



Eckert Seamans Cherin & Mellott, LLC
U.S. Steel Tower
600 Grant Street, 44th Floor
Pittsburgh, PA 15219

TEL: 412 566 6000
FAX: 412 566 6099

Lauren M. Burge
412.566.2146
lburge@eckertseamans.com

July 2, 2025

Via Electronic Filing

Matthew L. Homsher, Secretary
Pa. Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Gamal Elsaid v. Reliant Energy Northeast LLC d/b/a NRG Home,
Docket Nos. C-2025-3055698 and C-2025-3055699

Dear Secretary Homsher:

Enclosed for electronic filing please find the Motion to Consolidate on behalf of Reliant Energy Northeast LLC d/b/a NRG Home (“NRG”) with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

/s/ Lauren M. Burge

Lauren M. Burge

Enclosure

cc: Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the enclosed Motion upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

Gamal Elsaid
49 S. Madison Ave
Upper Darby, PA 19082
udsdahmed@gmail.com

Date: July 2, 2025

/s/ Lauren M. Burge

Lauren M. Burge, Esquire

*Counsel for Reliant Energy Northeast LLC
d/b/a NRG Home*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Gamal Elsaid,	:	
	:	
Complainant,	:	
	:	Docket No. C-2025-3055698
v.	:	Docket No. C-2025-3055699
	:	
Reliant Energy Northeast LLC d/b/a NRG Home,	:	
Respondent	:	

NOTICE TO PLEAD

To: Gamal Elsaid
49 S. Madison Ave
Upper Darby, PA 19082

You are hereby notified that an Answer to the enclosed **Motion to Consolidate** of Reliant Energy Northeast LLC d/b/a NRG Home (“NRG”) must be filed within 20 days of the date of service. All pleadings, such as an Answer to Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for NRG and the Administrative Law Judge presiding over the proceeding.

File with:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

With a copy to:

Lauren M. Burge, Esquire
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com

Stephen M. Pemberton, Esquire
Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place, 22nd Floor
Philadelphia, PA 19102
spemberton@eckertseamans.com

/s/ Lauren M. Burge

Lauren M. Burge, Esquire

*Counsel for Reliant Energy Northeast LLC d/b/a
NRG Home*

Date: July 2, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Gamal Elsaid,	:	
	:	
Complainant,	:	
	:	Docket No. C-2025-3055698
v.	:	Docket No. C-2025-3055699
	:	
Reliant Energy Northeast LLC d/b/a NRG Home,	:	
Respondent	:	

**MOTION TO CONSOLIDATE
OF RELIANT ENERGY NORTHEAST LLC D/B/A NRG HOME**

Pursuant to 52 Pa. Code § 5.81(a), Reliant Energy Northeast LLC d/b/a NRG Home (“NRG”) submits this Motion to Consolidate the above-captioned matters. In support of this Motion, NRG avers as follows:

1. On June 12, 2025, the Commission served on NRG two Formal Complaints filed by Gamal Elsaid (“Complainant”) at Docket Nos. C-2025-3055698 and C-2025-3055699.
2. The Complaint at Docket No. C-2025-3055699 relates to Mr. Elsaid’s enrollment with NRG to receive electric generation supply services, and the Complaint at Docket No. C-2025-3055698 relates to Mr. Elsaid’s enrollment with NRG to receive natural gas supply services.
3. The Formal Complaints each allege that the Complainant’s supplier was switched without his consent, and specifically that the switch was initiated by the Complainant’s adult son who did not have permission to make the change.
4. NRG’s records show that the enrollments at issue occurred on the same date, at the same location, and by the same individual.

5. The Formal Complaints involve the same or substantially similar issues of facts and law.

6. Contemporaneously with this Motion to Consolidate, NRG is filing an Answer to each of the Formal Complaints.

7. Section 5.81(a) of the Commission's regulations states that "[t]he Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer [also] may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay." 52 Pa. Code § 5.81(a).

8. Other considerations in ruling on a consolidation include the following: (a) whether additional issues exist that could cloud the determination of common issues; (b) whether consolidation will reduce litigation costs and decision-making for the parties and the Commission; (c) whether the issues in one proceeding go to the heart of an issue in the other proceeding; (d) whether consolidation will unduly protract a hearing or produce a disorderly or unwieldy record; (e) whether different statutory and legal issues are involved; (f) whether the party with the burden of proof differs in the proceedings; (7) whether consolidation will unduly delay the resolution of one of the proceedings; and (8) whether supporting data in both proceedings will be repetitive.¹ As stated in the referenced order, no single consideration, nor group of these considerations, is dispositive of consolidation. Rather, all factors must be evaluated, and a balancing of those favoring and disfavoring consolidation is required.²

¹ See *PUC v. City of Lancaster Sewer Fund*, Docket No. R-2012-2310366, Second Prehearing Order at 3-4 (Nov. 26, 2012) ("*Lancaster Sewer Fund Prehearing Order*").

² *Id.* at 3.

9. As discussed above, although the Complainant has filed Formal Complaints at two separate docket numbers, the Complaints involve the same or substantially similar issues of fact and law. Both relate to the Complainant's enrollment with NRG – one for electric generation supply and one for natural gas supply – which according to NRG records occurred on the same date, at the same location, and by the same individual.

10. Additionally, a balancing of the other considerations referenced in the *Lancaster Sewer Fund Prehearing Order* supports consolidation of these proceedings. Specifically, consolidation will reduce litigation costs and decision-making for the parties and the Commission; the issues are the same notwithstanding the filing of two separate complaints; consolidation will produce an orderly record; the Complainant carries the burden of proof in both proceedings; and consolidation will not unduly delay the resolution of either proceeding.

11. Consolidating these proceedings would promote judicial economy and conserve valuable resources of the parties and the Commission. Since the proceedings involve the same issues of fact and law, no reason exists to have them litigated on separate paths.

WHEREFORE, NRG respectfully requests that the Formal Complaints at Docket Nos. C-2025-3055698 and C-2025-3055699 be consolidated into one proceeding.

Respectfully submitted,

/s/ Lauren M. Burge

Lauren M. Burge, Esquire (I.D. No. 311570)
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
(412) 566-6000 (phone)
(412) 566-6099 (fax)
lburge@eckertseamans.com

Stephen M. Pemberton, Esquire (I.D. No. 336783)
Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place, 22nd Floor
Philadelphia, PA 19102
(215) 851-8400 (phone)
(215) 851-8383 (fax)
spemberton@eckertseamans.com

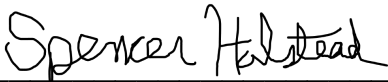
Date: July 2, 2025

*Counsel for Reliant Energy Northeast LLC d/b/a
NRG Home*

VERIFICATION

I, Spencer Halstead, am the CSMR Retail Operations Manager – East Escalated Issues of Reliant Energy Northeast LLC d/b/a NRG Home (“NRG”), and I hereby state that the facts set forth in the foregoing Motion are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: July 2, 2025



Spencer Halstead
Reliant Energy Northeast LLC d/b/a
NRG Home