment

cc: The Honorable Steven K. Haas (*via email; w/attachment*)
The Honorable Gail M. Chiodo (*via email; w/attachment*)
Certificate of Service

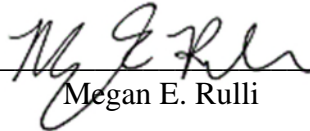
CERTIFICATE OF SERVICE

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

Danielle Brooks
16 Talisman Building
Hershey, PA 17033
danielleabrooks@aol.com

Date: April 8, 2025



Megan E. Rulli

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Danielle Brooks	:	
	:	
v.	:	Docket No. C-2024-3049977
	:	
PPL Electric Utilities Corporation	:	
	:	
Danielle Brooks	:	
	:	
v.	:	Docket No. C-2025-3053878
	:	
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.

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Dated: April 8, 2025

Counsel for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Danielle Brooks	:	
	:	
v.	:	Docket No. C-2024-3049977
	:	
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	:	
PPL Electric Utilities Corporation	:	

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

TO THE 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 Danielle Brooks (“Complainant”): against PPL Electric. The respective Formal Complaints filed at Docket Nos. C-2024-3049977 (“First Complaint”) and C-2025-3053878 (“Second Complaint”) involve electric service to the same account and address, and raise high billing claims related to the same electric service account. 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 she 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 with the above-captioned Formal Complaints on July 9, 2024, and March 11, 2025. The issues raised in the Formal Complaints include claims that the Complainant’s electric service bills contain incorrect charges, specifically that her bills are too high during periods when she alleges that she did not occupy the service address.

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 raises high billing concerns for periods she claims she did not occupy the service address, alleging that the billing is incorrect for those periods. (First Complaint ¶ 4; Second Complaint ¶ 4).

6. In the First Complaint, the Complainant requests that her billing be adjusted “to the correct usage.” (First Complaint ¶ 5).

7. In the Second Complaint, the Complainant requests that the Commission investigate her high billing claims for both her address and more generally at her apartment complex. (Second Complaint ¶ 5).

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

9. 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.

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

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

12. 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-2024-3049977 and C-2025-3053878 for purposes of discovery, litigation, and disposition.

Respectfully submitted,

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Dated: April 8, 2025

Attorneys for PPL Electric Utilities Corporation