

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DeAurdrea Franczak (Long),

Complainant,

v.

PPL Electric Utilities Corporation,

Respondent.

Docket No. C-2025-3055351

FORMAL REPLY TO RESPONDENT'S ANSWER

Complainant DeAurdrea Franczak (Long) respectfully submits this formal reply in response to the Answer filed by Respondent PPL Electric Utilities Corporation ("PPL") dated June 11, 2025. The Complainant opposes PPL's request for dismissal and provides the following detailed facts and clarifications in support of the continued prosecution of this Complaint:

I. FAILURE TO PRESERVE EVIDENCE OF CRUCIAL CALL

On May 22, 2025, the Complainant participated in a 40+ minute telephone conversation with a billing supervisor from PPL. During this call, the representative clearly stated that the debt had been "sold" and that PPL no longer retained the account. This communication contradicts PPL's current assertion in its Answer that the debt was merely "forwarded" to collection agencies.

Complainant issued a written **Preservation of Evidence Request** to PPL shortly after the call and included tracking confirmation of delivery. As of the date of this filing, **PPL has not responded to confirm preservation or availability of this call recording**. This omission obstructs critical fact-finding and is prejudicial to the Complainant's case.

The Complainant respectfully requests the Commission compel Respondent to confirm whether the recording of this call exists, and if not, to explain the grounds for its non-preservation given timely notice.

II. LACK OF ACCOUNT LEDGER OR DOCUMENTATION TO VALIDATE THE DEBT

At no point has PPL provided a full account ledger or a full itemized statement to justify the final amount of \$706.60. Complainant has consistently requested an explanation of how this balance was calculated, especially given prior concerns about unusual billing and meter-related errors. I resided at the residence in question for over three and a half years and I am entitled to the full account ledger for accuracy.

Despite these requests, no ledger or usage history has been disclosed, which has made it impossible to independently verify the validity or origin of the amount in question.

This lack of transparency violates principles of fair billing practices under 66 Pa.C.S. § 1501 and prevents meaningful review of the debt. If PPL itself is unable to verify the charges internally, it should not be permitted to outsource collection activity to third parties.

Additionally, the absence of the full account ledger has deprived the Complainant of the opportunity to obtain an expert opinion from a forensic billing or utility rate analyst.

Without access to the full account history, Complainant is unable to have an independent review completed to determine whether billing irregularities, misapplied payments, or systemic errors contributed to the disputed balance.

III. THIRD-PARTY DEBT COLLECTION AND REMOVAL FROM CREDIT REPORT

On December 11, 2023, PPL placed an account with IC System. Complainant disputed the debt. On or about May 16, 2024, IC System confirmed by letter that the account was being returned to PPL and that no validation documentation was ever provided by PPL.

Subsequently, the collection account was removed from Complainant's credit report with Transunion. This action further demonstrates that the debt was not substantiated and casts serious doubt on PPL's claim that the charges were valid.

Despite this, PPL reassigned the same unverified debt to Torres Credit Services on or around September 11, 2024. Torres also removed the account after Complainant submitted a dispute. At no time between these two placements did PPL produce a full account breakdown or resolve the underlying billing issues.

Complainant notes that a separate federal case has been filed in the Middle District of Florida under the Fair Credit Reporting Act (FCRA). That matter addresses the inaccurate reporting of the disputed collection account and the resulting consumer harm. **The present complaint before the PUC is distinct and concerns the utility's mishandling of billing, internal validation, and communication with third-party collectors.**

Additionally, PPL failed to notify either IC System or Torres Credit Services that the account was disputed by the customer. Critically, Torres was never informed by PPL that IC System had already returned the debt due to the absence of validation documentation. This omission further highlights the breakdown in PPL's duty to ensure that any collection activity was based on accurate and properly communicated information

IV. MISUSE OF OUTDATED ADDRESS AND IMPEDIMENT TO DISPUTE RIGHTS

Complainant further contends that PPL knowingly provided an outdated address to both IC System and Torres Credit Services when referring to the account for collections. PPL was aware that Complainant's services ended in October 2023, and yet directed correspondence and debt placement communications to the service address that had been vacated.

Both debt collectors later cited PPL as the source of the address used and claimed they relied on the "last known address" provided. This deprived the Complainant of fair notice and a reasonable opportunity to contest the debt prior to credit reporting or collection activity.

Sending debt notices to a location where the consumer no longer resides is inconsistent with fair collection and utility practices. Had updated and accurate contact information been used, Complainant would have had the opportunity to properly challenge the debt at the earliest stage.

