
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rajwinder Nagra,

Complainant : Docket No. C-2025-3057143
C-2025-3057145
C-2025-3057147
C-2025-3057148
C-2025-3057149
C-2025-3057151
C-2025-3057152
C-2025-3057153
C-2025-3057154
C-2025-3057155

: v.

: PPL Electric Utilities Corporation,

Respondent :

COMPLAINANT’S REPLY TO NEW MATTER AND MOTION FOR EXTENSION OF TIME

NOW COMES Complainant, Rajwinder Nagra, Manager of East End Property LLC (“Complainant”), and hereby files this Reply to the New Matter contained in the Answer of PPL Electric Utilities Corporation (“PPL” or “Respondent”) and respectfully moves this Court for an Extension of Time. In support thereof, Complainant states as follows:

1. Complainant admits the well-established principle that a corporate entity must be represented by counsel in an adversarial proceeding. Complainant filed this action in good faith to consolidate the nearly identical claims of multiple tenants at 410 Williams Street, Bethlehem, PA, who have been affected by the same admitted administrative meter mix-up, seeking to avoid a multiplicity of duplicative proceedings for the convenience of all parties and this Commission.
2. Respondent PPL has admitted the central, material fact underpinning this Complaint: that a significant billing error occurred due to a meter mix-up at the property. PPL's Answer states the company "is currently investigating the circumstances surrounding the meter mix and is undertaking a rebilling effort." (PPL Answer, 4).
3. Given that the core of this dispute is an admitted administrative error with a rebilling solution already in progress, the proceeding, while technically adversarial, is functionally a request for Commission oversight of a corrective action. The formalities of legal representation for the corporate entity at this juncture are unnecessary and create an undue burden.
4. **WHEREFORE**, Complainant respectfully requests that the Honorable Judge exercise discretion to maintain this proceeding in an informal, investigative phase to allow PPL's rebilling effort to be completed and reviewed by the affected parties without requiring Complainant to immediately seek legal counsel. Complainant will seek legal counsel prior to any formal hearings taking place.

ALTERNATIVE REQUESTS FOR RELIEF

5. **In the Alternative**, if the Commission requires the matter to proceed as a formal adversarial proceeding, Complainant is actively seeking to retain legal counsel for East End Property LLC. Complainant respectfully requests a **30-day extension of time** from the date of this filing to secure such representation and for counsel to enter an appearance.
6. **As a Second Alternative**, if the Commission is not inclined to grant the foregoing requests, Complainant intends to withdraw the current complaint and re-file in their individual capacity as a customer directly affected by PPL's billing error. Complainant therefore requests that this proceeding be **stayed (paused) or dismissed without prejudice** to allow for the filing of a new, proper complaint by Rajwinder Nagra and the tenants individually.

CONCLUSION

Complainant has acted in good faith to address a clear utility error impacting multiple residents. The proposed paths forward ensure the substantive issue—correcting PPL's admitted mistake—is resolved, while providing a just and efficient means to address the procedural matter raised by Respondent.

WHEREFORE, Complainant, Rajwinder Nagra, Manager of East End Property LLC, respectfully requests that this Honorable Commission grant his Motion and issue an Order consistent with the primary request or one of the alternative forms of relief outlined above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Rajwinder Nagra', written over a horizontal line.

Date: 10/03/2025

Rajwinder Nagra, Manager East End Property LLC 4179 Rexford Dr Bethlehem, PA 18020
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CERTIFICATE OF SERVICE

I hereby certify that on this [10/03/2025], a true and correct copy of the foregoing **Complainant's Reply to New Matter and Motion for Extension of Time** was served upon the attorneys for Respondent via email at: dryan@postschell.com; alice.wade@postschell.com; hwilburn@postschell.com.

A handwritten signature in black ink, appearing to read 'Rajwinder Nagra', with a horizontal line drawn underneath the signature.

Rajwinder Nagra