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October 14, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor North
Harrisburg, PA 17105-3265

**RE: Gadsden Ridge Holdings, LLC a/k/a Treval LLC v. PPL Electric Utilities Corp.
File No. C-2024-3049516**

Dear Secretary Homsher:

Enclosed for filing is PPL Electric Utilities Corporation's Motion to Dismiss the Complaint of Gadsden Ridge Holdings, LLC a/k/a Treval LLC.

Copies of the aforesaid Motion are being provided as indicated on the Certificate of Service.

Respectfully submitted,



GRAIG M. SCHULTZ

Enclosure

cc: Certificate of Service

**TO: COMPLAINANT GADSDEN RIDGE HOLDINGS, LLC a/k/a TREVAL LLC
YOU ARE HEREBY NOTIFIED THAT A RESPONSIVE PLEADING IS REQUIRED TO BE FILED WITHIN 20 DAYS OF THE DATE OF SERVICE OF THIS MOTION.**

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GADSDEN RIDGE HOLDINGS, LLC
a/k/a TREVAL LLC,

Complainant,

v.

PPL ELECTRIC UTILITIES
CORPORATION,

Respondent.

Docket No. C-2024-3049516

**RESPONDENT PPL ELECTRIC UTILITIES CORPORATION'S MOTION TO DISMISS
THE COMPLAINT OF GADSDEN RIDGE HOLDINGS, LLC a/k/a TREVAL LLC
WITH PREJUDICE**

Respondent PPL Electric Utilities Corporation ("PPL"), by and through its counsel, Fitzpatrick Lentz & Bubba, P.C., hereby moves to dismiss the Complaint of Gadsden Ridge Holdings, LLC a/k/a Treval LLC ("Complainant") with prejudice as follows:

1. On or about June 11, 2024, Complainant filed a formal complaint against PPL averring that PPL has a right of way on Complainant's property and damaged improvements made to his property (the "Complaint").
2. Complainant further averred that PPL ran bulldozers up and down his asphalt driveway and buried over 2,000 feet of stone access roads constructed by Complainant.

3. Complainant also averred PPL has not returned dozens of phone calls, detailed emails and requests for meetings.

4. As relief, Complainant averred he wants his roads replaced back with stone, the topsoil piles returned to a contour that he can mow, the garbage cleaned up, the driveway repaved and stated that his damages exceed \$100,000.

5. On or about July 2, 2024, PPL filed an answer to the Complaint (the “Answer”).

6. In the Answer, PPL admitted it has a right of way on Complainant’s property and denied it exceeded its scope of its right of way.

7. PPL further denied it was negligent or that it damaged or destroyed improvements made to Complainant’s property or his asphalt driveway.

8. PPL further denied it buried access roads, left garbage on Complainant’s home or left dirt on the property which allowed erosion to occur.

9. On or about July 2, 2024, PPL also filed preliminary objections to the Complaint (the “Preliminary Objections”).

10. Complainant did not file a Response to Preliminary Objections.

11. On October 23, 2024, an Interim Order was entered granting the Preliminary Objections to the extent that Complainant seeks an award by the Commission of monetary damages to be paid by PPL and striking any specific request for payment of monetary damages.

12. On October 25, 2024, an Interim Order was entered directing that Complainant cause its legal counsel to enter his or her appearance with the Commission in accordance with the provisions of 52 Pa. Code § 1.24(b), in writing, filed with the Commission Secretary, under the Pennsylvania Public Utility Commission’s rules, not later than 4:30 p.m. on Monday, November 25, 2024 (the “Order”).

13. The Order also provided that the failure of Complainant to fully comply with the terms of the Order, in a full and timely manner, may result in a decision being entered against the Complainant, and in favor of the PPL, without a hearing or further notice in this proceeding.

14. On April 9, 2025, the initial telephone hearing was convened as scheduled. Trevor Walczak appeared at the hearing. The undersigned counsel appeared for PPL along with his witnesses. Legal counsel did not appear for Complainant.

15. Mr. Walczak stated he was a principal of Complainant and requested a continuance in order to have counsel represent Complainant.

16. PPL made an oral motion to dismiss the Complaint for failure of Complainant to appear with counsel and to prosecute the Complaint.

17. PPL's oral motion to dismiss was held in abeyance.

18. On June 20, 2025, an Interim Order was entered directing that Complainant cause its legal counsel to enter his or her appearance with the Commission in accordance with the provisions of 52 Pa. Code § 1.24(b), in writing, filed with the Commission Secretary, under the Pennsylvania Public Utility Commission's rules, not later than 4:30 p.m. on Monday, July 21, 2025 (the "Second Order").

19. The Second Order also provided that the failure of Complainant to fully comply with the terms of the Order, in a full and timely manner, may result in a decision being entered against the Complainant, and in favor of the PPL, without a hearing or further notice in this proceeding.

20. Complainant did not cause counsel to enter an appearance after the Second Order was entered.

21. On September 29, 2025, and Interim Order was entered directing that Complainant cause its legal counsel to enter his or her appearance with the Commission in accordance with the provisions of 52 Pa. Code § 1.24(b), in writing, filed with the Commission Secretary, under the Pennsylvania Public Utility Commission's rules, not later than 4:30 p.m. on Monday, October 13, 2025 (the "Third Order").

22. The Third Order also provided that the failure of Complainant to fully comply with the terms of the Order, in a full and timely manner, may result in a decision being entered against the Complainant, and in favor of the PPL, without a hearing or further notice in this proceeding.

23. Complainant did not cause counsel to enter an appearance after the Third Order was entered.

24. The Commission has held that parties must comply with the orders of an administrative law judge, and a complainant's failure to do so is a sufficient basis to support dismissal of the matter. *See, e.g., Chattin v. Pennsylvania Elec. Co.*, No. C-2017-2630649, 2024 WL 838638, *8 (Pa. P.U.C. Feb. 22, 2024) (citing *Snyderville Cmty. Dev. Corp. v. Philadelphia Gas Works*, Docket No. C-20055032 (Opinion and Order entered July 31, 2006)).

25. As it pertains to this matter, Complainant has been given multiple chances by the Commission to obtain counsel. However, over the course of nearly one year, Complainant has disobeyed the ALJ's Interim Orders directing it to retain counsel if it wished to prosecute its claims.

26. No entry of appearance has been entered for Complainant in this proceeding, despite the directives provided to Complainant. Moreover, in each Interim Order, the ALJ advised Complainant that its failure to comply would result in the dismissal of the Complaint.


27. Because of Complainant's repeated failure to comply with the ALJ's Interim Orders the Complaint should be dismissed with prejudice.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Complaint of Gadsden Ridge Holdings, LLC a/k/a Treval LLC be dismissed with prejudice.

Dated: October 14, 2025

Respectfully submitted,

By: _____


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*Attorneys for Respondent:
PPL Electric Utilities Corporation*

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Docket No. C-2024-3049516

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Dismiss the Complaint of Gadsden Ridge Holdings, LLC a/k/a Treval LLC with prejudice 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 party.

Via First-Class Mail

Gadsden Ridge Holdings LLC / Treval LLC
359 Route 106
Greenfield Township, PA 18407

Dated: October 14, 2025

By: _____

Graig M. Schultz