Moreover, in no correspondence addressed to the Complainant from PPL, IC System, or Torres Credit Services was it indicated that PPL retained ownership of the debt. This absence of disclosure is especially concerning given that PPL's own representatives repeatedly stated during

calls in May 2025 that the account had been sold to a debt collection agency in December 2023. These representations were material and further support the position that Complainant had no basis to believe PPL continued to own or control the account after that time.

V. EVIDENTIARY SUPPORT FOR CLAIMS

To support the factual assertions raised herein, Complainant has included the following documentary evidence as part of this reply:

1. A screenshot of May 22, 2025, call with the PPL billing manager who called me directly, during which the representative confirmed the account had been sold in December 2023.
2. **A letter from I.C. System Inc. dated May 16, 2025**, advising the account was returned to PPL. This correspondence was issued in response to Complainant's request for validation documentation following the filing of regulatory complaints with the credit bureau and the Consumer Financial Protection Bureau. The original version of this letter was sent in May 2024 in connection with the Complainant's CFPB complaint; however, upon Complainant's request, I.C. System, Inc., reissued the correspondence and mailed it to the Complainant, which is why it bears the May 16, 2025, date. The letter confirms that no validation documentation, including the full account ledger, was ever provided to support the alleged debt. and explicitly stating that no validation documentation was provided to support the alleged debt when it was requested In my CFPB complaint and Transunion dispute request.
3. A copy of Complainant's formal Preservation of Evidence request sent to PPL, including USPS tracking confirmation.

4. A letter from PPL acknowledging that they are only able to provide two years of account history and are unable to furnish complete account documentation necessary to verify the full balance.

These documents further substantiate Complainant's claims that the debt was unverified, misrepresented, and improperly forwarded to third-party debt collectors without due diligence or transparency.

VI. CONCLUSION AND REQUEST FOR RELIEF

For the reasons stated above, Complainant respectfully requests that the Commission:

1. **Deny PPL's request to dismiss** the complaint;
2. **Order PPL to produce the recording** of May 22, 2025, phone call or explain why it was not preserved;
3. **Compel PPL to provide the full account ledger in entirety and breakdown** justifying the \$706.60 balance;
4. **Investigate PPL's role in providing outdated address information to third-party collectors;**
5. Schedule a hearing to resolve the disputed facts surrounding the billing history, collection activity, and handling of this account.

The Complainant reserves the right to submit supplemental evidence, including the Preservation of Evidence Letter (with tracking confirmation) and additional documentation, in support of this reply.

Respectfully submitted,

DeAurdrea Franczak (Long)

Complainant

Date: June 11, 2025



UNKNOWN

+1 (800) 342-5775



May 22, 2025

10:55 AM Incoming Call
41 minutes

Share Contact

Create New Contact

Add to Existing Contact

Add to Emergency Contacts

Block Caller



Favorites



Recents



Contacts



Keypad



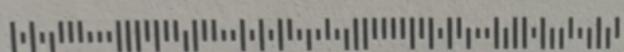
Voicemail

Service Address:
6714 LOWER MACUNGIE RD
APT A6
TREXLERTOWN, PA 18087

PPL Electric Utilities
827 Hausman Road
Allentown, PA 18104-9392
Tel. 800.342.5775 Fax 484.634.3484



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DEAURDREA LINIKA LONG
11405 WARWICK POINTE DRIVE
APARTMENT 202
BRANDON, FL 33511

May 16, 2025

Bill Account Number: 24460-09090

Dear DEAURDREA LINIKA LONG:

Thank you for reaching out about your account. We've enclosed the information you requested. We spoke on 5/16/25 about providing the entire account history since the start of the account on 4/2/2020. We advised that we can only send records of the past two years of an account.

You can also manage your account 24/7, view your bill and track your daily electric use at ppllectric.com.

Thank you for being a valued customer.

Sincerely,

PPL Electric Utilities



Today
3:00 PM

All Photos



LIVE



ACCOUN SUMMARY

Creditor:	Ppl Electric Utilities Corporation
Account No.:	2446009090
I.C. System Reference No.:	336244656-1-49

ACCOUNT UPDATE

Balance:	\$706.60
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5/16/2025

Deaurea Linika Long:

Please accept this letter as confirmation that I.C. System will no longer pursue collection of this account and will return it to Ppl Electric Utilities Corporation.

We will request that any information our office may have forwarded to the credit reporting agencies regarding this account be deleted or removed from their records. You may wish to review your credit report to ensure that your credit information has been properly updated. Your Credit Bureau Account Number is: 160382792

This communication is from a debt collector.

This does not contain a complete list of the rights consumers have under Federal, State, or Local laws.

Toll-Free 866-379-7820

I.C. System, Inc. | 444 Highway 96 East | PO Box 64378 | St. Paul MN 55164-0378

